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Comment on the interpretation of the four standards in the regulations: a fundamental suggestion for Standard 1 on standards and assessments -- that a premium be placed on greater content specificity. The guidelines need not insist that this specificity be mandated, but the guidelines should require the state to offer at least one exemplary, highly specific curriculum guide by way of offering a concrete example of how their standards could be implemented.

None of the other three standards can be effectively fulfilled without grade-by-grade specificity of core subject matter, which is also a requirement for good assessments. A good assessment will not only measure progress but will also have a positive influence on teaching and learning (consequential validity) by being tied to the concrete subject matters and fluencies for a grade level.

Improving teacher effectiveness and achieving equity in teacher distribution. Effective teachers are made not just born. Pre-service and in-service training cannot produce effective teachers unless it focuses on the subject matters to be taught, and the most effective means of teaching them at that grade level. The notion that learning a set of formal teaching strategies will produce good teachers is a half or quarter truth. Without concrete instruction in the specific domains of knowledge to be taught, and without instruction in how to convey that concrete knowledge effectively at a specific grade level, teacher training will be ineffective. Lack of such specific, content-oriented instruction has produced a weak teaching force.

But content-oriented training cannot be offered in the absence of specific content guidelines. In short, teacher effectiveness will depend on grade-by-grade, content-specific standards.

Improving collection of data. The improvement of data collection systems will be fruitless if the data is uninformative. A more definite set of content standards and the more tailored assessments that accompany them will offer better opportunities to analyze productively students' areas of weakness and allow effective interventions. Just as assessments should have consequential validity, so should data gathering from those assessments.

Supporting struggling schools. A struggling school will be supported best, just as a struggling student is supported best if the outcome goals are attainable and well defined. More specific content standards induce more effective teaching materials and more effective teachers.

In sum, the wording of the guidelines should put a definite scoring premium on grade-by-grade content specificity.