



December 21, 2022

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**Re: In The Matter of the Proposed Rules Governing the K-12 Academic Standards in English Language Arts, Minnesota Rules 3501.0660, and Repeal of Minnesota Rules 3501.0640-0655; Revisor's ID Number R-04685, OAH Docket No. 65-9005-37333**

Dear Librarian:

The Minnesota Department of Education intends to adopt rules governing the K-12 academic standards in English language arts. We plan to publish a Dual Notice of Hearing in the December 27, 2022 State Register.

The Department has prepared a Statement of Need and Reasonableness. As required by Minnesota Statutes, sections 14.131 and 14.23, the Department is sending the Library an electronic copy of the Statement of Need and Reasonableness at the same time we are mailing our Notice of Intent to Adopt Rules.

If you have questions, please contact me at 651-582-8830 or email: [eric.s.taubel@state.mn.us](mailto:eric.s.taubel@state.mn.us).

Yours very truly,

Eric Taubel  
General Counsel

Enclosure: Statement of Need and Reasonableness



## **STATEMENT OF NEED AND REASONABLENESS**

In the Matter of the Proposed Amendment to Rules Governing K–12  
Academic Standards in English Language Arts, Minnesota Rules 3501.0660;  
Repeal of Rules 3501.0640-0655; Revisor’s ID Number R-4685

Division of Academic Standards, Instruction, and Assessment

December, 2022

General information:

1. Availability: The State Register notice, this Statement of Need and Reasonableness (SONAR), and the proposed rule will be available during the public comment period on MDE's K-12 Academic Standards in English Language Arts rulemaking webpage.  
View older rule records at: Minnesota Rule Status <https://www.revisor.mn.gov/rules/status/>
2. Agency contact for information, documents, or alternative formats: Upon request, this Statement of Need and Reasonableness can be made available in an alternative format, such as large print, braille, or audio. To make a request, contact Eric Taubel, General Counsel, Minnesota Department of Education, 400 NE Stinson Blvd. Minneapolis, MN 55413; telephone 651-582-8830; email [eric.s.taubel@state.mn.us](mailto:eric.s.taubel@state.mn.us); or use your preferred telecommunications relay service.
3. How to read a Minnesota Statutes citation: Minn. Stat. § 999.09, subd. 9(f)(1)(ii)(A) is read as Minnesota Statutes, section 999.079, subdivision 9, paragraph (f), clause (1), item (ii), subitem (A).
4. How to read a Minnesota Rules citation: Minn. R. 9999.0909, subp. 9(B)(3)(b)(i) is read as Minnesota Rules, chapter 9999, part 0909, subpart 9, item B, subitem (3), unit (b), subunit (i).

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## Acronyms

APA	Administrative Procedures Act
ALJ	Administrative Law Judge
CFR	Code of Federal Regulations
MAT	MN Association of Townships
MDE	Minnesota Department of Education
Minn. R. pt	Minnesota Rules part
Minn. Stat.	Minnesota Statutes
MMB	Minnesota Management and Budget
MN	Minnesota
MORS	MN Office of the Revisor of Statutes
OAH	Office of Administrative Hearings
SONAR	Statement of Need and Reasonableness

# Introduction and Overview

## Introduction

For years, education reformers have highlighted the value of literacy as the foundation upon which young learners build their future academic success.<sup>1</sup> Although literacy has been defined in various ways, its importance in contemporary society cannot be overemphasized. The term *literacy*, as it is used by the state of Minnesota, is synonymous with *English language arts* and includes the integrated skills of reading, writing, media literacy, and exchanging ideas through listening and speaking. Students with proficient literacy skills are more likely to graduate from high school and find career and college success.<sup>2</sup> An impressive body of research underscores the significance of literacy skills.

Reading is often cited for its unique place of importance in education. Psychologist Margaret Kay maintains that there is no other skill taught in school that is more important than reading, referring to it as “the gateway to all other knowledge.” She warns that if children fail to learn to read efficiently, “the path will be blocked to every subject they encounter in their school years.”<sup>3</sup> Students with strong reading skills also tend to enjoy reading more and will tend to read throughout their lives for pleasure and other purposes. A study completed in 2000 by the Organization for Economic Co-operation and Development (OECD) examined the factors that had the greatest impact on a person’s financial stability. This research revealed that the enjoyment of reading (not just the ability to read, but the enjoyment of reading) was the single most influential factor in a person’s future financial security.<sup>4</sup>

In the past ten years, educators, nation-wide, have been attending to research about how students learn to read. This collection of research, often referred to as the Science of Reading, is a vast interdisciplinary body of research about how students learn to read and comprehend what they read. While much of the research embodied in the Science of Reading is not new, there has been a growing groundswell of educator understanding about the research and interest in the research. The Reading League has called this time a defining moment in reading education. The Science of Reading informs educator understanding that skilled reading is a product, at the most basic level, of decoding skill and language comprehension skill, as is shown by Gough and Tunmer in the Simple View of Reading. Both decoding and language comprehension skills have component skills, which are outlined by Scarborough in what is referred to as Scarborough’s Reading Rope. The Science of Reading highlights the importance of systematic and explicit instruction. While academic standards

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<sup>1</sup> *Reading and Writing in the Academic Content Areas*, Alliance for Excellent Education, Issue Brief (June 2006).

<sup>2</sup> Annie E Casey Foundation, *Early Warning Confirmed: A Research Update on Third Grade Reading* (2013), available at: <https://www.aecf.org/resources/early-warning-confirmed#:~:text=Early%20Warning%20summarized%20the%20early,in%20life%20and%20the%20workforce> (last visited March 24, 2022).

<sup>3</sup> Excerpt from Reading: The First Chapter in Education, available at: <https://files.eric.ed.gov/fulltext/ED398691.pdf> (last visited March 4, 2022).

<sup>4</sup> Brehaut, Andrew, *The Enjoyment of Reading and Its Impact on a Child’s Success*, available at: <https://ezinearticles.com/?The-Enjoyment-of-Reading-and-Its-Impact-on-a-Childs-Success&id=1731580> (last visited March 4, 2022). This article references the OECD’s Program for International Assessment (PISA), a study completed in 2000.



do not endorse a particular instructional strategy, it is imperative that they, and the supporting benchmarks, are detailed enough to support evidence-based instructional strategies. Psychologist Mark Seidenberg points to the gulf between science related to how students learn to read and instructional practice in elementary classrooms:

A look at the science reveals that the methods commonly used to teach children are inconsistent with basic facts about human cognition and development and so make learning to read more difficult than it should be. They inadvertently place many children at a risk for reading failure. They discriminate against poorer children. They discourage children who could have become more successful readers.<sup>5</sup>

Along with reading skills, writing skills are a predictor of academic success and a basic requirement for participation in civic life and the global economy.<sup>6</sup> History is replete with examples of how, at its best, writing has even helped transform the world. Writing has started revolutions, toppled oppression, and enlightened the human condition. “American life is richer,” writes the National Commission on Writing, “because people such as Rachel Carson, Cesar Chavez, Thomas Jefferson, and Martin Luther King, Jr. have given voice to the aspirations of the nation and people.”<sup>7</sup> Writing also sustains American life and popular culture. Students will need to communicate clearly in writing in nearly all of their future endeavors. The 2017 NAEP Framework highlights the need for writing that is efficient and allows for effective communication to a variety of audiences.<sup>8</sup>

Research indicates that students in the 21st century will read and write more than at any other time in history. In this knowledge economy, students must be able to draw on strong literacy skills to cope with the flood of information that will confront them as adults. They will need strong literacy skills to be effective in their jobs, run their households, exercise the rights and responsibilities of citizenship, and manage their personal lives. Strong literacy skills, though, are needed for much more than meeting the everyday demands of academic, community, and work life. Students “will need literacy to feed their imaginations so they can create the world of the future. In a complex and sometimes even dangerous world, their ability to read [and write] will be crucial.”<sup>9</sup>

While the foundational skills of reading and writing are essential, in the complex and dynamic society students are entering, literacy expands beyond reading and writing to exchanging ideas, communicating, critically analyzing, and collaborating. Used this way, literacy is closely linked with the capacity to learn and is defined by the ability to read, write, speak, listen, and think critically.<sup>10</sup> Research shows that being literate is closely linked

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<sup>5</sup> Seidenberg, Mark, *Language at the Speed of Sight: How We Read, Why So Many Can't, and What Can Be Done About It*, New York: Basic Books, p. 9 (2017).

<sup>6</sup> Graham, Steve & Perin, Delores, *Writing Next: Effective Strategies to Improve Writing of Adolescents in Middle and High Schools-A Report to Carnegie Corporation of New York*, p. 2 (2007).

<sup>7</sup> The National Commission on Writing in America's Schools and Colleges, *The Neglected "R": The Need for a Writing Revolution*, College Entrance Examination Board, p. 10 (April 2003).

<sup>8</sup> National Assessment Governing Board, U.S. Department of Education, *Writing Framework for the 2017 National Assessment of Educational Progress (NAEP)*, p. 1–11, available at: <https://www.nagb.gov/content/dam/nagb/en/documents/publications/frameworks/writing/2017-writing-framework.pdf> (last visited March 24, 2022).

<sup>9</sup> Moore, David W., Bean, Thomas W., Birdyshaw, Deanna, & Rycik, James A., *Adolescent Literacy: A Position Statement for the Commission on Adolescent Literacy of the International Reading Association*, p. 99 (1999).

<sup>10</sup> Alliance for Excellent Education, *Reading for the 21st Century: Adolescent Literacy Teaching and Learning Strategies*, p. 1 (January 2004).

to students' ability to access power and negotiate the world around them. Young people need to develop strong literacy skills to communicate effectively, gain respect from peers and authority, participate in their communities in a meaningful way, and fully contribute to society. Research has shown for years that literacy is broader than learning to read and write because students need literacy to communicate and collaborate with others in productive ways in social, academic, and future work settings.<sup>11</sup> Research in the field of English Language Learners makes the case that communication is complex because it requires both listening and speaking in the same exchange of ideas.<sup>12</sup>

Literacy provides a crucial foundation for meeting the challenges of college, the modern workforce, and life in a technological society. Media Literacy, the ability to access, analyze, evaluate, and create media in a variety of forms<sup>13</sup>, has been a prominent need for students throughout the 21<sup>st</sup> century. In 2010, the Council of Chief School Officers and the National Governor's Association acknowledged that "(s)tudents need the ability to gather, comprehend, evaluate, synthesize, and report on information and ideas, to conduct original research in order to answer questions or solve problems, and to analyze and create a high volume and extensive range of print and non-print texts in media forms old and new. In fact, the need to conduct research and to produce and consume media is embedded into every aspect of today's curriculum."<sup>14</sup> The expectations of students' abilities to negotiate an ever complex media world have grown. Research now shows that nimble students, who acquire and sift through information, evaluate sources, and have strong problem solving skills will be successful in future endeavors.<sup>15</sup>

It is important for students to excel in not just a few but all aspects of literacy. For example, in the business world, people with good communication skills are more likely to get and to keep a job.<sup>16</sup> According to Achieve, "success in the workplace, whatever the profession, is dependent on one's ability to listen attentively to colleagues or customers and to express ideas clearly and persuasively."<sup>17</sup> Additionally, as methods of communication change over time, students must become comfortable dealing with information in a variety of ways. For instance, the viewing and visual representation of ideas is increasingly important to how people

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<sup>11</sup> Report of the National Commission on Writing for America's Families, Schools, and Colleges, *Writing and School Reform, Including the Neglected "R,"* (May 2006).

<sup>12</sup> Leong, Lai-Mei. & Ahmadi, Seyedeh Masoumeh Ahmadi, *An Analysis of Factors Influencing Learners' English Speaking Skill*, International Journal of Research in English Education (2017), available at: <http://ijreeonline.com/article-1-38-en.pdf> (last visited March 24, 2022).

<sup>13</sup> Center for Media Literacy definition at <https://www.medialit.org/media-literacy-definition-and-more> (last visited March 24, 2022).

<sup>14</sup> Council of Chief State School Officers (CCSSO) and the National Governors Association (NGA), Common Core State Standards Initiative, Common Core State Standards for English Language Arts & Literacy in History/Social Studies, Science, and Technical Subjects, p. 4 (2010).

<sup>15</sup> Karchmer, Rachel A., *The Journey Ahead: Thirteen Teachers Report How the Internet Influences Literacy and Literacy Instruction in Their K-12 Classrooms*, Handbook on Research on New Literacies, New York: Routledge, p. 1241 (2008).

<sup>16</sup> Brinkley, Ellen & Harper, Nancy, *The College Board English Language Arts Framework*, The College Board (November 14, 2007) (citing Mann, L., Education Update, 1999) available at: <https://tillamookbaycc.edu/wp-content/uploads/2017/04/College-Board-ELAFramework.pdf> (last visited March 4, 2022).

<sup>17</sup> American Diploma Project Report, English Benchmarks (2004), available at: <https://www.achievethecore.org/ReadyorNot> (last visited March 4, 2022).

gather and share information. Therefore, “(t)eachers and students need to expand their appreciation of the power of print and nonprint texts.”<sup>18</sup>

## Statement of General Need

### Evidence of a Literacy Crisis

There is substantial evidence of a crisis in this country across all aspects of literacy, including reading, speaking, and writing.<sup>19</sup> In the United States, “approximately eight million students between fourth and twelfth grade struggle to read at grade level. About 70 percent of older readers require some form of reading remediation.”<sup>20</sup> In Minnesota in 2019, 86,073 students (18.9%) partially met state reading standards and 99,546 students (21.9%) did not meet reading standards as measured by the Minnesota Comprehensive Assessment for Reading. This means that our schools were failing to prepare over 40% of Minnesota students for the literacy needs of their futures. The dominant thinking in 2010 from the CCSSO and NGA was that the literacy crisis was caused, in part, by the gap that exists between the K–12 texts that students read and the “real-world” demands for reading skills. They said,

[Although] reading demands in college, workforce training programs, and life in general have held steady or increased over the last half century, K–12 texts have actually declined in sophistication, and relatively little attention has been paid to students’ ability to read complex texts independently. These conditions have left a serious gap between many high school seniors’ reading ability and the reading requirements they will face after graduation.<sup>21</sup>

In 2022, as understanding around the Science of Reading has developed, experts believe that the gap is caused, in large part, by students not receiving explicit, systematic instruction on word recognition in the early grades in order to provide the building blocks of skilled reading comprehension. As understanding of how reading is processed in the brain evolves, it has been discovered that explicit instruction and deliberate practice build neural pathways that connect speech sounds, print, language, and meaning.<sup>22</sup> Attending to the foundational reading and writing skills in elementary school should not reduce the rigor of reading comprehension and writing composition instruction but should provide the basis for students to be able to read on grade level and meet grade-level writing expectations.

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<sup>18</sup> National Council of Teachers of English (NCTE) Position Statement, *NCTE Statement on Visual Literacy On Viewing and Visually Representing as Forms of Literacy*, (November 1996) available at:

<http://www.ncte.org/positions/statements/visualformofliteracy> (last visited March 4, 2022).

<sup>19</sup> Biancarosa, Gina, & Snow, Catherine, *Reading Next—A Vision for Action and Research in Middle and High School Literacy*, A Report to Carnegie Corporation of New York, 2<sup>nd</sup> ed., p. 1 (2006).

