

January 15, 2014
Assembly Committee on Education

**Wisconsin Department of Public Instruction
Testimony on 2013 Assembly Bill 617**

I want to thank Chairman Kestell and members of the committee for the opportunity to testify before you today on Assembly Bill 617 (AB 617). My name is Sheila Briggs, and I am the Assistant Superintendent of Academic Excellence for the Department of Public Instruction (DPI). With me today is Emilie Amundson, Common Core State Standards (CCSS) Team Director, who is here to assist in answering questions about areas particular to literacy and mathematics, two areas that have seen much recent legislative attention. We are here on behalf of State Superintendent Tony Evers to testify in opposition to AB 617.

DPI has always supported a process of standards review and revision and has a process in place that balances the needs of the field, the capacity of our schools, and new advances in content area research. Through this process, we have developed model academic standards in 23 different content areas. While DPI supports a standards review and revision process, AB 617 contains a number of legal, technical, and implementation issues that make the bill unworkable.

The bill mandates standards revision in six specific subject areas every six years, and outlines in statute a specific schedule by which certain subjects would be addressed, starting with mathematics in July 2016. As a result, the bill creates uncertainty and unspecified costs for Wisconsin schools, creates barriers and unevenness in approach to standards revision across all of our content areas, and eliminates DPI's ability to flexibly respond to the needs of the field. Most importantly, however, this process has the potential to overwhelm our schools and our children, and undermine state level efforts for school improvement.

Under AB 617, many districts may not have fully implemented a set of standards in the classroom before a statewide team would begin the process of revising them again. A state-level standards examination and drafting process typically takes up to two years to complete. After the state-level work is completed, school districts have always had several years to implement new standards before state-level assessments would begin measuring student achievement based on the new standards. Using the Common Core State Standards as an example, Wisconsin districts favored a multi-year phased implementation of the English language arts and mathematics standards adopted in 2010, whereby districts moved from learning about the standards, to examining existing curriculum and instruction, to drafting new curriculum and purchasing new materials. Under the bill, some standards, such as mathematics, would begin a revision process before full implementation of the 2010 standards are even complete, and well before there is state-level assessment data to support and justify any proposed revisions. As a result, the bill would require the development of new standards just as our students are starting to be tested on the old ones – a move that has the potential to overwhelm our

students and teachers.

Under the bill, other standards such as science and social studies would be forced to wait years to begin this process, despite many from the field calling for standards revision in these areas. Through the legislative and DPI hearing processes over the past few months, we heard from many stakeholders, including those who lead and work in Wisconsin's 424 school districts. No school districts were calling on DPI to revise the recently adopted mathematics and English language arts standards, but a number of educators noted that other content areas, particularly science and social studies standards, were in need of revision to achieve the desired specificity found in the Common Core State Standards. Revision of science standards has also been a topic of state and national discussion by leaders of business and industry, particularly those invested in the STEM fields. However, the first two content areas addressed in the bill are mathematics and English. New science standards, for example, would be put off for another four and a half years, and new state science assessments based off better standards could be almost a decade away.

Costs to local school districts could also be significant as a result of AB 617. Wisconsin school districts typically review and revise local curriculum every 7-10 years, cycling through content areas that include mathematics, English, reading, social studies, science, arts, health and physical education, world languages, and the career and technical education fields. They share and disperse the costs and time investments across all content areas so that each area has a timely review. Typically in this process, updates are made to curriculum and textbooks are reviewed to determine whether new materials need to be purchased or updated. When major revisions are made to standards and local education agencies adopt those standards, the likelihood of a lengthy overhaul of curriculum and instructional materials increases, as does the time and cost for local implementation of a set of standards.

Under the process outlined in the bill, certain content areas would occupy most or all of the state and district resources while other content areas would never be revised. The bill requires the establishment of new standards in mathematics, English, science, advanced mathematics, social studies, and the arts every six years. However, the bill prohibits DPI from establishing academic standards except as provided in the bill, and prohibits DPI from revising any academic standards that were adopted and in effect upon passage of the bill. Since the majority of our other content area standards –such as world languages, physical education, career and technical education fields like health and marketing – are not named in the bill, how would they ever be revised?

