

**Gwendolyn Caldwell**

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**Subject:** FW: Analysis of latest CCSS amdt filed to SB 1764

**From:** Robert Sommers <[Robert.Sommers@careertech.ok.gov](mailto:Robert.Sommers@careertech.ok.gov)>

**Date:** March 11, 2014, 9:39:46 PM CDT

**Subject: RE: New CCSS amdt filed to SB 1764**

Here is my analysis of the current amendment. I'm sure the following were not intended by the authors, but as written it appears to do the following:

The amendment appears to broadly apply to all standards and assessments offered in public schools. If so, it would encompass a full range of careertech programs including STEM programs, Agricultural Education/FFA, and several other similarly situated programs with standards, assessments, and curriculum.

The prohibition on federal or national engagement in standards and assessments identified in Section 11-103.6aC3 would eliminate our ability to engage with national industry standards documents and their corresponding assessments. It would also jeopardize our Carl D. Perkins funding because this federal grant requires the creation of standards and assessments consistent with, in many cases, national industry standards.

Section 11-103.6aE specifically prohibits any agency or board of the state to enter into any agreement, etc that cedes or limits state discretion or control over development, adoption, or revision of standards and assessments in the public school system. This would eliminate our ability to engage with national youth organizations such as the FFA. The FFA is particularly challenged by this section because it is a federal program as defined in Public Law 105-225 (formerly Public Law 81-740). This federal legislation specifically identifies the leadership of the FFA as individuals employed by the United States Department of Education. Significant standards, assessments, and in some cases curriculum are dictated from the National FFA Organization.

This amendment also clearly negates any options for using national assessments such as ACT.

The impact of this amendment is substantial and could have significant unintended consequences. A careful deliberation of the nuances is strongly encouraged.

Further, we must engage educators from around the state in this discussion. Educators I'm meeting with have valuable insight into what needs to be done to support high quality education. They are especially concerned the current options, including this amendment, will only add to the confusion teachers are already feeling. We all know the challenges we currently face are a direct result of inadequate discussions with educators. We need to be sure we don't repeat this error.

Robert D. Sommers, PhD  
Oklahoma Secretary of Education and Workforce Development  
State Director, Oklahoma Department of Career and Technology Education  
405-880-2881  
Twitter: @rdsommers

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