<sup>20</sup> *Id.*

<sup>21</sup> Council of Chief State School Officers (CCSSO) and the National Governors Association (NGA), Common Core State Standards Initiative, Common Core State Standards for English Language Arts & Literacy in History/Social Studies, Science, and Technical Subjects, Appendix A, p. 2 (2010).

<sup>22</sup> The Reading League, *Science of Reading: Defining Guide* (2021).

Americans have deficits in other kinds of literacy skills as well. In a study cited by the National Communication Association, 95 percent of respondents reported “some degree of anxiety about communicating with a person or in groups.”<sup>23</sup> Furthermore, when 3000 corporate managers were asked about what they feared most, 41 percent answered “speaking in front of a group.”<sup>24</sup>

Another documented area of deficiency is writing. High school graduates who have difficulty with writing will not be successful in college. In fact, “(a) recent study by ACT (2005) revealed that about a third of high school students intending to enter higher education do not meet readiness benchmarks for college-level English composition courses (among certain ethnic groups, 50% or more of adolescents do not meet ACT benchmarks).”<sup>25</sup> This makes it unlikely that they will earn a grade of C or better in this basic first-year course (a core requirement in most undergraduate programs). In Minnesota, only 61% of 2019 ACT-tested high school graduates met English readiness benchmarks. In the K–12 classroom, few students report doing much writing at all, and most teachers report not having students write often or write long pieces. In fact, “(f)orty percent of 8th graders and only 30 percent of 12th graders report writing essays requiring analysis or interpretation at most a few times a year.”<sup>26</sup> Lastly, according to an Achieve, Inc. 2005 survey, 35 percent of high school graduates in college and 38 percent of high school graduates in the workforce feel their writing does not meet expectations for quality. This same survey found that college instructors estimate that half of all high school graduates are not prepared for college-level writing.<sup>27</sup>

The fiscal impacts of the national literacy crisis are staggering. The National Reading Panel Report found that the cost to taxpayers of adult illiteracy is \$224 billion per year and that U.S. companies lose nearly \$40 billion annually because of illiteracy.<sup>28</sup> Fixing writing deficiencies on the job costs American corporations nearly \$3.1 billion.<sup>29</sup> Biancarosa and Snow conclude that the “emotional, social and public health costs of academic failure ... and the consequences of the national literary crisis are too serious and far-reaching for us to ignore.”<sup>30</sup>

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<sup>23</sup> Brinkley, Ellen & Harper, Nancy, *The College Board English Language Arts Framework*, The College Board (November 14, 2007) (citing Richmond & McCroskey, *Communications: Apprehension, Avoidance and Effectiveness*, In *National Communication Association, Speaking Listening, and Media Literacy-Standards for K-12 Education* (1995)), available at: <https://tillamookbaycc.edu/wp-content/uploads/2017/04/College-Board-ELAFramework.pdf> (last visited March 4, 2022).

<sup>24</sup> *Id.* citing Wiliford, J.D., *You Gotta BE the Book: Teaching Engaged and Reflective Reading With Adolescents* (2002).

<sup>25</sup> Graham & Perin, *supra* note 6, at p. 9.

<sup>26</sup> Alliance for Excellent Education, *Making Writing Instruction a Priority in American’s Middle and High Schools—A Policy Brief*, p. 3 (2007) (citing Applebee, A., & Langer, J., *The State of Writing Instruction in America’s Schools: What Existing Data Tell Us*, Center for English Learning & Achievement (CELA) (2006)).

<sup>27</sup> Graham & Perin, *supra* note 6 at p. 7.

<sup>28</sup> A Report of the National Reading Panel, *Teaching Children to Read: An Evidence-Based Assessment of the Scientific Research Literature on Reading and its Implications for Reading Instruction*, Reports of the Subgroups, National Reading Excellence Initiative—National Institute for Literacy (December 2000), available at: <https://www.nichd.nih.gov/sites/default/files/publications/pubs/nrp/Documents/report.pdf> (last visited March 4, 2022).

<sup>29</sup> Report of the National Commission on Writing for America’s Families, Schools, and Colleges, *Writing: A Ticket to Work...Or a Ticket Out: A Survey of Business Leaders*, The National Commission on Writing p. 4 (2004), available at: [https://archive.nwp.org/cs/public/download/nwp\\_file/21479/writing-a-ticket-to-work-or-a-ticket-out.pdf?x-r=pcfile\\_d](https://archive.nwp.org/cs/public/download/nwp_file/21479/writing-a-ticket-to-work-or-a-ticket-out.pdf?x-r=pcfile_d) (last visited March 4, 2022).

<sup>30</sup> Biancarosa & Snow, *supra* note 19, at p. 3.

The national literacy crisis is reflected in Minnesota by the reading proficiency scores and by gaps in those scores between student subgroups. The sub-performance of these students is often masked by the fact that overall, Minnesota outperforms the rest of the nation. For example, Minnesota’s class of 2019 had the highest ACT average composite score (English, mathematics, reading, and science) among the states where 50 percent or more students take the ACT.<sup>31</sup> However, while the average ACT score for English was 21.3 for white students tested in Minnesota, that average was 14.9 for the state’s African American students. In Reading, the average was 22.4 for white students, while African American students averaged 16.9. Some may conclude that the poor performance of African American students, and other student subpopulations, is due to their failure to take college prep courses. Indeed, students who take ACT’s recommended “Core” curriculum (four or more years of English and three or more years each of math, social studies, and natural science) tend to score significantly higher on the ACT test. Yet, Minnesota Hispanic and African American students who took the core curriculum actually scored lower on the ACT than their white counterparts who did not even take the core curriculum.<sup>32</sup>

One explanation for the poor performance of students of color who complete their school’s college prep curriculum may be that their schools failed to offer them the same kinds of rigorous learning opportunities experienced by their white classmates. It is possible that these students may be taking college prep courses in name only, with opportunities provided to learn some, but not all, of the knowledge and skills that are typically covered in a college prep curriculum. Another explanation is that although the courses may cover all of the typical college prep content, a number of teachers may be holding some students to a lower performance benchmark. One or both explanations may be true, but in either case, inequities such as these tend to lessen when schools structure their curriculum around clear and rigorous academic standards.<sup>33</sup>

The literacy crisis impacts students at institutions of higher education as well. Within two years of high school graduation, 53 percent of the class of 2008 enrolled in a Minnesota public higher education institution. However, of those public higher education students, 17 percent took a developmental or remedial writing course. Fifteen percent of these students took a developmental reading course.<sup>34</sup>

## Literacy and College and Career Readiness

The following is Minnesota’s vision of college and career readiness:

Embracing a well-rounded view of education is needed to drive educational and workforce goals and policies. Taking many perspectives into consideration, along with stakeholder feedback, the

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<sup>31</sup> ACT, Inc., ACT Midwest Region – Chicago Office, *ACT Average Composite Scores for States Testing 50 percent or More, 2010 ACT-Tested Graduates* (table) (August 2010).

<sup>32</sup> ACT, Inc., *ACT Average Composite Score, as reported in ACT Profile Report, Graduating Class of 2010—Minnesota*, ACT Midwest Region – Chicago Office, p. 14 (August 2010).

<sup>33</sup> Pattison, Cynthia, and Berkas, Nancy, *Critical Issue: Integrating Standards into the Curriculum* (2000), available at: <http://www.ncrel.org/sdrs/areas/issues/content/curriculum/cu300.htm> (last visited March 4, 2022).

<sup>34</sup> Minnesota State Colleges and Universities (MNSCU) and the University of Minnesota, *Getting Prepared: A 2010 Report on Recent High School Graduates Who Took Developmental/Remedial Courses, State Level Summary and High School Summer*, p. iii (January 2011), available at: [https://www.minnstate.edu/media/newsreleases/2011/pdf/1\\_getting\\_prepared.pdf](https://www.minnstate.edu/media/newsreleases/2011/pdf/1_getting_prepared.pdf) (last visited March 4, 2022).

Minnesota CCR Work Group developed a holistic vision of career and college readiness: A sufficiently prepared student is one who has the knowledge, skills, mindset, and experiences in the academic, workplace, and personal/social domains to keep learning and, beyond secondary school, to successfully navigate toward and adapt to an economically viable career.<sup>35</sup>

Literacy is a gateway to achievement and opportunity. Thus, it is reasonable to conclude that literacy is closely linked to college and career readiness and professional success. The United States Social Security Administration reports that there are “substantial differences in lifetime earnings by educational attainment.”<sup>36</sup>

The impact of low reading achievement on students’ readiness for college, careers, and life in general is significant. In fact, illiteracy is highly prevalent in those who come in contact with the juvenile justice system.<sup>37</sup> Thus, low levels of literacy impact not only students but also society.

In addition to the considerable impact on students and society, the literacy crisis has profound implications for the national economy. According to one estimate, “if the literacy levels of U.S. workers were the same as those in Sweden ... (where the percentage of workers at the lowest literacy level is a third of the U.S. percentage), our gross domestic product would rise by an astounding \$463 billion.”<sup>38</sup>

Students who achieve the literacy skills required for college and careers will need high quality, explicit instruction in the primary grades in order to learn to read proficiently. They will also need support to develop their reading skills throughout their K–12 education. As reading develops over time, texts get longer, vocabulary gets more sophisticated, and concepts overlap between disciplines. Research indicates that students who receive concentrated focused support in literacy graduate from high school and attend college in greater numbers.<sup>39</sup> An important first step in providing this support is to align the education system of K–12 standards, curriculum, instruction, and assessment with the academic demands of college and the modern workplace.

## The History of Academic Standards in Minnesota

Minnesota’s history with standards-based initiatives spans more than 20 years. Public schools in the state implemented state academic standards for the first time in 1997 with the state-mandated Profile of Learning. The development of the Profile standards was spurred, in part, by the Elementary and Secondary Education Act

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<sup>35</sup> MDE CCR Resource Guide

<sup>36</sup> Social Security Administration, Research, Statistics & Policy Analysis, *available at*: <https://www.ssa.gov/policy/docs/research-summaries/education-earnings.html>

<sup>37</sup> Rosario, Ruben, *75% Of Inmates Are Illiterate (19% are completely illiterate)*, Invisible Children, *available at*: <http://www.invisiblechildren.org/2010/11/18/75-of-inmates-are-illiterate-19-are-completely-illiterate-ruben-rosario/> (last visited March 24, 2022).

<sup>38</sup> Joftus, Scott, Ed.D, *Every Child a Graduate: A Framework for an Excellent Education for all Middle and High School Students*, pp. 8, 15, and 31 (September 2002).

<sup>39</sup> Annie E Casey Foundation, *Early Warning Confirmed: A Research Update on Third Grade Reading* (2013), *available at*: <https://www.aecf.org/resources/early-warning-confirmed#:~:text=Early%20Warning%20summarized%20the%20early,in%20life%20and%20the%20workforce> (last visited March 24, 2022).

(ESEA) 1994 re-authorization. The ESEA re-authorization required the establishment of statewide academic standards in core content areas.

Over the last 23 years, Minnesota has created or adopted academic standards in nine content areas.<sup>40</sup> In 2003, the Minnesota Legislature repealed and replaced the Profile of Learning with required state academic standards in mathematics, language arts, science, and social studies. This new state law also required state or locally developed academic standards in the arts and locally developed standards in vocational and technical education and world languages.<sup>41</sup> The Legislature required academic standards in order to maintain Minnesota’s commitment to rigorous educational expectations for all students as well as to comply with the 2001 re-authorization of the ESEA, now widely known as the *No Child Left Behind Act of 2001*.<sup>42</sup> In 2004, the Minnesota Legislature adopted legislation that required districts to develop local standards in health and physical education.<sup>43</sup> Most recently, in 2016, the Legislature required state standards for physical education beginning in the 2018–19 school year.<sup>44</sup>

Minnesota state law also requires supporting benchmarks for academic standards in core content areas in grades K–12.<sup>45</sup> Academic standards describe the expectations in learning that all students must satisfy to meet state requirements for credit and graduation.<sup>46</sup> The benchmarks supplement the academic standards and provide details about “the academic knowledge and skills that schools must offer and students must achieve to satisfactorily complete” the standards.<sup>47</sup> Essentially, the benchmarks set forth grade-level specifics for the learning described by the standards.

In 2006, the Minnesota Legislature added a requirement that certain supplemental concepts and skills must be embedded in academic standards in all content areas. This law required that Minnesota’s academic standards be revised to include technology and information literacy standards and college readiness skills and knowledge.<sup>48</sup> The following year, in 2007, the Legislature also added a requirement that standards must also include the contributions of Minnesota American Indian tribes and communities.<sup>49</sup> With the addition of these new elements, the Legislature required all existing academic standards to be reviewed and revised beginning in the 2008–09 school year. The Legislature further required that students satisfy the revised standards, which incorporated the new requirements beginning in the 2011–12 school year.

Since the implementation of the 2009 science standards in the 2011–12 school year, the Legislature has worked to provide systemic structure to the standards review and revision process to allow for regular review and

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<sup>40</sup> Minnesota has standards in arts, science, language arts, social studies, mathematics, physical education, health, career and technical education and world languages. See [Minnesota Rules Chapter 3501](#).

<sup>41</sup> [2003 Minnesota Laws, chapter 129, article 1, section 3](#); [Minn. Stat. § 120B.021 \(2003\)](#); and [Minn. Stat. § 120B.022 \(2003\)](#).

<sup>42</sup> *No Child Left Behind (NCLB)*, [Pub. L. 107-110 \(2002\)](#).

<sup>43</sup> [2004 Minnesota Laws, chapter 294, article 2, section 2](#).

<sup>44</sup> [2016 Minnesota Laws, chapter 189, article 25, section 4](#).

<sup>45</sup> [Minn. Stat. § 120B.021, subd. 1\(6\)](#).

<sup>46</sup> [Minn. Stat. § 120B.023](#).

<sup>47</sup> [Minn. Stat. § 120B.023, subd. 1](#).

<sup>48</sup> [Minn. Stat. § 120B.023, subd. 2 \(2006\)](#) and [2006 Minnesota Laws, chapter 263, article 2, section 3](#).

<sup>49</sup> [Minn. Stat. § 120B.021, subd. 1](#) and [2007 Minnesota Laws, chapter 146, article 2, section 3](#).

revision of the academic standards and the related benchmarks in all content areas. In addition, the Minnesota legislature has demonstrated a commitment to establishing, reviewing, and revising rigorous academic standards for Minnesota’s public school students by providing the commissioner of education with general rulemaking authority for the review and revision of academic standards along with a specific timeline for doing so. This systemic structure ensures that local education agencies understand the duration of the academic standards rules and the process in which they may engage to provide input and guidance.

The following table illustrates the amendments made to [Minnesota Statutes, sections 120B.023 \[2021\]](#) and [Minnesota Statutes, section 120B.021 \[2014\]](#), between 2012 and 2016 as well as any existing statements regarding the Legislature’s intent. The history of these statutes makes clear the Legislature intended the commissioner to have ongoing rulemaking authority in the academic standards content areas.

KEY: ~~stricken~~ = removed, old language. underscored black = added, new language. underscored blue = hyperlink.