Further, we have serious concerns about the language in AB 617 that prohibits the Department from revising standards that were adopted prior to passage of the bill, a move which could prevent the Department from making revisions to Common Core State Standards. Is this provision intended to limit the ability to build off the Common Core State Standards or other sets of standards currently in use?

This bill also creates an unusual distinction between mathematics and “advanced mathematics” that is unwarranted and untested. DPI knows of no other state that has created a separate set of statewide “advanced standards,” in mathematics, or any other content

area. State standards are intended to define what we want all children to know and be able to do. Is the expectation that all children would be asked to meet the standards in “advanced mathematics,” or is this a separate track of state-level standards that we expect only certain children to meet? If we expect all children to meet these standards, why would we need to differentiate between “mathematics” and “advanced mathematics”? Would the state assess achievement on “mathematics” and “advanced mathematics”?

Further, the creation of a new set of advanced mathematics standards does not align with the findings of the Mathematics Common Competencies Committee, a committee of representatives from the UW-System, WI Technical Colleges, WI independent/private colleges, and Wisconsin high schools, who reviewed and affirmed that adoption of the CCSS “represent the necessary competencies for success in college,” and that “Demonstrated proficiency in these standards will place students into credit-bearing courses and avoid placement into non-credit bearing remedial classes at any of Wisconsin’s post-secondary institutions.” Additionally, the Committee found that students who “wish to receive a degree in a STEM (Science, Technology, Engineering, Mathematics) major in a timely fashion should take additional mathematics in high school,” (Common Competencies Final Report, 2010).

Finally, this bill is unworkable in its current form, as the following issues persist:

- The use of the rules process also creates increased uncertainty and ambiguity for school districts about whether they will retain the authority to adopt state model academic standards or their own locally-developed standards. By definition, a rule has the effect of law. Is it the Legislature’s intent, by subjecting standard adoption to the administrative rule process, that these standards will be law for school districts? If they are not law and are merely guidance for school districts, why use the administrative rule process?
- Federal law requires the state to administer assessments that are aligned to state standards in the areas of mathematics, English Language Arts, and science. As a result, any significant changes to the standards will require significant changes to the assessments, at an increased cost. This could require the state to reverse course on the plan for new English Language Arts and math assessments already approved by the Governor and Legislature.
- In order for Wisconsin to maintain its federal waiver from the broken No Child Left Behind law, new standards in mathematics or English Language Arts must be validated as “college and career ready,” under a process defined by United States Department of Education (USED). Unless USED changes these provisions, Wisconsin would have to follow this process, or would jeopardize our waiver status.
- A forced system of standards revision could undermine efforts at transforming education that have been supported by the Legislature, the Governor, and the State Superintendent. As noted previously, this bill would require standards to be changed just as students are starting to be tested on the old ones. By calling into question what we expect students to know and be able to do and what we expect teachers to teach, and how we will assess student progress, we run the risk of undermining our statewide accountability system and

system of educator effectiveness. We may not be able to examine comparable sets of statewide data across multiple years to gauge true student academic growth. Are we willing to risk the status of these other reforms when there is already a standards revision process in Wisconsin?

- This bill appears to create a “limbo period” whereby a set of standards sunsets before a new set of standards is promulgated. This creates a period of uncertainty for districts and jeopardizes Wisconsin’s compliance with federal law and our waiver status with USED.
- The bill requires that the academic standards established by rule will “have the effect of raising pupils’ academic performances.” Since standards cannot be field-tested without considerable comingling the external variables of effective teaching, rigorous locally-selected and implemented curriculum, and particular instructional approaches, there is little way to ensure that a set of standards will “have the effect of raising pupils’ academic performances.”
- This bill adds considerable time and cost to an already lengthy and costly process by inserting a statewide advisory committee process that would function in addition to a statewide standards drafting team made up of content experts from the field. No additional funding is provided in the legislation to achieve this goal.

A high quality education for every child is our shared mutual goal. We must continue to ensure all content areas have world class standards that prepare students for college and the world of work, and standards review and revision has always been and will continue to be one way that DPI does this. On behalf of the state superintendent I thank you for the opportunity to testify before you today and at this point we would be happy to answer any questions you may have.