

## Review of 2/8/10 Common Core Standards Drafts

Special Education Policy Division Review  
2/10/10

### Comments related to both the ELA and Mathematics drafts:

1. Universal Design for Learning (UDL)/ Universal Design for Instruction (UDI): Move the references to UDL and UDI into the overall preamble. They are concepts that are beneficial to all students, not just students with disabilities. Incorporating the principles of UDL provides greater access to the instructional standards by removing content standard variant details. UDL is not, by nature, a pedagogical model for students with disabilities. It is a model for all students, which includes students with disabilities.
2. Make sure that intended flexibility in instruction and assessment is clear in the way that standards are written. Many users will read these standards and develop assessment items to measure them very concretely, without applying flexibility in instruction and assessment that may be intended. If flexibility (e.g., multiple means of presentation, multiple means of expression, etc..) is important, it needs to be specifically stated and clear in the way that standards are written. Otherwise, there will be inconsistent application and artificial barriers to accessing the content standards.

For example, in the College- and Career-Ready Standards for Writing (p.41), the following are currently included:

- Write arguments to support...
- Write informative...
- Write well-structured...

The way these are currently written allows great variability in the extent to which teachers will approach the idea of “writing” and the “acceptable” demonstrations of these writing skills.

3. Improve the Students with Disabilities Preamble. We suggest replacing the second paragraph on P.7 of the ELA draft and P.11 of the Mathematics draft with the following: “Students with disabilities- students eligible under the Individuals with Disabilities Education Act (IDEA)- must be provided access to the same high standards in mathematics and English language arts (ELA) as all other students in order to demonstrate the knowledge and skills necessary for success in their post-school lives. These common core standards, developed with the principles of Universal Design for Learning as an organizing principle for all students, provide a historic opportunity to improve and ensure access to academic content standards for students with disabilities. The continued development of understanding about research-based practices and a focus on their effective implementation will also help improve the instructional practices provided by all teachers and improve access to the content standards for all students, including students with disabilities”.

Rationale: The draft narrative is very subjective, without supporting fact or citation, and is difficult to operationalize. It also does not motivate those who have been working in the field nor are currently teachers to understand the changes that need to be made. The emphasis in this section should be on effective implementation of the proposed standards.

4. Improved Consistency Across Drafts. There needs to be better consistency across the ELA and Mathematics standards, in terms of the grain size of the standard and the writing/organizational style. There are many consumers of these standards (including grade-level general education teachers, special education teachers, and parents) who will access more than one of these documents. The learning progressions across grade bands were very helpful in the ELA draft, but not articulated in the Mathematics draft.
5. Organizing principle(s). There appears to be a conflict within some of the standards. Some appear to be constructed with the idea that all children can/should be able to demonstrate their knowledge on a standard. Others appear to be designed in order to differentiate student performance. Differentiation, particularly among groups (including students with disabilities), has had a troubled past and should not be inferred or supported through these standards.
6. UDL Language Applied at the Standard Level. We very much appreciate the efforts to date to apply UDL principles in the development of standards. We have seen progress in many areas from the earlier draft, but some standards that continue to have difficulty incorporating these principles.

UDL principles provide for:

- Multiple and flexible methods of presentation to give students with diverse learning styles various ways of acquiring information and knowledge;
- Multiple and flexible means of expression and representation to provide diverse students with alternatives for demonstrating what they have learned;
- Multiple and flexible means of engagement to tap into diverse learners' interests, challenge them appropriately, and motivate them to learn<sup>1</sup>.

Reviewers discussed the word 'describe' and made the assumption that this term can be more than verbal or written action. Verbal and written modes may work for the vast majority of students, but limiting the forms of acceptable expression or demonstration of knowledge in this way may inadvertently limit access to these specific standards for students with disabilities who have limited verbal or written skills. The reviewer recommendation would be to change the word 'describe' to 'express' or some other word that does not artificially narrow the forms of expression that would be acceptable for demonstration of student knowledge of the content of each standard. In several instances, it is possible to demonstrate knowledge in a certain area without the requirement for verbal or written expression.

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<sup>1</sup> CAST, UDL Questions and Answers, <http://www.cast.org/research/faq/index.html#q1>

If the term “describe” is integral to the standards, then it is recommended that a common definition of “describe” is provided to clarify the flexibility included to allow multiple ways to demonstrate or perform in all areas.

## **Examples of ELA Core Standards that do and do not apply UDL**

### **principles:**

Standards that apply UDL principles:

- Demonstrate understanding of text using vocabulary... (p.58)
- Produce and expand complete sentences in response to questions and prompts.
- Sort words into categories (e.g., colors, clothing).

Standards that do not apply UDL principles

- Explain how the author of the text uses to structure information (p.58)
  - Alternate= Demonstrate an understanding
- Speak audibly and clearly.
  - Alternate= Communicate clearly
- Write narratives, informative and explanatory text, and opinions that communicate to a familiar, known audience.
  - Alternate= Generate narratives...

## **Examples of Mathematical Core Standards that do and do not apply**

### **UDL principles**

Standards that apply UDL principles:

- Use representations (objects, pictures, story contexts) to describe and justify properties of addition and subtraction.
- Solve word problems that involve adding, subtracting, ordering and comparing fractions.

Standards that do not apply UDL principles:

- Use facts about angles to write and solve simple equations... (p.21)
  - Alternate= to develop and solve
- Say the number word sequence to 100 (p.17);
  - Alternate= Demonstrate understanding of...
- Write numbers from 1 to 30 (p.17);
  - Alternates= generate, produce, express, or represent
- Draw a picture graph and a bar graph (p.19). . .
  - Alternate= generate