Legislative Session	Legislative Changes	Purpose of Change and Evidence of Legislative Intent
2012	<p><a href="#">House and Senate Passed S.F. 1656</a><sup>50</sup>, but this language was vetoed by then-Governor Dayton:</p> <p><u>“<a href="#">Minn. Stat. § 120B.023, Subd. 2 [2021]</a>. <b>Revisions and reviews required:</b></u></p> <p><u>The commissioner must revise and align the state’s academic standards and graduation requirements, consistent with the review cycle established in this subdivision and the requirements of chapter 14, but may proceed to finally adopt revised and realigned academic standards and graduation requirements in rule only after legislation is enacted directing the commissioner to adopt</u></p>	<p><b>Changes Proposed:</b> Language prop to require specific legislative authorization.</p> <p><b>Vetoed by Governor Dayton on May 4, 2012</b>, stating, “This bill would seriously undermine the existing standards review and revision process. Under current law, the process seeks to maximize the input of people with content knowledge and teaching expertise, as well as various stakeholders, while providing multiple opportunities for public input and opinion. It would be very difficult to recruit highly qualified people to serve on the standards committee if they knew the Legislature would then review, approve, or change the standards they worked so diligently to create. I am also concerned about the additional delays this bill would force upon standards development and implementation timelines, which could cause losses of federal funding and additional costs to school districts. Applications for federal funds typically require a state to commit to a standards and assessment revision timeline. Districts align their curriculum adoption</p>

<sup>50</sup> [Proposed 2012 Minnesota Laws, Senate File 1656](#). Vetoed by Governor Dayton, May 2012. [See Governor Dayton’s Veto Letter to Senator Fischbach, dated May 4, 2012](#); Minnesota Senate Journal, p. 6999 (May 7, 2012), available at: <https://www.senate.mn/journals/gotopage.php?session=ls87&number=6999> (last visited March 4, 2022).



Legislative Session	Legislative Changes	Purpose of Change and Evidence of Legislative Intent
	<p><u>the academic standards or graduation requirements in rule.</u><sup>51</sup></p>	<p>calendars to the state’s standard schedule under <a href="#">Minn. Stat. § 120B.023 [2021]</a>. The timeline is very tight. Adding an additional review process could considerably lengthen the amount of time it would take to develop the standards, which in turn would make it difficult for districts to align, purchase, or create new curriculum to train their teachers and to implement the standards. Finally, this bill would disrupt the efficient functioning of state government, by assigning a role to the Legislative Branch, which is the responsibility of the Executive Branch. Academic standards are numerous and detailed. They can take a year or more to discuss, consider, and review by the committee of experts, including teachers, academics, and business leaders. The process culminates in a detailed administrative rulemaking process that provides further opportunities for input by everyone concerned about the outcome. It would be non-productive at best, and counter-productive at worst, to overlay a legislative review process on top of this process, which has been carefully designed and fine-tuned by legislators and administrations from both parties.”<sup>52</sup></p> <p><b>MDE Comment:</b> The governor was necessarily concerned about imposing a second layer of legislative review over the commissioner’s detailed standards process.</p>
2013	<p><a href="#">House, Senate, and Governor’s office passed and signed into law H.F. 630.</a><sup>53</sup></p>	<p><b>Relevant Changes Made:</b> <a href="#">Minn. Stat. §120B.023 [2021]</a> amended to provide both review and revision (revision was new) on a 10-year cycle for all content areas and to move away from fixed content area implementation dates. The change also moved</p>

<sup>51</sup> [Minn. Stat. § 120B.023, subd. 2 \(2012\)](#).

<sup>52</sup> Governor Dayton’s Veto Letter, *supra* note 50.

<sup>53</sup> [Minnesota 2013 Laws, chapter 116, article 2, section 3.](#)

Legislative Session	Legislative Changes	Purpose of Change and Evidence of Legislative Intent
	<p>“<a href="#">Minn. Stat. § 120B.023, Subd. 2 [2021]</a>. <b>Revisions and reviews required.</b></p> <p>(a) The commissioner of education must revise and appropriately embed technology and information literacy standards consistent with recommendations from school media specialists into the state’s academic standards and graduation requirements and implement a <del>review</del> <u>ten-year cycle for to review and revise</u> state academic standards and related benchmarks, consistent with this subdivision. During each <u>ten-year review and revision</u> cycle, the commissioner also must examine the alignment of each required academic standard and related benchmark with the knowledge and skills students need for <u>career and college</u> readiness and advanced work in the particular subject area. <u>The commissioner must include the contributions of Minnesota American Indian tribes and communities as related to the academic standards during the review and revision of the required academic standards.</u></p> <p>(c) <del>The commissioner in the 2007–2008 school year must revise and align the state's academic standards and high school graduation requirements in the arts to require that students satisfactorily complete the revised arts standards beginning in the 2010–2011 school year. The commissioner must implement a</del></p>	<p>graduation requirements to <a href="#">Minn. Stat. § 120B.024 [2021]</a> to focus this section on standards revision and review. The amendments moved the concept of “revision” from the individual content areas to the general opening paragraph (which applies to all content areas) and set 10-year timelines for review of each content area.</p> <p><b>MDE Comment:</b> The Legislature gave the Department flexibility to set implementation dates for each content area as part of the rulemaking process. The ten-year cycle, which includes both review and revision, also eliminated the need for the commissioner to come back to the Legislature to seek specific authority for standards rulemaking. The Legislature anticipated that the commissioner would conduct content area rulemaking during the years set forth in the updated timelines.</p>

Legislative Session	Legislative Changes	Purpose of Change and Evidence of Legislative Intent
	<p>review of the academic standards and related benchmarks in arts beginning in the 2016–2017 school year.”<sup>54</sup></p>	
2014	<p><a href="#">House, Senate, and Governor’s office passed and signed into law H.F. 2397</a><sup>55</sup></p> <p>“<a href="#">Minn. Stat. § 120B.021, Subd. 4 [2021]</a>. <b>Revisions and reviews required.</b></p> <p>(a) The commissioner of education must revise and appropriately embed technology and information literacy standards consistent with recommendations from school media specialists into the state’s academic standards and graduation requirements and implement a ten-year cycle to review and, <i>consistent with the review, revise state academic standards and related benchmarks, consistent with this subdivision</i>. During each ten-year review and revision cycle, the commissioner also must examine the alignment of each required academic standard and related benchmark with the knowledge and skills students need for career and college readiness and advanced work in the particular subject area. The commissioner must include the contributions of</p>	<p><b>Changes Made:</b> This amendment moved the required standards revision and review from <a href="#">Minn. Stat. § 120B.023 [2021]</a> to <a href="#">Minn. Stat. § 120B.021 [2021]</a>. It also clarified that any revisions must be consistent with the accompanying review and specified an ongoing ten-year cycle for review for arts (and all other) standards.</p> <p><b>MDE Comment:</b> This amendment makes clear that the Legislature contemplated both review and revision as part of the ten-year cycle. Consistent with the governor’s veto concerns in 2012, the Legislature did not intend for the commissioner to go to the effort of conducting a thorough review of the standards without having the authority to then revise the standards through the rulemaking process.</p>

<sup>54</sup> [Minn. Stat. § 120B.023, Subd. 2 \(2013\)](#).

<sup>55</sup> [2014 Minnesota Laws, chapter 272, article 3, section 3](#).

Legislative Session	Legislative Changes	Purpose of Change and Evidence of Legislative Intent
	<p>Minnesota American Indian tribes and communities as related to the academic standards during the review and revision of the required academic standards.</p> <p>... (c) The commissioner must implement a review of the academic standards and related benchmarks in arts beginning in the 2016–2017 school year and <u>every ten years thereafter</u>.”<sup>56</sup> (emphasis added)</p>	
2016	<p><a href="#">House, Senate, and Governor’s office passed and signed into law H.F. 2749</a><sup>57</sup></p> <p>“<a href="#">Minn. Stat. § 120B.021, Subd. 4 [2021]</a>. <b>Revisions and reviews required.</b></p> <p>(c) The commissioner must implement a review of the academic standards and related benchmarks in arts beginning in the <del>2016–2017</del> <u>2017–2018</u> school year and every ten years thereafter.”<sup>58</sup></p>	<p><b>Changes Made:</b> Added a requirement for the development of physical education standards, thus delaying each of the content standards reviews by one year.</p> <p><b>MDE Comment:</b> This change did not affect the general scope of the commissioner’s ongoing rulemaking.</p>

## History of English Language Arts (ELA) Academic Standards and ELA Education Requirements in Minnesota

In 2003, following the repeal of the Profile of Learning, the commissioner submitted proposed standards in English language arts to the Legislature. The Legislature approved the standards proposed by the commissioner.

<sup>56</sup> [Minn. Stat. § 120B.021, subd. 4 \(2014\)](#).

<sup>57</sup> [2016 Minnesota Laws, chapter 189, article 25, section 4](#).

<sup>58</sup> [Minn. Stat. § 120B.021, subd. 4 \(2016\)](#).

Full implementation of the standards in all schools was scheduled for the 2004–05 school year. Schools continued to implement the 2003 standards until they were revised in the 2009–10 school year.

Legislation passed in 2006 requires that Minnesota’s academic standards be revised to reflect an increased level of rigor that prepares students with the knowledge and skills needed for success in college and the skilled workplace. This legislation also establishes requirements for revising state academic standards in each subject and directs MDE to revise these state academic standards.<sup>59</sup>

The K–12 academic standards in English language arts were last revised during the 2009–10 school year, with all schools implementing and all students satisfactorily completing the revised standards by the 2012–13 school year.

In 2015, the graduation requirements were further revised to clarify the role of the standards in the graduation requirements.<sup>60</sup> The current graduation requirements in English language arts are set out in Minnesota Statutes section 120B.024 as follows:

**120B.024 CREDITS.**

**Subdivision 1. Graduation requirements.** (a) Students beginning 9th grade in the 2011–2012 school year and later must successfully complete the following high school level credits for graduation:

- (1) four credits of language arts sufficient to satisfy all of the academic standards in English language arts ...<sup>61</sup>

## The Role of Quality Standard and Benchmark Statements

The Minnesota K–12 Academic Standards are the statewide expectations for student learning in K–12 public schools. The standards and benchmarks identify the knowledge and skills that all students must achieve in a content area by the end of a grade level or grade band.

Minnesota Statutes defines the terms “Academic Standard” and “benchmark.” “Academic Standard” is defined as “a summary description of student learning in a required content area under section 120B.021 or elective content area under section 120B.022.”<sup>62</sup> The term “benchmark” is defined as a “specific knowledge or skill that a student must master to complete part of an academic standard by the end of the grade level or grade band.”<sup>63</sup>

The academic standards are the rule language that is proposed and adopted through the formal rulemaking process. The benchmarks, according to Minnesota Statutes, section 120B.023, subdivision 1, “supplement (the) required state academic standards.” High school career and college-ready benchmarks may cover more than

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<sup>59</sup> [Minn. Stat. § 120B.021, subd. 4. \[2021\]](#)

<sup>60</sup> [Minnesota Session Laws – 2015, 1<sup>st</sup> Special Session, H.F No. 1.](#)

<sup>61</sup> [Minn. Stat. § 120B.024, subd. 1\(a\)\(1\) \[2021\].](#)

<sup>62</sup> [Minn. Stat. § 120B.018, subd. 2 \[2021\].](#)

<sup>63</sup> [Minn. Stat. § 120B.018, subd. 3. \[2021\]](#)

one grade. Schools must offer and students must achieve all benchmarks for an academic standard to satisfactorily complete that state standard.<sup>64</sup> School districts determine how their students will meet the standards and benchmarks by developing courses and curriculum and choosing teaching methods.

MDE has criteria for quality standard and benchmark statements in all content areas. These were developed in 2003 by the department to provide guidance to standards review committees regarding important qualities of standards and benchmarks to ensure that the standards and benchmarks are ultimately clear, consistent, and useable. These criteria are reviewed prior to each standards revision cycle used by all content standards committees to promote coherence and consistency. These criteria apply to both the standards and benchmarks because the commissioner must supplement required state academic standards with grade-level benchmarks.<sup>65</sup> The dual applicability of these criteria also enables the standards and benchmarks to work together to support curriculum development and promote high-quality learning. The department's quality criteria for standards and benchmarks were adapted from *Creating Aligned Standards and Assessment Systems* by Stanley Rabinowitz, Ed Roeber, Cheryl Schroeder, and Jan Sheinker.<sup>66</sup> The criteria for quality standard and benchmark statements in all academic content areas are:

- The standards should reflect a developmental progression, meaning that they provide a clear sense of increased knowledge and sophistication of skills from one grade level to the next.
- Standards should be useful for defining and supporting good instruction.
- All standards and benchmarks should be able to be assessed at the classroom or district level (e.g., paper and pencil tests, projects, teacher observations, and other classroom-based assessments). Standards and benchmarks should have verbs that indicate assessable action. If an anchor standard approach is utilized, only the benchmarks, rather than the standards and benchmarks, should be assessable at the classroom or district level.
- Standards and benchmarks should be an appropriate "grain size": Standards should be specific enough to provide direction for assessment and to guide curriculum but broad enough to capture the "big ideas" (i.e., the major concepts and essential skills) and to allow for a variety of curriculum approaches. Each benchmark should be limited to one concept or skill, and the concept or skill should be substantive enough to require more than one class period to teach it.
- The knowledge and skills of the content should be reflected in a manageable number of standards and benchmarks.
- There should be consistency in the "grain size" of standards and benchmarks.
- There should be consistent use of terminology within a content area.

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<sup>64</sup> [Minn. Stat. § 120B.023 \[2021\]](#).

<sup>65</sup> [Minn. Stat. § 120B.023 \[2021\]](#).

<sup>66</sup> Rabinowitz, Stanley, Ph.D., Roeber, Ed, Ph.D., Schroeder, Cheryl, Ed.D., & Sheinker, Jan, Ed.D., with the CAS SCASS Study Group: Transitions in Assessment from IASA to NCLB, *Creating Aligned Standards and Assessment Systems*, available at: <https://studylib.net/doc/18079491/creating-aligned-standards-and-assessments> (last visited March 4, 2022).

# Overview and Organization of the Current 2010 K–12 Academic Standards in English Language Arts

## Overview

The 2010 K–12 English language arts standards are unique in that the timing of this review and revision process coincided with the development of the Common Core State Standards initiative. Minnesota actively participated in the development of the Common Core State Standards by providing feedback to the National Governors Association (NGA) and the Council of Chief State School Officers (CCSSO) standards team. The feedback provided by the Minnesota focus groups to the Common Core State Standards writers addressed deficiencies Minnesota representatives saw in the Common Core standards and benchmarks, as well as support for common core standards that addressed concepts and skills identified as essential to English language arts education in Minnesota. When the final draft was sent to MDE, the feedback team supported Minnesota’s adoption of the Common Core State Standards as a basis for the soon-to-be drafted 2010 English Language Arts Standards. As soon as Minnesota decided to adopt the Common Core State Standards, MDE began the revision of the Minnesota state ELA standards. The current 2010 K–12 English language arts standards include additions to the Common Core Standards that were reflective of Minnesota statutes and best practice in the field at the time.

