

**Congress of the United States**  
**Washington, DC 20515**

November 18, 2013

The Honorable Arne Duncan  
Secretary  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington, DC 20202

Dear Secretary Duncan,

We write today on behalf of concerned constituents, state elected officials, local school officials, teachers, and parents regarding the Common Core State Standards (CCSS), and more specifically, to address the mounting apprehension surrounding the upcoming rollout of the CCSS assessments. We strongly oppose the federal mandates of the CCSS standards and assessments, and believe they are a serious breach of overreach by the federal government. By the 2014-15 school year, Ohio - like the majority of other states - will replace its own student evaluations with common assessments. As you know, these assessments were created by the Partnership for Assessment of Readiness for College and Careers (PARCC) and the Smarter Balanced Assessment Consortium (SBAC), and will evaluate students on their understanding of the CCSS.

While we admire efforts that attempt to improve upon assessing student comprehension and growth, we are concerned about the manner in which these assessments are being created and implemented. As the PARCC and the SBAC assessments are finalized, we believe they will represent another unfortunate example of federal overreach, stemming from the Department of Education's push for state adoption of the CCSS through the Race to the Top Program (RTTT) and ESEA flexibility waivers. The fiscal realities of implementing these assessments, as well as the effects its hurried implementation could have on accurately measuring student performance, are also of concern.

It is disconcerting that while the Department of Education has refused to admit any involvement in creating the CCSS, or even incentivizing states to adopt them, it has provided the PARCC and the SBAC with a total of \$330 million to align their assessments with the English language arts and mathematics standards developed by the CCSS. Although the PARCC and the SBAC assessments are not mandatory, it is our understanding that states must evaluate student understanding of the CCSS. It is important to note that the costs for a state to create its own tests based on the CCSS would be very expensive – something that you have admitted yourself. In a tight fiscal environment that has already been burdened by previous federal interventions, such as implementing new professional evaluation methods called for by RTTT, states simply cannot afford to develop assessments of their own. As a result, we believe that these assessments amount to a back door approach to education reform and usurps the rights of the states to manage the educational needs of its citizens, providing further evidence that the Department of Education is working to push the CCSS without Congressional input, or the input of the American people.

Equally concerning, the costs to transition and use the PARCC or the SBAC assessments will not be cheap, and consequently, many Ohioans have become uneasy over the State's intended use of the PARCC's all-online testing for the 2014-15 school year. State officials, superintendents, and others have expressed concern over some school districts' inability to successfully and cost effectively execute these new assessments – especially districts located in rural Ohio that currently lack the assessment's capacity requirements. The very real costs that are needed to administer these tests, such as wiring, technical support, bandwidth, and training will need to be addressed in a very short and expensive time frame. While the PARCC has indicated that pencil and

paper tests will be available for the 2014-15 school year, they will actually cost more than their computer based equivalents.

Teachers and administrators have also expressed exasperation over the time frame in which they must make changes in curricula and create effective professional development programs in order to prepare the students for the assessments next year. They worry that the assessments could end up measuring a set of standards that states haven't been able to fully implement, resulting in poor test scores. It's unfortunate to think how harmful these assessments could be to our students as they begin to apply for college in the coming years. Even more troublesome is that the Department of Education is largely responsible for this hurried implementation, as the PARCC and the SBAC grants required the groups to have the assessments ready to be used by next school year.

In light of these shortcomings, we respectfully request a response that details the Department of Education's involvement with the PARCC and the SBAC, specifically highlighting its role in creating the two assessments. We would also like to know why the Department of Education required states to implement CCSS and its assessments in such a short time frame. Additionally, we believe that the Department of Education should allow states operating under RTTT and the ESEA waiver agreements greater flexibility, by removing language that requires states to use the CCSS and to also issue assessments to evaluate student comprehension of the CCSS – like those being created by the PARCC and the SBAC.

If the Department of Education wants to truly enact meaningful education reform, then it must allow states the ability to determine how best to use its educational resources. We believe that our educational system must be driven by those who know our students best – like local state leaders, local school officials, teachers, and parents - in order for our children to truly reach their greatest potential.

We appreciate your attention to these matters, and look forward to your response.

Sincerely,

Bill Johnson

Jim Jordan

Bruce R. Wansley

Steve Croot

[Signature]

Bob Mills