

1 Chairman Reagan and Honorable Members of the Joint Legislative Committee on
2 Administrative Rules:

3
4 My name is David Murotake, and I represent Nashua's Fifth Ward. I am also one of nine
5 at-large members of the Nashua Board of Education, chair its Curriculum and Evaluation
6 Committee, and serve on its Policy Committee.

7
8 I have closely tracked the education reforms mandated by the State Board of Education
9 since 2010. These include a variety of simultaneous reforms, including conversion to
10 competency based grading, Common Core State Standards, and other changes to State
11 education requirements. I have concerns about the proposed amendments to Ed 306, and
12 cannot support the proposed changes. Instead, I ask the Committee to not approve the
13 changes at this time, returning the proposed draft to both the State Board of Education,
14 and the Legislative Oversight Committee, for additional study.

15
16 I have concerns over the erosion of local school board and district governance by both the
17 State and Federal Departments of Education. By RSA 186:5, the State Board of
18 Education "shall have the same powers of management, supervision, and direction over
19 all public schools in this state as the directors of a business corporation have over its
20 business, except as otherwise limited by law", and further, that "It shall be the duty of
21 school boards and employees of school districts to comply with the rules and regulations
22 of the State Board". Basically, what the State Board directs, local school boards and
23 districts MUST comply.

24
25 This trend to erosion of local control is reflected in the proposed revisions. Our school
26 board will need to revise approximately twenty (20) existing policies, and adopt an
27 assortment of new and expanded policies. These changes are mandates from the State,
28 seemingly without appreciation of the very real impact on our schools and budgets. I
29 believe that this is an inappropriate over-reach into the legal and policy-making domain
30 of our local school board and our citizens. By example, the mandate to adopt Common
31 Core State Standards by Spring 2015, without adequate compensation of costs, in my
32 opinion constitutes a violation of our State Constitution, Section 1, Article 28. This
33 exacerbates our Federal unfunded mandates, which exceed \$6 million annually.

34
35 Additionally, these required policy-related changes will come at the very time when our
36 district grapples with yet to be defined changes apparently required by the ESEA waiver;
37 the implementation of the Common Core State Standards, a transition to the Smarter
38 Balance assessment tools, and competency based grading. Simply put, too much has been
39 put on our "plate", and Nashua students, teachers and parents are beginning to notice.

40
41 This past Wednesday, teachers and principals from two of our three Middle Schools took
42 the Smarter Balanced Assessment practice exam for grade level 8. I have since heard
43 from several teachers, and according to them, the experience shocked all of them. It
44 appears that principals and teachers were nearly unanimous in their objection to the test.

45
46 Examples of Nashua teacher comments I heard include:

- 47 1. Shockingly negative experience.
48 2. Totally grade level inappropriate; difficult even for some teachers with advanced
49 degrees.
50 3. Seems the test was designed more as a psychological or sociological experiment, not as
51 a measure of academic learning. Who created this test, anyway? It couldn't have been by
52 professional educators.
53 4. This would be a crushing emotional experience for my students.
54 5. It is nothing less than child abuse for my special ed students in my classroom.
55 6. I refuse to administer this test to my students.
56 7. We're going to collect up our comments and make sure it gets to the State.

57
58 There's more, including serious concerns on privacy issues, but you get the idea.

59
60 At the same time, as our District continues its transition to competency based grading,
61 which takes great effort on the parts of our teachers and our home office staff, we have
62 been hearing concerns from students and parents about the problems with the transition.
63 Our teachers have been clearly stating they feel overburdened, with the pressures of
64 implementing changes in grading and assessment metrics, while at the same time,
65 aligning curriculums and lesson plans to the Common Core standards for math and ELA.

66
67 Part of the problem is clearly that "version 1.0" of the Common Core Assessments are
68 not "ready for prime time". That was clearly stated by US DOE Secretary Arne Duncan
69 on April 30, when he called for "Assessment 2.0" in light of the disastrous results for
70 Common Core in Kentucky and New York earlier this year. On the same day, the
71 national Presidents of the NEA and AFT called for 2-year moratoriums on the Common
72 Core Assessments and Consequences. In May, the national associations of school boards,
73 school superintendents, elementary and secondary school principals issued a joint letter
74 calling for a delay in deployment of the Common Core reforms. The NH School Board
75 Association, on September 13, also issued a letter to our State Board of Education,
76 critical of the large number of changes being mandated on local districts simultaneously,
77 and calling for a more measured implementation of changes to education mandates.

78
79 Several states recently have called for delays in Common Core deployments, or,
80 withdrawn completely. The latest example is Massachusetts, whose State Board of
81 Education announced on Nov. 23 that a delay in mandatory Common Core assessments
82 was being put into place, while the State Board of Education and Department of
83 Education re-examine the Common Core curriculum standards, the high stakes
84 assessments, and determine a more measured, and appropriate, way forward.

85
86 Please do not approve the proposed changes to ED306 at this time. Instead, I ask this
87 Committee to return the proposed changes to the State Board of Education, and the
88 Legislative Oversight Committee, for additional study and time. Thank you.

89
90
91


92 David K. Murotake, O.C.D.S., Ph.D., NH State Representative, Hillsborough 32