## Common Core Basis for the 2010 K–12 Academic Standards in English Language Arts

Given that the Common Core State Standards were to be the basis for the 2010 English Language Arts Standards, the 2010 Committee used the structural framework determined by the Common Core State Standards writing team. This framework included four strands: 1) Reading, 2) Writing, 3) Speaking, Viewing, Listening and Media Literacy, and 4) Language. Each of the main four strands that are part of the Common Core State Standards has College and Career Readiness (CCR) anchor standards associated with them; that is, standards that are anchored in college and career readiness. The Reading and Writing strands each have 10 anchor standards. The Speaking, Viewing, Listening and Media Literacy strand has eight anchor standards, and the Language strand has six anchor standards. The CCR and grade-specific standards complement each other. The CCR standards provide broad standards, and the grade-specific standards provide additional specificity. The combinations of these standards define the skills and understandings that all students must demonstrate in each of the four strands.

States that adopted the Common Core State Standards were required to adopt them in their entirety. States could then add up to 15 percent more content to make the standards state specific. During the review process, the revision committee added language to the Common Core standards to make them Minnesota specific and to account for Minnesota state statutory requirements, such as the inclusion of American Indians in the standards. Rather than being delivered as separate entities, the current English language arts standards are designed to be woven together and taught in unison.

## Organization of 2010 ELA Standards

The current 2010 English language arts standards and supporting benchmarks are grade specific at the K–8 level. They contain learning expectations tied to each specific grade level from kindergarten through grade 8. In the grades 6–12 English language arts standards and supporting benchmarks, the benchmarks are grouped into

grade bands 9–10 and 11–12. In the grades 6–12 Literacy in History/Social Studies and Science and Technical Subjects, they are organized in grade bands 6–8, 9–10, and 11–12. The grade bands allow individual school districts to teach the standards in the same grade levels as presented in the statewide standards or in different grade levels within the grade band if desired, so long as all standards are mastered by the end of the grade band. The 2010 K–12 English language arts standards were to be implemented by the 2012–13 school year.

## The Review and Revision Process for the Minnesota 2020 K–12 Academic Standards in English Language Arts

### Overview

This section of the SONAR will describe the preliminary work conducted by MDE as well as the process of the review and revision work engaged in by the Minnesota K–12 English Language Arts Standards Committee. This review and revision process included the following:

- Development of assumptions
- Surveying educators on the current ELA standards
- Application and selection process of the Committee
- Gap analysis
- Review of educational research
- Drafting of Career and College Readiness Statement
- Drafting of standards and benchmarks
- Conducting Town Halls and gathering public feedback
- Solicitation of Expert Reviewer Feedback
- Review and approval by the Commissioner of Education

### Development of the Assumptions to Guide the Standards Review

Consistent with the statutory requirement to review and revise standards on a 10-year cycle under Minnesota Statutes, section 120B.021, subdivision 4, MDE began preliminary work in the spring of 2019 to prepare for the formal English language arts standards review. As part of the preliminary review and revision work, MDE leadership wrote a set of *Assumptions for Guiding the English Language Arts Standards Committee’s Work* that would support the formal standard review process. These Assumptions were approved by the Commissioner of Education.

### Requirements and Assumptions

These assumptions were a combination of statutory requirements, committee membership expectations, the review process, and content-specific parameters within which the Committee would work.

#### Statutory requirements include:

- The standards and benchmarks should be aligned with the knowledge and skills needed for career and college readiness ([Minn. Stat. § 120B.021, subd. 4\(a\) \[2021\]](#)).



- The standards and benchmarks must “be clear, concise, objective, measurable, and grade-level appropriate” as well as “not require a specific teaching methodology or curriculum” ([Minn. Stat. § 120B.021, subd. 2 \[2021\]](#)).
- The revised standards will include both standards (academic learning goals) and grade-level benchmarks (“academic knowledge and skills that school must offer and students must achieve to satisfactorily complete a standard”) ([Minn. Stat. § 120B.023, subd. 1 \[2021\]](#)). The standards and benchmarks must identify the learning that is to be mastered by all students by the end of each grade level in grades K–8 and one or more grade bands in grades 9–12.
- The committee “must include the contributions of Minnesota American Indian tribes and communities as they relate to the academic standards during the review and revision of the required academic standards” ([Minn. Stat. § 120B.021, subd. 1 \[2021\]](#)).

### **Committee membership and expectations:**

- The standards review committee will represent stakeholders in the following areas:
  - Teachers, administrators, higher education, business/industry, and citizens.
  - Content specialists with expertise across all developmental levels (PreK, K–2, 3–5, 6–8, 9–12).
  - Content specialists with expertise across all domains of English language arts.
  - Diverse educational settings: traditional public schools, charter schools, alternative learning centers; urban, suburban, and rural communities.
  - Diverse backgrounds and experiences: racial and linguistic diversity.

### **Review process:**

- The committee will review public input, such as from town hall meetings, focus groups, or electronic surveys.
- The committee will study exemplary standards from other states and countries as well as state, national, and international assessment frameworks and data.
- The standards will be coherently aligned with those of other K–12 content areas and the Minnesota early learning standards (that is, the Early Childhood Indicators of Progress Standards).
- The knowledge and skills described in the following documents must be integrated into the state’s English language arts standards:
  - Technology and information literacy standards must be embedded into the standards in each content area. This may include standards from sources such as the Information and Technology Educators of Minnesota (ITEM) and International Society for Technology in Education (ISTE).
  - Computer science concepts and skills must be integrated into the standards as appropriate. This may include standards from sources such as the *Computer Science Teachers Association Standards*.

### **ELA standards expectations include:**

- The standards must be grounded in current research and reflect a comprehensive, balanced, and developmentally appropriate approach to prepare students in the areas of reading and language arts.
- The committee must take into account opportunities related to diversity and equity, including:
  - Designing standards that provide students with multiple ways of demonstrating competence in English language arts.
  - Designing standards using language that promotes culturally sustaining learning.

- Avoiding all reference to specific curricular content (that is, authors or works) within standards and benchmarks because such references necessarily both elevate and exclude perspectives and cultures.
- The committee “must include the contributions of Minnesota American Indian tribes and communities as they relate to the academic standards during the review and revision of the required academic standards.”<sup>67</sup>

## Public Survey on Current ELA Standards

An online survey was generated by MDE staff and posted to the MDE website from March 5–20, 2019, to gather feedback on the 2010 Minnesota K–12 English Language Arts Standards. This seventeen-question survey gathered feedback in the following areas: general feedback, standards implementation, and standards and benchmarks. This online survey resulted in almost 500 responses from various stakeholders across the state, including educators, staff, parents, and community members. Some members of the public, including Minnesota educators, sent their feedback by email directly to the Academic Standards and Instructional Effectiveness Division staff. The survey results were reviewed by the Committee, and this valuable feedback was reviewed as part of the analysis and revision process.

## Application Process and Selection of Committee Members

MDE issued a call for English Language Arts Standards committee members to establish a highly qualified, diverse committee that understands best practices and research in ELA as well as the broad range of student needs across Minnesota. Candidates were required to read and commit to the *Assumptions for Guiding the Standards Committee’s Work (Assumptions)* and the *Standards Review Timeline*. Committee applications were accepted from April 15 through May 3, 2019, and resulted in approximately 124 interested applicants. After an extensive review process, which included agency staff reviewing each application to ensure a broad range of representation and expertise, the Commissioner reviewed the proposed candidates and approved thirty-four highly qualified members to serve on the Committee with four designated co-chairs.

## The Minnesota K–12 English Language Arts Standards Review Committee

The review and revision process was driven by the work of a dedicated and knowledgeable English Language Arts Standards Review Committee (the Committee). The Committee, which dedicated thirteen months to this process, consisted of PreK–12 English language arts teachers; curriculum leaders and instructional coaches; postsecondary reading, writing, and English language arts instructors and faculty; business and community representatives; and parents.

### Selected Committee Expertise

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<sup>67</sup> [Minn. Stat. § 120B.021, subd. 1. \[2021\]](#)

In addition to knowledge of English language arts content and pedagogy spanning the PreK–12 grade levels, members brought to the Committee expertise that included supporting and teaching students with special needs, English language learners, economically disadvantaged students, early childhood learners, alternative education students, gifted and talented students, American Indian students, and both urban and rural students. Higher education faculty members brought experience in teacher preparation programs, including courses in reading, writing, and English language arts; graduate level literacy and leadership programs; and Career and Technical Education courses in business and technology. Committee members represented community and professional organizations, businesses, and the Tribal Nations Education Committee (TNEC) and came from a wide variety of geographical locations around the state as well as from a wide range of school districts and community sizes.

## **Review and Revision Process**

### **Overview**

The Assumptions and Timeline for the review of the Minnesota K–12 English Language Arts standards included the following: the review of public feedback, the study of exemplary standards from other states and countries as well as national assessment frameworks, the alignment of other K–12 content areas and the Early Childhood Indicators of Progress Standards (ECIPS), and the embedding of skills and knowledge from Information and Technology Educators of Minnesota (ITEM), International Society for Technology in Education (ISTE), and computer science concepts and skills integration. The Committee engaged in this thirteen-month review and revision process from July 2019 through August 2020. This section of the SONAR describes the process that was used to review and—consistent with the review—revise the current 2010 ELA standards and related benchmarks. This section also explains the role and work of the Committee, the research literature, the vision of career and college readiness, the review of other state and international ELA standards, and the analysis of public and expert reviewer feedback.

### **Work of the Committee**

The full Committee met for the first time at the Minnesota Department of Education in July 2019 to begin the review and revision work. Several members of the Committee volunteered to serve on Technical Writing Teams, sub-sets of the Committee charged with writing initial drafts of the revised standards and supporting benchmarks. The Committee as a whole met twelve times to review feedback and provide direction to the Technical Writing Teams. These writing teams, typically facilitated by one of the co-chairs, met during and between meetings of the full Committee and revised the draft standards according to direction provided by the Committee.

While the Committee began their work in a face-to-face environment, by March 2020 the work moved to a virtual platform due to COVID-19. Although the Committee experienced a slight delay, the dedication of this Committee to the revision process was not compromised, and the members adapted to the new situation while forging ahead to develop each new draft with a final draft being presented to and approved by the Commissioner in January 2021.

## Gap Analysis

The Committee began its official review of the 2010 K–12 Academic Standards in ELA by conducting a gap analysis. The gap analysis is a process that compared the current ELA standards with other documents in order to determine content, knowledge, skills, and philosophies that the current standards lacked (i.e., gaps). The goal of this analysis was for the Committee to understand the philosophical underpinnings and organizational frameworks of the 2010 Minnesota K–12 Academic Standards in ELA and the relationship to the Common Core State Standards in ELA. The gap analysis helped determine areas of strength and improvement for Minnesota’s 2010 ELA standards by reviewing online feedback and analyzing national assessment frameworks, national standards documents, reports of national significance, and standards from other states and countries for English language arts.

Two main national research sources were carefully reviewed by the Committee as part of the gap analysis: 1) the *Reading Framework for the 2017 National Assessment of Educational Progress (NAEP)* and 2) the ACT College and Career Readiness Standards. These two critical resources are briefly described below.

The NAEP is the ongoing national indicator of what American students know and can do. The NAEP Reading Framework regularly collects achievement information on representative samples of students in grades 4, 8, and 12. The information NAEP provides about student achievement helps the public, educators, and policymakers understand strengths and weaknesses in student performance and make informed decisions about education. This framework was used as a “road map,” illustrating a progression of learning at each cognitive level, to help inform the committee about the specific reading skills and knowledge students need in order to achieve the content standards.<sup>68</sup>

The ACT College and Career Readiness Standards, which were developed using empirical research, describe essential skills and knowledge students need to become ready for career and college and serve as a link between what students have learned and what they are ready to learn next. The two research-based components include:

1. The standards describing what students should know and be able to do at various ACT score ranges that are based on analysis of thousands of actual student responses across multiple test forms developed from the test blueprints.
2. The progression across ACT score ranges providing an empirical indicator of whether students are performing well enough in relation to those standards to be considered ready for postsecondary opportunities.

These components and longitudinal data extending into postsecondary education allow ACT to empirically validate the ACT College and Career Readiness Standards, describing requisite skills and performance levels for

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<sup>68</sup> Reading Framework for the 2017 National Assessment of Educational Progress Executive Summary, p. iii (January 2017), available at: <https://www.nagb.gov/content/dam/nagb/en/documents/publications/frameworks/reading/2017-reading-framework.pdf> (last visited March 4, 2022).

postsecondary readiness.<sup>69</sup> These standards informed the ELA Career and College Readiness Statement which was used as a “north star” in directing and aligning the work of the standards review and revision process to ensure that Minnesota students who master the ELA content standards and benchmarks will be prepared for success in the multiple pathways available to them after high school.

## Review of National and International ELA Standards

The Committee also carefully compared Minnesota’s 2010 English language arts standards with recently developed language arts standards from other states, including Oklahoma and Virginia, as well as internationally from other countries, including New South Wales, Australia, and Alberta, Canada. These state and international standards were carefully reviewed independently and as a whole.

The standards from Oklahoma were selected because of their guiding principles, which include acquiring language arts knowledge and skills as a recursive learning endeavor (i.e., meaning that students revisit concepts again and again as they use language at increasingly sophisticated levels). The recursive learning process aligns with best practices in the literacy field and provides an expectation that skills are both repeated and applied to increasingly more complex texts. This recursive process addresses how rigor increases within the progression of standards and demonstrates how the Minnesota ELA standards for reading skills supports the development of writing skills and the writing standards support the development and refinement of reading skills. Because of this recursive learning process, language arts learning will not progress for students in the strictly linear way it may in other content areas. These standards were reviewed because they include rigorous content where students engage in analysis, synthesis, evaluation, and creativity. They include foundational reading skills and a writing process and highlight reciprocity between reading and writing. The Oklahoma ELA standards were also written by teams of educators, just as Minnesota’s academic standards are, and they provide measurable goals, benchmarks, and learning progressions, which are all required components of the Minnesota ELA standards. These standards were not adaptations of the Common Core State Standards (CCSS). Rather, they demonstrated a clear effort and shift to include current literacy research and practices that have developed over the last decade. The Oklahoma ELA standards were an exemplar for the work and outcomes in which the committee engaged.

The Virginia ELA standards were selected for review because Virginia was one of the few states that did not adopt the Common Core standards but rather created ELA standards specifically for their state’s needs. These standards include the strands of Communication and Multimodal Literacies, Reading, Writing, and Research. The structure of the Virginia standards includes learning progressions that describe the essential understandings and the essential knowledge, skills, and processes for grades K–12, which is also required for the Minnesota ELA standards. The Virginia standards highlight the foundational skills of oral language, phonological and phonemic awareness, print concepts, phonics, vocabulary and word use, and comprehension. Virginia’s standards also included student choice, variety in text selections of both fiction and nonfiction, and text selections that fulfill a social or cultural function. The writing standards emphasize persuasion and analysis in writing and a focus on

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<sup>69</sup> Clough, Sara & Montgomery, Scott, *How ACT Assessments Align with State College and Career Readiness Standards*, ACT (2015), available at: <https://www.act.org/content/dam/act/unsecured/documents/Alignment-White-Paper.pdf>.

topic, audience, and purpose as well as the use of technology and media. Virginia was also ranked in the top ten student proficiency score averages by the National Assessment of Educational Progress (NAEP) in 2019. The Virginia ELA standards were chosen for review because their structure was different from that of the 2010 Minnesota standards and because they highlighted foundational reading skills and writing skills that aligned with Minnesota statutory requirements.

The international ELA standards from New South Wales, Australia, and Alberta, Canada were selected as examples of recently revised English-based language arts standards that were innovative and interesting, incorporated the inclusion of cultural heritage and identity, and provided an explanation of native inclusion within their guidance. The ELA assumptions include the expectation that the Committee must take into account opportunities related to diversity and equity, including the use of language that promotes culturally sustaining learning. Similarly, the Minnesota ELA standards are required by state statute to include the contributions of Minnesota American Indian tribes and communities as they relate to the academic standards during the review and revision of standards. These international ELA standards were specifically reviewed by the Committee because of the assumptions and statutory requirements highlighted above and also because the standards were inclusive of multilingual learners and addressed the components of listening, speaking, reading, writing, viewing, and representing within their strands, which aligned to the current Minnesota ELA standards.

## Career and College Readiness Statement

Minnesota Statutes require academic standards and supporting benchmarks in each content area to be aligned with the knowledge and skills students need for career and college readiness and advanced subject area work.<sup>70</sup> As a result, the development of a Career and College Readiness Statement (CCRS) is a key step in the revision of each content area's standards review process. This statement becomes the vision, or "north star," for the Committee's review and revision of the ELA academic standards. The Career and College Readiness Statement for English language arts articulates the knowledge and understandings necessary for every student to be prepared for post-secondary success and personal fulfillment.

To begin the creation of a Career and College Readiness Statement for ELA, the Committee as a whole reviewed several documents provided by MDE. These documents include the following:

- *Career and College Readiness Resource*, MDE, 2018<sup>71</sup>
- *The Condition of College and Career Readiness 2018*, ACT, 2018<sup>72</sup>
- *A Complete Definition of College and Career Readiness* by David T. Conley, Educational Policy Improvement Center, 2014<sup>73</sup>

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<sup>70</sup> [Minnesota Statutes, section 120B.021, subd. 4 \[2021\]](#).

<sup>71</sup> MDE, Career and College Readiness Resource Guide (2018), available at: <https://education.mn.gov/MDE/dse/ccs/> (last visited March 24, 2022).

<sup>72</sup> ACT, The Condition of College and Career Readiness—National (2018), available at: <https://www.act.org/content/act/en/research/reports/act-publications/condition-of-college-and-career-readiness-2018.html> (last visited March 4, 2022).

<sup>73</sup> Conley, David T., Ph.D., *A Complete Definition of College and Career Readiness*, Educational Policy Improvement Center (May 2, 2012), available at: <https://files.eric.ed.gov/fulltext/ED537876.pdf>.

- *Students Who are College and Career Ready in Reading, Writing, Speaking, Listening and Language, Common Core Standards, 2010*<sup>74</sup>

Following the document review, the Committee provided input and feedback to the technical writing team. This team then developed the Career and College Readiness Statement. The committee relied on the Career and College Readiness Statement while reviewing and revising standards and benchmarks. The full statement is included below.

## Career and College Readiness Statement

Career and college ready students are effective and critical consumers and producers of ideas, who are able to successfully function in and contribute as citizens to their local and global communities. Post-secondary success and personal fulfillment demands that individuals have a broad foundation of language and literacy skills and are able to transfer these skills and apply learning in order to:

- **demonstrate their understanding, value, and respect of other perspectives, identities, and cultures.** They understand their own perspectives, identities, and cultures in relation to those of others; they engage with a wide variety of texts with a diverse representation of perspectives, identities, and cultures like and unlike their own; they are inclusive of others. They are conscious and critical of their own biases and those of larger society.
- **become self-directed learners who value expanding knowledge, skills, and understanding through literacy.** They are able to express themselves clearly and creatively; they reflect on their learning and revise their own thinking; they persevere in the face of educational challenges; they read purposefully and listen attentively to gain both general knowledge and discipline-specific expertise; they read a wide variety of self-selected texts for personal fulfillment; and they are lifelong learners who value knowledge.
- **possess effective learning and work behaviors.** They advocate for themselves; they are able to problem-solve; they comprehend as well as critique texts; they make informed decisions; they give and utilize constructive criticism; and they communicate and collaborate with others.
- **build and communicate strong content knowledge.** They adjust to, interact with, and interpret a wide variety of texts, including but not limited to informational, fictional, technical, and procedural; they synthesize information to articulate their thinking; they refine and share their knowledge; and they respond to the varying demands of audience, task, purpose, and discipline.
- **become responsible digital citizens.** They are critical consumers of information; they analyze and evaluate sources; they honor intellectual property; they find, use, and value credible evidence; they create and interact with content responsibly; they demonstrate safe and responsible use of technology; and they are familiar with the strengths and limitations of various technological tools and mediums, and can select and use those best suited for their communication goals.

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<sup>74</sup> Common Core Standards Initiative, *Students Who are College and Career Ready in Reading, Writing, Speaking, Listening, & Language* (2010), available at: <http://www.corestandards.org/ELA-Literacy/introduction/students-who-are-college-and-career-ready-in-reading-writing-speaking-listening-language/>.

## Role of Research

The 2020 ELA Standards build on the tradition of reviewing and utilizing the most current research in education to inform standards revision. The 2010 Minnesota K–12 English language arts standards used the ELA education research and model standards that existed at that time: *the Common Core State Standards for ELA* (CCSS) by the National Governors Association and Council of Chief State School Officers. Since then, the English language arts education community has continued to engage in academic research related to literacy learning and instructional practices. The proposed 2020 Minnesota K–12 English language arts standards incorporate the leading research and developments from the past 10 years. These critical research models and developments, in addition to the research from NAEP reading and ACT, drive the shifts and changes in the revised standards.

The Committee worked to intentionally take in and adapt standards language based on continuous research review. Throughout the review and revision process, MDE considered and provided research to the Committee, while individual committee members and expert reviewers from across the State also brought relevant and current research to the Committee for consideration. Thus, the Committee’s body of crucial research was not isolated to one stage of the process but organically built throughout the review and revision process of the ELA standards review process.

Examples of how the Committee’s body of research influenced and informed the revision of the ELA standards include:

- Foundations of Reading
  - The Science of Reading is a comprehensive body of empirically supported research that provides the information needed to gain a deeper understanding of how students learn to read, the component skills and knowledge and how they work together, and which parts of the brain are responsible for reading development.<sup>75</sup> This research provides an evidence-based best practice approach for teaching foundational literacy skills. This research influenced and informed the Committee’s work on revising the reading standards because it brought to light the importance of including foundational reading skills as standards themselves rather than benchmarks alone to ensure mastery of these critical building blocks is supported through systematic and explicit instruction.
- Reciprocity Between the ELA Strands

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<sup>75</sup> Gough, Philip B. and Turnner, William E., *Decoding, Reading, and Reading Disability*, Remedial and Special Education, 7(1), 6–10 (1986), available at: <https://citeseerx.ist.psu.edu/viewdoc/download?doi=10.1.1.905.7606&rep=rep1&type=pdf> (last visited March 4, 2022); Scarborough, Hollis S., Ph.D., (2002) *Connecting Early Language and Literacy to Later Reading (Dis)abilities: Evidence, Theory, and Practice*, Handbook of Early Literacy Research, Volume 1, Susan B. Neuman and David K. Dickenson, eds., New York: Guildford, p. 97-110 (2002), available at: <https://johnbald.typepad.com/files/handbookearlylit.pdf> (last visited March 4, 2022); Seidenberg, Mark S., *The Science of Reading and Its Educational Implications*, Language Learning and Development, 9:4, 331–360 (2013).



- Research supports that students who learn skills through writing instruction better master aligned skills in reading instruction.<sup>76</sup> This research supported the Committee’s work to align terminology in the benchmarks and strands to make this reciprocity more visible to educators.
- Emphasis on student self-selection, choice, and diverse perspectives
  - Research supports student self-selection, choice, and valuing of perspectives. The committee incorporated this research and the Career and College Readiness Statement in designing standards, prioritizing student self-selection. Self-selection is in the benchmark language in 2010 but not in the anchor standard. Research influenced and informed the Committee’s decision to include student self-selection at the standard level.<sup>77</sup>

Vocabulary is embedded in all three strands. Research supports explicit vocabulary instruction tied to reading, writing, and speaking. This informed the committee’s work to embed vocabulary into each of those strands, which is a shift from the 2010 standards where vocabulary was mostly embedded in the language strand.<sup>78</sup>

- Foundations of Writing include orthography, grammar, and mechanics to express ideas in writing. Research supports mastery of foundational orthography skills to facilitate more fluent writing. Research also supports grammar skills to be embedded in the writing strand and called out as a means to express ideas authentically in writing.<sup>79</sup>
- Writing includes both writing to argue and to persuade, which have similar but slightly different purposes and processes. Research influenced and informed the Committee’s work to align writing standards to national writing assessments to better prepare students for success.<sup>80</sup>
- Listening, Speaking, Viewing, and Exchanging Ideas focuses listening and speaking skills on a genuine exchange of ideas. Research supports including and considering diverse perspectives in discussions. The committee wanted to highlight the importance of the exchange of ideas rather than speaking and

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<sup>76</sup> Graham, Steve & Hebert, Michael, *Writing to Read: A Meta-Analysis of the Impact of Writing and Writing Instruction on Reading*, Harvard Educational Review, pp. 81 & 710–744 (2011), available at: [https://www.researchgate.net/publication/279741659\\_Writing\\_to\\_Read\\_A\\_Meta-Analysis\\_of\\_the\\_Impact\\_of\\_Writing\\_and\\_Writing\\_Instruction\\_on\\_Reading](https://www.researchgate.net/publication/279741659_Writing_to_Read_A_Meta-Analysis_of_the_Impact_of_Writing_and_Writing_Instruction_on_Reading) (last visited March 4, 2022).

<sup>77</sup> RAND Reading Study Group, Catherine Snow (Chair), *Reading for Understanding: Toward and R&D Program in Reading Comprehension*, prepared for Office of Education Research and Improvement – Teachers who give students choices increase motivation to read (2002).

<sup>78</sup> What Works Clearinghouse (WWC): Institute of Education Sciences (IES), *Educator’s Practice Guide: Foundational Skills to Support Reading for Understanding in Kindergarten through 3rd Grade* (2016), available at: [https://ies.ed.gov/ncee/wwc/Docs/PracticeGuide/wwc\\_foundationalreading\\_040717.pdf](https://ies.ed.gov/ncee/wwc/Docs/PracticeGuide/wwc_foundationalreading_040717.pdf) (last visited March 4, 2022), Recommendation 1: Teach Students academic language skills, including the use of inferential and narrative language, and vocabulary usage.

<sup>79</sup> National Assessment Governing Board, *supra* note 8; National Council of Teachers of English (NCTE), *Professional Knowledge for the Teaching of Writing* (2016), available at: <https://www.nagb.gov/content/nagb/assets/documents/publications/frameworks/writing/2017-writing-framework.pdf>; What Works Clearinghouse (WWC): Institute of Educational Sciences (IES), *Educators’ Practice Guide—Teaching Elementary School Students to Be Effective Writers* (2018) (highlights moderate evidence to support teaching students to become fluent in constructing sentences for fluency, meaning, and style), available at: [https://ies.ed.gov/ncee/wwc/Docs/PracticeGuide/WWC\\_Elem\\_Writing\\_PG\\_Dec182018.pdf](https://ies.ed.gov/ncee/wwc/Docs/PracticeGuide/WWC_Elem_Writing_PG_Dec182018.pdf) (last visited March 4, 2022);

<sup>80</sup> National Assessment Governing Board, *supra* note 8.

listening being an isolated practice. The committee brought lived experience in practice to impact this shift, in addition to considering research.<sup>81</sup>

## Public Feedback

To support the development of these proposed rules, the department solicited feedback on the drafts of the ELA academic standards from different sources in the following ways:

- The department invited the public to submit suggestions for revising the standards through an online process that was completed prior to the first meeting of the Committee. The feedback was collected and submitted to the Committee for consideration.
- The public was invited to submit online feedback following the release of the first and second drafts of the revised standards. The public was invited to provide feedback online via MDE’s website, the Superintendent’s mailing, email lists of ELA educators and curriculum directors, and collaborating partner emails and newsletters. The first public feedback period was November 12 through December 6, 2019, and 112 detailed responses were received through the online survey. The second public feedback period was held between February 12 through March 6, 2020, with 303 responses received via the online survey.
- The public was invited to ask questions and submit comments at regional meetings hosted by MDE Director of Academic Standards and Instructional Effectiveness, Doug Paulson, and MDE Literacy Specialists, Leigh Nida and Jennifer Wazlawik. These meetings occurred between November 12th and December 2nd, 2019, across the state of Minnesota. The town halls were held in Bemidji, Alexandria, Marshall, Duluth, Mankato, Rochester, Fergus Falls, and Roseville, Minnesota.
- Information on the proposed standards was presented at additional professional meetings (e.g., Metro Area Curriculum Leaders) across the state, and feedback was provided.

## Expert Reviewer Feedback

Expert input was also sought and considered throughout the process. The department requested feedback on the first draft from two former state content area experts with experience leading and participating in a previous ELA standards revision process. The feedback received directly improved the second draft with attention to foundational reading skills, rigor and text-complexity, and equity in terms of identity and representation.

The department solicited detailed feedback on the second draft of the 2020 Minnesota K–12 English Language Arts Standards from two additional reviewers widely considered to be experts in K–12 standards and ELA education. The themes of feedback from these reviewers indicated high expectations and rigor for students and setting a purpose for speaking and listening. Specific recommendations in their review also helped the committee clarify wording in anchor standards.

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<sup>81</sup> Leong, Lai-Mei & Ahmadi, Seyedeh Masoumeh, *supra* note 12; and Hammond, Zaretta, *Culturally Responsive Teaching and the Brain: Promoting Authentic Engagement and Rigor among Culturally and Linguistically Diverse Students*, Thousand Oaks, CA: Sage Publications (2015).

The expert reviewers include:

- Dr. Lori Helman, Professor and Director of the Minnesota Center for Reading Research, University of Minnesota
- Carol Jago, Associate Director of the California Reading and Literature Project at UCLA, past president of the National Council of Teachers of English, and chair of the College Board English Academic Advisory Committee

Highlighted comments from the expert reviewers include:

Dr. Helman, “I definitely feel the standards are rigorous—as noted in objectives such as critical reading of complex texts, evaluating arguments, examining word choice and its relation to meaning, etc. Especially in the area of writing, I think there are high and rigorous expectations.”

Carlo Jago, “I was particularly fascinated by the idea of a strand titled Exchanging Ideas. This really offers a new perspective on the typical mantra of listening and speaking. I feel your terminology adds importance to these essential language arts by identifying the purpose for having students listen and speak. In a word, it’s brilliant.”

## Equity Review and Feedback

One step in reviewing the standards draft for equity was for the Committee to conduct an equity review. This review was facilitated using elements of the MDE Equity Magnifier tool.<sup>82</sup> The questions within the tool are designed to keep equity as the focal point of discussion when engaging in any action-planning, decision-making, and implementation process. The purpose of the questions is to illuminate blind spots, perspectives that are represented, perspectives that are absent or silenced, and awareness of unintended consequences. The co-chair was familiar with this tool from using it in the field with the Regional Centers of Excellence. This process was utilized to clarify and improve language in the proposed draft.

Feedback was also sought from the MDE Office of Indian Education and in consultation with the Tribal Nations Education Committee (TNEC) to improve language and bring clarity to the statute requirements and inclusivity of Indian Education for All. As a result of this feedback and consultation, the committee recommended a wording change from “the contributions of Minnesota American Indian communities and Tribal Nations” to the terms “Dakota and Anishinaabe people” in Proposed Rule 3501.0660, Subpart 2 (C) and Subpart 4 (A)(1).

The ELA standards review committee reviewed feedback and research in topic-based teams and suggested revisions to the standards in response to that review. The full standards review committee and the writing teams had access to the raw data and a summary of feedback on the second draft to reflect upon while revising for the third draft. The Committee unanimously approved the final draft of the 2010 Minnesota K–12 English language arts standards to be presented to the Commissioner.

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<sup>82</sup> Adapted from: Copyright© 2010 by Corwin. All rights reserved. Reprinted from “Data Strategies to Uncover and Eliminate Hidden Inequities: The Wallpaper Effect” by Ruth S. Johnson and Robin Avelar La Salle. Thousand Oaks, CA, Corwin.

## Approval by the Commissioner of Education and Beginning of Formal Rulemaking Process

The third and final draft was presented to the Commissioner for her approval for rulemaking in September 2020. This draft was posted on the MDE English language arts webpage along with details for rulemaking and the public comment process. The Commissioner approved the proposed 2020 K–12 Academic Standards in English Language Arts and the supporting benchmarks in November of 2020, and the formal rulemaking process began shortly after.

## Organization and Structure of the Proposed Rules

The organization and structure of the standards communicates how ELA education is conceptualized for Minnesota students. The proposed ELA standards include 20 anchor standards that are consistent across Kindergarten through grade 12. The anchor standards are organized into three strands, and each anchor standard fits into a strand:

### Strands

3. Reading—Taking in information from a wide variety of sources through reading, listening, and viewing.
4. Writing—Sharing information with a variety of audiences through writing, speaking, and presenting.
5. Listening, Speaking, Viewing, and Exchanging Ideas—Communicating and collaborating with others through speaking, listening, and viewing.

Each standard has one to four supporting benchmarks that are grade-level specific. The benchmarks are utilized for curriculum development and assessment. The benchmarks are placed at the end of a grade level, where mastery is expected, with the recognition that a progression of learning experiences in earlier grades builds the foundation for mastery later on.

Within the proposed ELA standards are two Foundational Anchor Standards: Reading 1 and Writing 1. Foundational Anchor Standards, although not designated in all grade levels, provide the foundational building blocks needed to prepare and launch successful readers and writers. Foundational Anchor Standards also have between one to four supporting benchmarks for each foundational standard.

## Overview of Changes from the 2010 ELA Standards to the proposed 2020 ELA Standards

Shifts across Strands	Shifts in Reading	Shifts in Writing	Shifts in Listening, Speaking, Viewing, and Exchanging Ideas (LSVEI)
The strands are realigned to reduce overlap and	Foundations of Reading: The reading of decodable text for kindergarten and	Foundations of Writing is a new anchor standard which includes	LSVEI focuses listening and speaking skills on a

Shifts across Strands	Shifts in Reading	Shifts in Writing	Shifts in Listening, Speaking, Viewing, and Exchanging Ideas (LSVEI)
<p>connect ideas to improve ease of use for teachers.</p>	<p>grade 1 is called out to reinforce the phonics lesson.</p> <p>Additional phonemic awareness skills are extended in grade 2 and include advanced phonemic awareness in grade 3.</p> <p>Skills related to morphology are extended into higher grades.</p> <p>There is also greater emphasis on the importance of both reading accuracy and automaticity, and reading words both in and out of context.</p>	<p>orthography, grammar, and mechanics to express ideas in writing.</p>	<p>genuine exchange of ideas.</p>
<p>Grammar skills are embedded in the Writing strand and called out as a means to express ideas authentically in writing.</p>	<p>New and expanded definition of text (see front matter and glossary).</p>	<p>Writing 4 includes writing both to argue and to persuade, which have similar but slightly different purposes and processes.</p>	<p>LSVEI 1 focuses on listening before speaking as well as including and considering diverse perspectives in discussions.</p>
<p>Vocabulary is embedded in all three strands.</p>	<p>In most anchor standards, literary and informational text benchmarks are not separated.</p>	<p>Writing 2 incorporates student personal perspective, identity, and voice across writing purposes and disciplines.</p>	<p>LSVEI 2 encompasses the spoken language skills previously in the 2010 Language strand and emphasizes attending to audience and context.</p>

Shifts across Strands	Shifts in Reading	Shifts in Writing	Shifts in Listening, Speaking, Viewing, and Exchanging Ideas (LSVEI)
<p>There is a media literacy standard in each strand, allowing media literacy to relate authentically to Reading 9 (gathering and assessing credibility and relevance of sources), Writing 8 (using and citing evidence from sources), and LSVEI 3 (accessing, analyzing, and creating digital content safely).</p>	<p>Emphasis on student self-selection, choice, and diverse perspectives.</p>		
<p>The contributions of Minnesota American Indians and Tribes are clarified to recognize Dakota and Anishinaabe authors and voices and to expand representation of student identity in writing.</p>	<p>Specific texts are not required.</p>		
<p>Benchmarks in grades 9 and 10 are separated, and grades 11–12 remain grade banded.</p>	<p>Evaluating arguments from complex informational texts to begin in grade 3.</p>		

## Statutory Authority

MDE has statutory authority to adopt rules for English language arts academic standards under [Minnesota Statutes, section 120B.02, subdivision 1 \[2021\]](#); [Minnesota Statutes, section 120B.021, subdivision 1\(a\)\(1\) \[2021\]](#). Under these statutes, MDE has the necessary statutory authority to adopt the proposed 2020 rules.

## Regulatory Analysis

[Minnesota Statutes, section 14.131 \[2021\]](#), identifies eight factors for a regulatory analysis that must be included in the SONAR of the proposed rules. Paragraphs (1) through (8) below quote these factors and then give the agency's response.

**A. Description of the classes of persons who probably will be affected by the proposed rule, including classes that will bear the costs of the proposed rule and classes that will benefit from the proposed rule.**

The following classes of persons are affected by the proposed rules: Minnesota parents and students; Minnesota school districts, including charter schools; English language arts (ELA) educators and teachers implementing the ELA academic standards in their discipline; and ELA curriculum specialists and directors. The department does not believe that there will be significant costs to these classes of persons associated with the proposed rules, as discussed in this SONAR; however, minimal costs related to implementation are likely to be borne by the department and by local education agencies (LEAs), including Minnesota school districts and charter schools. Individual persons, such as educators, teachers, parents, and students, will not incur any costs from the proposed 2019 rules. Minimal costs borne by the LEA are described further in question #5 of this regulatory analysis. The classes that will benefit from the proposed rules include Minnesota students who will achieve greater levels of ELA literacy and competency, preparing them for career and college opportunities in Minnesota's economy as well as success in all industries with a mastery of language, writing, reading, speaking and related technical skills.

**B. The probable costs to the agency and to any other agency of the implementation and enforcement of the proposed rule and any anticipated effect on state revenues.**

The proposed rules will create planned costs for the department during implementation of the 2020 proposed rules. The department is already staffed to provide training and support regarding the ELA content area and to develop and implement federally mandated ELA assessments to be described in question #5 of this regulatory analysis. Staff assignments and resources will be reallocated accordingly within the agency as necessary to support districts with technical assistance and implementation of the new standards. There will be no anticipated effect on revenue. The proposed rules will create, at most, already anticipated costs for the department.

There are other state agencies that may be impacted by these rules. The Professional Educators Licensing State Board (PELSB) will need to realign their ELA licensure rules to the content standards for implementation and enforcement. The fiscal impact to these other state agencies will not be more than already anticipated.

**C. A determination of whether there are less costly methods or less intrusive methods for achieving the purpose of the proposed rule.**

Given that establishing state academic standards in the area of ELA is a legislative requirement, there is no less costly or less intrusive method for achieving the purpose of the proposed rules. Because the proposed ELA standards are a revision of the 2010 standards grounded in Common Core and based on the same foundational research used by most other states, the department will likely be able to improve future cost savings for districts

as access to classroom resources, curriculum materials, assessments, and professional development tools that have been developed across the country are adapted for Minnesota-specific use.

**D. A description of any alternative methods for achieving the purpose of the proposed rule that were seriously considered by the Agency and the reasons why they were rejected in favor of the proposed rule.**

Because adopting rules containing state academic standards in ELA is a legislative requirement, there is no alternative method for satisfying this requirement or achieving the purpose of the proposed rules.

**E. The probable costs of complying with the proposed rule, including the portion of the total costs that will be borne by identifiable categories of affected parties, such as separate classes of governmental units, businesses, or individuals.**

Local education agencies (LEAs) may face initial increased costs to implement the new rules. However, LEAs typically anticipate and undertake a regular curriculum adoption cycle, so many of these costs would be borne regardless of the adoption into rule of the proposed 2020 ELA standards. The department has generally allowed for a five-year implementation timeline, and the costs for adjusting curriculum will be spread out over the five years, beginning with the inception of the formal rulemaking process in 2020 and ending with implementation of the proposed 2020 rules in the 2025–26 school year.

MDE will have costs associated with developing a new version of statewide assessments (MCA) to assess the new standards. These costs are already budgeted in the contract with the vendor.

- Test Specifications MCA Reading ~\$25,000
- Test Specifications MCA-Alternate Reading ~\$25,000
- Alignment Studies MCA Reading ~\$250,000
- Alignment Studies MCA-Alternate Reading ~\$250,000
- Standard Setting MCA Reading ~\$325,000
- Standard Setting MCA-Alternate Reading ~\$325,000

**F. The probable costs or consequences of not adopting the proposed rule, including those costs or consequences borne by identifiable categories of affected parties, such as separate classes of government units, businesses, or individuals.**

The primary costs and consequences of not adopting the proposed rules are the potential impact on students, families, and the business community. The existing 2010 ELA standards lack the depth and clarity of the proposed 2020 standards reflective of current cognitive and content research specifically in regards to the Science of Reading, so all students will receive a less rigorous, complete, and competitive ELA education if the proposed 2020 rules are not adopted. Students will benefit from the proposed 2020 rules by achieving greater levels of mastery in Reading, Writing, Speaking, and Media Literacy, skills that are crucial for success in any profession and necessary for meaningful citizenship. This increased literacy will benefit the broader community and economy by having a stronger workforce and consumers that are better able to communicate effectively in the modern age.

**G. An assessment of any differences between the proposed rule and existing federal regulations and a specific analysis of the need for and reasonableness of each difference.**



There is not a significant difference between the proposed 2020 rules and existing federal regulations that govern state academic standards. The Minnesota Legislature’s decision to require statewide academic standards in ELA is permissible and consistent with current and applicable federal laws. The new *Every Student Succeeds Act* (ESSA),<sup>83</sup> which reauthorized the Elementary and Secondary Education Act (ESEA) of 1964, requires that all students in the United States be taught to high academic standards that prepare them for success in career and college. As a part of the state plan that Minnesota submitted for the ESSA, the state provided an assurance that the state has adopted or has a process for adopting academic standards required under the federal law for mathematics, reading or language arts, and science as well as standards for other subjects determined by the state, including physical education, social studies, and the arts.<sup>84</sup> Minnesota has academic standards in these content areas, including ELA, which satisfies both state and federal requirements.

The reauthorized ESSA builds upon the previous version of the ESEA, known as the *No Child Left Behind Act* (NCLB). The previous definition of core academic subjects in NCLB included reading and language arts. The amended ESSA law expanded “core academic subjects” to “well-rounded education,” meaning “courses, activities and programming in subjects such as English, reading or language arts, writing, science, technology, engineering, mathematics, foreign languages, civics and government, economics, arts, history, geography, computer science, music, career and technical education, health, physical education and any other subject, as determined by the State or local educational agency, with the purpose of providing all students access to an enriched curriculum and educational experience.”<sup>85</sup> Thus, the proposed rules comply with existing federal law and state law requiring state academic standards in specific content areas, including English, reading or language arts, and writing.

**H. An assessment of the cumulative effect of the rule with other federal and state regulations related to the specific purpose of the rule.**

The department is proposing these rule amendments to improve and to provide clarity and consistency in ELA education, for both teachers and students. The proposed amendments update the existing rules governing the K–12 academic standards in ELA that have been in effect for the last 10 years based on the last decade of academic research and best practices in this content area and high-quality academic standards as a whole. The proposed rule amendments are intended to align with state laws that govern academic standards and with the new federal legislation, ESSA, which requires states to submit a state plan that provides assurances that the state has adopted challenging academic standards aligned with academic achievement (see question seven above). The proposed standards do not establish overlapping or additional requirements; rather, they comply with existing requirements related to academic standards that are permitted (and required) by federal and state law. The cumulative effect of the proposed standards in combination with state statutes and the new federal regulation under ESSA is a higher quality education in ELA for all Minnesota students with better outcomes related to career and college readiness and success and meaningful citizenship. The department believes the proposed rules governing ELA standards and the supporting benchmarks will benefit all Minnesota families,

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<sup>83</sup> [Every Student Succeeds Act \(ESSA\) of 2015, Pub. L. No. 114-95, § 114 Stat. 1177 \(2015-2016\)](#).

<sup>84</sup> [See The Minnesota Department of Education Minnesota State Plan webpage.](#)

<sup>85</sup> [Every Child Succeeds Act \(ESSA\) of 2015, Pub. L. No. 114-95 §114 Stat. 1177, Title VIII, § 8002, paragraph 52 \(2015-2016\)](#).

students, educators, and school communities in their understanding and implementation of the updated K–12 academic standards in ELA.

## Performance-Based Rules

The SONAR must also describe how the agency, in developing the rules, considered and implemented the legislative policy supporting performance-based regulatory systems set forth in [Minnesota Statutes section 14.002 \[2021\]](#). This statute requires state agencies, whenever feasible, to develop rules and regulatory programs that emphasize superior achievement in meeting the agency’s regulatory objectives and maximum flexibility for the regulated party and the agency in meeting those goals.

Throughout the development of the proposed rules and this SONAR, the department made every attempt to develop rules that will be understandable to and workable for education practitioners and families, ensuring efficient and effective delivery of services while achieving the best possible education results for students. The department believes the proposed rules clarify and improve the ELA standards, helping Minnesota educators provide a higher quality ELA education and promoting positive education outcomes for all students. The proposed rules and supporting benchmarks help Minnesota teachers, curriculum developers, and other district staff craft high-quality ELA education and help ensure Minnesota students are receiving a robust ELA education that will lead to career and college readiness and success and an overall increase in literacy. The department believes the proposed rules are performance-based to the extent possible because the proposed rules extend duties and burdens no further than is necessary to meet the state’s academic standard requirements in the content area of ELA. Flexibility still remains as districts can create and modify their own high-quality and rigorous curriculum that aligns with state standards in this content area.

## Additional Notice Plan

In addition to mailing the proposed rules and the appropriate notice to all persons who have registered to be on the department’s paper and email rulemaking mailing lists under Minnesota Statutes, section 14.14, subd. 1a, MDE intends to send an electronic notice with a hyperlink to electronic copies of the Dual Notice, SONAR, and the proposed rule amendments to the following list of interested and impacted parties:

### General Education-Related Organizations/Entities

- African American Leadership Forum (AALF);
- Association of Metropolitan School Districts (AMSD);
- Board of Indian Education (BIE) Schools;
- Board of School Administrators (BOSA);
- Bridges Workplace Connection;
- Charter School Partners;
- Career and Technical Education (CTE) professional groups;
- Early Childhood/Community Education groups;
- Education Minnesota;
- Equal Employment Opportunity Commission (EEOC);
- Generation Next;

- Integration Districts, including East Metro Integration and N.W. Suburban Integration District;
- Information Technology Educators of Minnesota;
- Intermediate School Districts;
- Learning Disabilities Association (LDA);
- Mentoring Partnership of Minnesota (MPM);
- Metropolitan Library Service Agency (MELSA);
- EdAllies;
- Minneapolis Urban League;
- Minnesota Administrators for Special Education (MASE);
- Minnesota Association for Supervision and Curriculum Development (MASCD);
- Minnesota Association of Alternative Programs;
- Minnesota Association for the Education of Young Children (MnAEYC);
- Minnesota Association of Charter Schools (MACS);
- Minnesota Association of Colleges for Teacher Education (MACTE);
- Minnesota Association of School Administrators (MASA);
- Minnesota Association of Secondary School Principals (MASSP);
- Minnesota Association of Special Educators (MASE);
- Minnesota Business Partnerships (MBP);
- Minnesota Career College Association (MCCA);
- Minnesota Chamber of Commerce;
- Minnesota Citizens League;
- Minnesota Council on Foundations;
- Minnesota Department of Employment and Economic Development (DEED);
- Minnesota Developmental Adaptive Physical Education (MNDAPE);
- Minnesota Elementary School Principal’s Association (MESPA);
- Minnesota Independent School Forum (MISF);
- Minnesota Kindergarten Association;
- Minnesota Office of Higher Education (OHE);
- Minnesota Parent Teacher Student Association (MNPTA);
- Minnesota Private College Council (MPCC);
- Minnesota Professional Educator Licensing and Standards Board (PELSB);
- Minnesota Rural Education Association (MREA);
- Minnesota School Boards Association (MSBA);
- Minnesota School Counselors Association;
- Minnesota State Colleges and Universities (Minnesota State);
- Minnesota State High School League (MSHSL);
- Minnesota Tribal Nations Education Committee (TNEC);
- National Association for the Advancement of Colored People (NAACP) – St. Cloud, St. Paul, and Minneapolis branches;
- PACER Center;
- Parents United;
- Schools for Equity in Education (SEE);
- Service Cooperatives/Regional Service Cooperatives;
- University of Minnesota/University of Minnesota College of Education and Human Development;
- Other relevant education organizations or parent and student advocacy groups;
- English language arts standards review committee members; and

- Posting on MDE’s English language arts academic standards webpage and English language arts academic standards rulemaking webpage.

## **English Language Arts and Literacy Related Education Organizations and Entities**

- Rochester Reading Center;
- International Dyslexia Association – Upper Midwest Branch;
- Decoding Dyslexia of MN;
- Dyslexia Advocates (based in Burnsville);
- Orton Gillingham of MN;
- Orton Gillingham Reading Specialists;
- MN Reading Corps;
- Metro Area Curriculum Leaders (MACL);
- Regional Centers of Excellence (RCEs);
- Minnesota Council of Teachers of English (MCTE);
- Minnesota Writing Project;
- Minnesota Reading Association (MRA);
- Minnesota Kindergarten Association; and
- Information and Technology Educators of Minnesota (ITEM).

## **MDE Listservs**

- MDE Superintendents listserv;
- MDE Minnesota Special Education Directors listserv;
- MDE Charter School Directors and Non-Public listserv;
- MDE Achievement and Integration listserv;
- MDE General Rulemaking listserv;
- MDE English Language Arts Specific Rulemaking listserv; and
- MDE Curriculum Directors listserv.

Under Minnesota Statutes, section 14.14, subdivision 1a, MDE believes its regular means of notice, including publication in the State Register, and will adequately provide notice of this rulemaking to persons interested in or regulated by these rules.

## **Consult with MMB on local government impact**

As required by Minnesota Statutes, section 14.131, the department consulted with Minnesota Management and Budget (MMB). The department sent MMB copies of the documents that were sent to the governor’s office for review and approval on the same day the documents were sent to the governor’s office. This was done prior to the department’s publishing of the Dual Notice of Intent to Adopt. The documents sent to MMB included the governor’s office Proposed Rule and SONAR Form, the proposed rules, and the SONAR. The department will submit a copy of the cover correspondence and the response received from MMB to OAH at the hearing or with the documents it submits for ALJ review.

## Impact on local government ordinances and rules

As required by Minnesota Statutes, section 14.128, subdivision 1, the agency has considered whether these proposed rules will require a local government to adopt or amend any ordinance or other regulation in order to comply with these rules. The agency has determined that they do not because the proposed rules do not affect any of the local governments included in the scope of Minnesota Statutes, section 14.128.

## Costs of complying for small business or city

As required by Minnesota Statutes, section 14.127, the department has considered whether the cost of complying with the proposed rules in the first year after the rules take effect will exceed \$25,000 for any small business or small city. The department has determined that the cost of complying with the proposed rules in the first year after the rules take effect will not exceed \$25,000 for any small business or small city. This determination was made because the proposed rules do not affect small businesses and small cities.

## List of Witnesses

If these rules go to a public hearing, the department anticipates having the following witnesses testify in support of the need for and reasonableness of the rules:

1. Leigh Nida, ELA Specialist and Interim Supervisor of Academic Standards and Instructional Effectiveness, Minnesota Department of Education Division of Academic Standards, Instruction, and Assessment. Ms. Nida will testify about the history of academic standards in Minnesota, the history of ELA standards in Minnesota, the role of academic standards in Minnesota's education community, the ELA standards review committee formation process, the rule review and revision process, and how the national standards impact MDE's process.
2. Eric Taubel, MDE General Counsel, will introduce the rulemaking exhibits into the record.

## SONAR Exhibits (if applicable)

In support of the need for and reasonableness of the proposed rules, the department anticipates that it will enter the following exhibits into the hearing record:

1. 2020 K–12 Academic Standards in ELA SONAR;
2. Revisor-Approved Proposed Rule Language; and
3. MDE K–12 Academic Standards in ELA guidance document.

## Rule by Rule Analysis

This section builds on the previous sections in the SONAR and specifically addresses the proposed rule language of the 2020 Minnesota English Language Arts (ELA) Standards. The section describes why the standards are necessary and reasonable. The proposed ELA Standards are:

## Proposed Permanent Rules Relating to K–12 Academic Standards in English Language Arts

### 3501.0660 ACADEMIC STANDARDS FOR KINDERGARTEN THROUGH GRADE 12.

Subpart 1. **Purpose and application.** The purpose of these standards is to establish statewide standards for English Language Arts that govern instruction of students in kindergarten through grade 12. School districts shall assess a student’s performance using criteria in subparts 2 to 4.

#### Subp. 2. **Reading.**

A. The student will demonstrate knowledge of oral language, phonological and phonemic awareness, phonics, and morphology to read accurately and fluently.

B. The student will read and comprehend independently both self-selected and teacher-directed texts; complex literary and informational texts; and texts from multiple sources representing perspectives and identities like and unlike their own from dominant, nondominant, and marginalized groups.

C. The student will independently read and comprehend both self-selected and teacher-directed complex literary and informational texts representing perspectives of historical and contemporary Dakota and Anishinaabe people.

D. The student will read critically to comprehend, interpret, and analyze themes and central ideas in complex literary and informational texts.

E. The student will apply knowledge of text structure to understand and evaluate a wide variety of complex literary and informational texts.

F. The student will analyze influences on content, meaning, and style of text, including fact and fiction, time period, and author perspective and identity, including Dakota and Anishinaabe perspective, in complex literary and informational texts.

G. The student will evaluate arguments and specific claims from complex informational texts.

H. The student will examine the impact of vocabulary, including words and phrases, on content, style, and meaning of complex literary and informational texts.

I. The student will access and gather information from a variety of sources representing diverse perspectives and assessing relevancy and credibility of information.

#### Subp. 3. **Writing.**

A. The student will demonstrate knowledge of oral language, orthography, grammar, and mechanics to express ideas in writing.

B. The student will write routinely for various purposes and disciplines, representing one’s own personal perspective, identity, and voice.

C. The student will develop and strengthen writing by using a writing process, including planning, drafting, revising, editing, and publishing.

D. The student will write arguments to support claims and to persuade in an analysis of topics or texts, using valid reasoning and evidence while considering the audience.

E. The student will write informative or explanatory texts to examine and convey complex ideas and information clearly and accurately through use of informational and literary text, while considering the audience.

F. The student will write narratives, poetry, and other creative texts with details and effective technique to express ideas.

G. The student will engage in inquiry-based learning and research processes to create texts and presentations for a variety of purposes and audiences.

H. The student will support writing with evidence from sources, correctly cite those sources, and demonstrate an understanding of the rights and obligations of using intellectual property.

**Subp. 4. Speaking, listening, viewing, and exchanging ideas.**

A. The student will exchange ideas in discussion and collaboration as a listener, speaker, and participant by:

(1) including the voices and perspectives of Dakota and Anishinaabe people as well as other perspectives, identities, and cultures like and unlike their own; and

(2) expressing one's own ideas, stories, and experiences.

B. The student will communicate with others by applying knowledge of vocabulary, language, structure, and features of spoken language, while considering the audience and context.

C. The student will thoughtfully and safely access, analyze, and create written, oral, and digital content applicable to task, purpose, audience, and discipline.

**REPEALER.** Minnesota Rules, parts 3501.0640; 3501.0645; 3501.0650; and 3501.0655, are repealed.

**EFFECTIVE DATE.** These standards are effective at the beginning of the 2024–2025 school year.

These rules are necessary and reasonable because they utilize current research and understanding in the field of ELA. These proposed rules also respond to public feedback and input from Minnesotans, and they meet the statutory requirements and establish a timeline for the implementation of the standards. Each subpart of the proposed rules and its need and reasonableness will be discussed in more detail below in the Analysis of Rule by Subparts Section.

## Overview of Improvements from the 2010 ELA standards

As mentioned in previous sections of the SONAR, the proposed 2020 ELA standards shift from the 2010 standards in several ways that improve the standards, such as improving reciprocity between the strands and embedding vocabulary and media literacy into standards in every strand.

The reciprocity between strands reduces overlap and connects ideas in order to improve the ease of use for teachers. Examples of this include embedding grammar skills in the writing strand to create more coherence between language and writing as well as embedding vocabulary across all three strands to utilize knowledge in the context of learning.

The standards also build upon the research of the Science of Reading to embed foundations of reading throughout the K–12 experience. Having additional phonemic awareness skills extended into upper grade levels and extending morphology into the progression allows students to have a more extended learning progression that is in line with research.

## Analysis of Rule by Subparts

This section describes the necessity and reasonableness of the proposed rules, in detail. The section illustrates the importance of the rules in setting learning goals for Minnesota students in ELA. It also shows how the rules incorporate research and provide continuity from the 2010 ELA standards, with shifts in some areas. This section further shows how the standards review and revision process incorporated stakeholder and expert feedback.

The proposed rules are the academic standards in ELA. By statute, an “Academic Standard” is a “summary description of student learning in a required content area under 120B.021 or elective content area under 120B.022.”<sup>86</sup> A “Benchmark” is defined by statute as a “specific knowledge or skill that a student must master to complete part of an academic standard by the end of a grade level or grade band.”<sup>87</sup> So, while the standards describe what students must learn in school by grade 12, the supporting benchmarks describe the specific student learning outcomes for each grade level or grade band. The standards review and revision process includes review and revision of the supporting benchmarks, which are the way the standards (the rules) are carried out at specific grade levels. The review and revision of the supporting benchmarks is necessary so that schools can offer and students can achieve all the supporting benchmarks to satisfactorily complete each of the state standards in a particular content area.

The proposed rules are organized as 20 anchor standards that apply to student learning in grades K–12. These standards are described as anchor standards because they consistently anchor student learning in grades K–12 in these key areas. The anchor standards are organized into the following strands (subparts).

Subpart 1: Purpose and application

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<sup>86</sup> [Minn. Stat. § 120B.018, Subd. 2 \[2021\]](#).

<sup>87</sup> [Minn. Stat. § 120B.018, Subd. 3 \[2021\]](#).



Subpart 2: Reading

Subpart 3: Writing

Subpart 4: Speaking, listening, viewing and exchanging ideas

The organization of the proposed rules into 3 strands (subparts 2–4) represents a shift from the 2010 ELA standards. The 2010 ELA standards had strands of Reading, Writing, Language and Speaking, Viewing Listening and Media Literacy, and Language, each as a separate rule. In the proposed rules, the standards review committee considered research and public and expert feedback and decided to consolidate the standards previously in the Language strand into the three new strands. The research and feedback supported this decision in showing that best practice includes grammar instruction applied to authentic reading, writing, and communicative tasks. This chart provides an overview of the changes in organization from the 2010 to 2020 ELA Standards.

Aspect of Organization	2010 ELA Standards	2020 ELA Standards
Strands (subparts) – an organizational grouping of standards	1. Reading 2. Writing 3. Speaking, Viewing, Listening, and Media Literacy 4. Language	1. Reading 2. Writing 3. Listening, Speaking, Viewing, and Exchanging Ideas
Standards (rule) – a summary description of student learning	Ten anchor standards in Reading, with separate supporting benchmarks for literature and informational texts. Ten anchor standards in Writing. Eight anchor standards in Speaking, Viewing, Listening, and Media Literacy. Six anchor standards in Language. The anchor standards for Language are also embedded in the other strands. Total = 34 anchor standards	Nine anchor standards in Reading, with supporting benchmarks applied to both literary and informational text, except where specified. Eight anchor standards in Writing. Three anchor standards in Listening, Speaking, Viewing, and Exchanging Ideas. Total = 20 anchor standards

Aspect of Organization	2010 ELA Standards	2020 ELA Standards
<p>Benchmarks – specific knowledge or skill that a student must master to complete part of an academic standard by the end of the grade level or grade band. Supports academic standards rules.</p>	<p>Learning objectives that further define the standards.</p> <p>Grade specific for K–8 and grade banded for 9–10 and 11–12.</p> <p>Supporting benchmarks for reading literature and information text are separate.</p> <p>Literacy in History/Social Studies, Science, and Technical Subjects supporting benchmarks for grades 6–12 is a separate section.</p>	<p>Learning objectives that further define the standards, with one learning concept and/or skill per benchmark.</p> <p>Grade specific for K–10 and grade banded for 11–12.</p> <p>Supporting benchmarks incorporate reading of literature and informational text, except where labeled otherwise.</p> <p>Supporting benchmarks demonstrate integration of key literacy skills in Science, Social Studies, Technology and Information Literacy, and Computer Science.</p>

## Analysis of Rules in Subpart 2: Reading

### A. The student will demonstrate knowledge of oral language, phonological and phonemic awareness, phonics, and morphology to read accurately and fluently.

This proposed standard is needed and reasonable because it demonstrates the research and current understanding in the field that students need to have a strong base of foundational reading skills in order to become skilled readers. This was not an anchor standard in the 2010 ELA standards, but those standards did include supporting benchmarks in grades K–5 on foundational reading skills. The committee elevated foundation skills to the anchor standard level based on research that shows that students cannot achieve reading comprehension without basic decoding and word recognition skills.<sup>88</sup>

### B. The student will read and comprehend independently both self-selected and teacher-directed texts; complex literary and informational texts; and texts from multiple sources representing perspectives and identities like and unlike their own from dominant, non-dominant, and marginalized social groups.

This proposed 2020 standard is a revision of a more general rule in the 2010 ELA Standards, Reading, subpart 4: “The student will read and comprehend complex literary and informational text independently and proficiently.”

<sup>88</sup> Gough, Philip B. & Tunmer, William E.; Scarborough, Hollis S.; & Seidenberg, Mark S., *supra* note 75.

The proposed standard is needed and reasonable because it demonstrates an understanding from current research that students need to have a choice in their reading materials in order to feel engaged with reading and that students benefit from reading from multiple perspectives.<sup>89</sup> This standard generated much public feedback, primarily centering on teacher concerns for finding texts for the students to meet the standard. Additional guidance on how to select sources will be included in implementation supports for the 2020 ELA standards but is beyond the scope of this SONAR document.

**C. The student will independently read and comprehend both self-selected and teacher-directed complex literary and informational texts representing perspectives of historical and contemporary Dakota and Anishinaabe people.**

This proposed 2020 standard evolved as a specific elaboration of Reading Standard B (see above), both to meet the statutory requirement of Minnesota Statutes section 120B.021, subd. 4(a), and to ensure that all Minnesota students are exposed to reading texts from authentic perspectives of historical and contemporary Dakota and Anishinaabe people. The 2010 ELA standards included Minnesota American Indian authors at the benchmark level. The proposed language is needed and reasonable because consultation with the Tribal National Education Committee highlighted the benefit of raising the attention regarding the contributions of the Minnesota American Indian tribes and communities to the standard level to ensure that students at every grade level will be exposed to the perspectives of their state’s American Indian people. The changed wording to call out Dakota and Anishinaabe people, rather than Minnesota American Indian people, is both to be more specific and to help teachers and students recognize and engage with text written by an author who is a citizen of one of Minnesota’s tribes.

**D. The student will read critically to comprehend, interpret, and analyze themes and central ideas in complex literary and informational text.**

This proposed 2020 standard represents another shift in organization from the existing standards. This language is needed and reasonable because it consolidates several 2010 standards to reduce redundancies and provide improved clarity for teachers. There are four supporting benchmarks under this standard that include learning progressions from Kindergarten to grade 12 related to comprehension of the text itself and drawing inferences from text, identifying to analyzing themes and central ideas in text, identifying to analyzing literary elements in literary text, and identifying to interpreting and analyzing key elements of informational text. The proposed standard will help students learn that all texts have themes and central ideas and that understanding what the text says explicitly and inferentially is important to reading comprehension.

**E. The student will apply knowledge of text structure to understand and evaluate a wide variety of complex literary and informational texts.**

This proposed 2020 standard represents another shift in organization from the existing standards. This language is needed and reasonable because it consolidates several 2010 standards to reduce redundancies and provide improved clarity for teachers. There are three supporting benchmarks under this standard so that there are learning progressions from Kindergarten to grade 12 related to comprehension based on literary text structure,

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<sup>89</sup> RAND Reading Study Group, *supra* note 77.

informational text structure, and the impact of illustrations, graphics, and other audiovisual elements on text. The proposed standard will help students learn that in all texts, the structure as well as illustrations, graphics, and other audiovisual aspects are important to reading comprehension.

**F. The student will analyze influences on content, meaning, and style of text, including fact and opinion, time period, and author perspective and identity, including Dakota and Anishinaabe perspective, in complex literary and informational texts.**

This proposed 2020 standard is needed and reasonable because it expands a 2010 standard to incorporate media literacy skills. These skills are crucial because they support students in learning how to critically analyze a wide variety of influences on content, meaning, and style of a text. The Dakota and Anishinaabe perspectives are called out in this standard, again, to ensure that students at every grade level will be exposed to the perspectives of their state’s American Indian people.

**G. The student will evaluate arguments and specific claims from complex informational text.**

This proposed 2020 standard is needed and reasonable because students must be able to evaluate arguments and claims in order to be career, college, and civic reading individuals who are critical consumers of information. This standard changed little from the similar 2010 ELA standard. As with all of the standards in which the standard language is relatively similar, it will be important for teachers to consider the supporting benchmark language at each grade level to discover turns in emphasis. Additional guidance on evidence-based instructional practices to support teaching the content in the supporting benchmarks will be included in implementation supports for the 2020 ELA standards but is beyond the scope of this standards document.

**H. The student will examine the impact of vocabulary, including words and phrases, on content, style, and meaning of complex literary and informational texts.**

This proposed 2020 standard represents a consolidation of several 2010 standards from the Language strand. This standard is needed and reasonable because it aligns with current research that supports explicit instruction on vocabulary and academic language across the content areas. In order to support this explicit instruction, the proposed 2020 standards incorporate vocabulary into each of the strands to show its particular connection to reading (in this proposed standard), writing (in subpart 3), and exchanging ideas (in subpart 4). Vocabulary connects to reading in that students need to understand meaning and impact of use of words and phrases in order to comprehend what they read.<sup>90</sup>

**I. The student will access and gather information from a variety of sources representing diverse perspectives and assessing relevancy and credibility of information.**

This proposed 2020 standard represents a consolidation of 2010 ELA standards in the Reading strand and in the Speaking, Viewing, Listening, and Media Literacy strand. This combined standard is needed and reasonable

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<sup>90</sup> What Works Clearinghouse (WCC): Institute of Educational Sciences (IES), *Educators’ Practice Guide - Teaching Elementary School Students to Be Effective Writers* (2018) (highlights moderate evidence to support teaching students to become fluent in constructing sentences for fluency, meaning, and style), available at: [https://ies.ed.gov/ncee/wwc/Docs/PracticeGuide/WWC\\_Elem\\_Writing\\_PG\\_Dec182018.pdf](https://ies.ed.gov/ncee/wwc/Docs/PracticeGuide/WWC_Elem_Writing_PG_Dec182018.pdf) (last visited March 4, 2022)

because it incorporates media literacy, with alignment to the Information and Technology Educators of Minnesota (ITEM) 2019 standards. Incorporating this alignment into each of the strands to show its particular connection to reading (in this proposed standard), writing (in subpart 3), and exchanging ideas (in subpart 4) is important to ensure students develop media literacy skills. Media literacy connects to reading in that readers need to know how to access and gather information from a variety of sources, to ensure that the sources represent diverse perspectives, and to ensure that the sources present credible information that is relevant to the reader’s task.

### **Analysis of Rules in Subpart 3: Writing**

**A. The student will demonstrate knowledge of oral language, orthography, grammar, and mechanics to express ideas in writing.**

This proposed 2020 standard is needed and reasonable because it demonstrates the research and current understanding in the field that students need to have a strong base of foundational writing skills in order to become skilled writers. This standard represents a consolidation of several 2010 standards from the Language strand. The consolidated 2010 Language standards include “Demonstrate command of the conventions of standard English grammar and usage when writing and speaking” and “Demonstrate command of the conventions of standard English capitalization, punctuation, and spelling when writing.” The consolidation of these standards is needed and reasonable due supporting research and public feedback considered by the Committee that encouraged the integration of grammar instruction into authentic writing experiences.<sup>91</sup>

**B. The student will write routinely for various purposes and disciplines, representing one's own personal perspective, identity, and voice.**

This proposed 2020 standard is needed and reasonable as an expansion of a 2010 standard, following research that has emerged since 2010. This expanded standard is reasonable because the new research supports adding emphasis on personal perspective, identity, and voice to increase student engagement with writing.<sup>92</sup> This proposed standard aligns well with the standard in the reading strand that requires students to analyze the role that perspective and identity have on text (subpart 2, F).

**C. The student will develop and strengthen writing by using a writing process, including planning, drafting, revising, editing, and publishing.**

This proposed 2020 standard changed little from the similar 2010 ELA standard. As with all standards in which the standard language is relatively similar, it will be important for teachers to consider the benchmark language at each grade level to discover turns in emphasis.

**D. The student will write arguments to support claims and to persuade in an analysis of topics or texts, using valid reasoning and evidence while considering the audience.**

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<sup>91</sup> National Assessment Governing Board, *supra* note 8; National Council of Teachers of English (NCTE), *supra* note 79; and What Works Clearinghouse, *supra* note 78 (Recommendation 1: Teach Students academic language skills, including the use of inferential and narrative language, and vocabulary usage).

<sup>92</sup> National Assessment Governing Board, *supra* note 8; National Council of Teachers of English (NCTE), *supra* note 79.

This proposed 2020 standard is needed and reasonable as an expansion of a 2010 standard, adding the skill of writing to persuade, following research that supports setting clear purposes for writing. The National Assessment of Educational Progress (NAEP) assesses student skill in writing to persuade. The 2010 ELA standard on argument did not include persuasive writing. Broad purposes for each genre of writing are included in the introduction of the 2020 standards document to help teachers.

**E. The student will write informative or explanatory texts to examine and convey complex ideas and information clearly and accurately through use of informational and literary text, while considering the audience.**

This proposed 2020 standard is needed and reasonable because students must be able to write to inform or explain facts and ideas in order to be career, college, and civic reading individuals who can communicate ideas clearly and accurately. This standard changed little from the similar 2010 ELA standard.

**F. The student will write narratives, poetry, and other creative texts with details and effective technique to express ideas.**

This proposed 2020 standard is needed and reasonable because creative writing is a key aspect of personal communication. Creative writing also aligns well with comprehension and analysis of literary work (subpart 2, D). This standard changed little from the similar 2010 ELA standard.

**G. The student will engage in inquiry-based learning and research processes to create texts and presentations for a variety of purposes and audiences.**

This proposed 2020 standard represents a shift in emphasis from research projects (2010 standards) to inquiry-based learning and research process (proposed standard). The proposed standard is needed and reasonable because it demonstrates an understanding from current research that supports engaging students in active learning, inquiry, application, production, and problem solving. Research shows that critical thinking skills develop through inquiry based learning.<sup>93</sup>

**H. The student will support writing with evidence from sources, correctly cite those sources, and demonstrate an understanding of the rights and obligations of using intellectual property.**

This proposed 2020 standard is one of three media literacy standards, adapted from 2010 standards. The standards are needed and reasonable because they incorporate media literacy, with alignment to the Information and Technology Educators of Minnesota (ITEM) 2019 standards, into each of the strands to show its particular connection to reading (in subpart 2, I), writing (in this standard), and exchanging ideas (in subpart 4, 3). Media literacy connects to writing in that writers need to use evidence to support writing to argue, persuade, inform, or explain. Correct citation of those sources requires an understanding of the rights and obligations of using intellectual property.

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<sup>93</sup> Darling-Hammond, Linda, et. al, *Powerful Learning: What we Know About Teaching for Understanding*, San Francisco: Jossey Bass (2008); and Hattie, John, *Visible Learning: A synthesis of over 800 meta-analyses relating to achievement*, New York: Routledge (2009).

## Analysis of Rules in Subpart 4: Listening, Speaking, Viewing, and Exchanging Ideas

**A. The student will exchange ideas in discussion and collaboration as a listener, speaker, and participant by: (1) including the voices and perspectives of Dakota and Anishinaabe people as well as other perspectives, identities, and cultures like and unlike their own; and (2) expressing one’s own ideas, stories, and experiences.**

This proposed 2020 standard consolidates several 2010 standards and changes the language of the standard to emphasize an authentic exchange of ideas and the various roles that students should assume within those exchanges (listener, speaker, participant). This standard is needed and reasonable because it addresses many of the 21st century skills highlighted in the 2020 ELA Career and College Readiness statement, including demonstrating understanding, value, and respect of other perspectives, identities, and cultures; demonstrating ability to express oneself clearly; reflecting on learning and revising thinking; and demonstrating ability to respond to varying demands of audience, task, purpose, and discipline. Students need to be able to exchange ideas in discussion and collaboration as a listener, speaker, and participant in order to be career, college, and civic ready.

**B. The student will communicate with others by applying knowledge of vocabulary, language, structure, and features of spoken language, while considering the audience and context.**

This proposed 2020 standard is a revision of a more general standard in the 2010 ELA Standards, “The student will adapt speech to a variety of contexts and communicative tasks, demonstrating command of formal English when indicated or appropriate.” The proposed standard is needed and reasonable because it demonstrates an understanding from current research that students need to feel empowered to express themselves using the style appropriate for a broad range of audiences and contexts. The revision of this standard prepares and empowers students to make the decisions about their style of spoken language, considering audience and context. A deep understanding of the impacts of vocabulary, language, and structure of communication as well as an understanding of the feature of spoken language will prepare students to be career, college, and citizenship ready.<sup>94</sup>

**C. The student will thoughtfully and safely access, analyze, and create written, oral, and digital content applicable to task, purpose, audience, and discipline.**

This proposed 2020 standard is one of three media literacy standards, adapted from 2010 standards. The standards are needed and reasonable because they incorporate media literacy, with alignment to the Information and Technology Educators of Minnesota (ITEM) 2019 standards, into each of the strands to show its particular connection to reading (in subpart 2, I), writing (in subpart 3, H), and exchanging ideas (in this standard). Media literacy connects to an authentic exchange of ideas in that students need to safely access, analyze, and create content that applies to the task, purpose, audience, and discipline in order to exchange ideas with others.

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<sup>94</sup> Hammond, Zaretta, *Culturally Responsive Teaching and the Brain: Promoting Authentic Engagement and Rigor among Culturally and Linguistically Diverse Students*, Thousand Oaks, CA: Sage Publications (2015).

## Effective Date

**EFFECTIVE DATE: These standards are effective at the beginning of the 2025–26 school year.**

This section is needed and reasonable because it clarifies the timeline during which the new standards must be implemented. Minnesota school districts generally utilize a five-year implementation cycle to ensure curriculum directors and content specialists have time to adjust and adapt teaching curriculum and resources. This timeline also provides sufficient time for the department to communicate with the field and create supportive technical assistance guidance.

## Repealer

**Minnesota Rules, parts 3501.0640-0655 are repealed.**

The department considered amending the existing rule language as well as adopting entirely newly drafted language or a combination of the two approaches. Ultimately, the department, in conjunction with the Committee, chose to recommend adopting new English language arts standards and repealing the existing Minnesota Rules governing K–12 academic standards in English language arts in their entirety. This decision was made to better align with current research on the Science of Reading, creating more pathways for students to engage in the learning, and to realign to reduce overlap and make connections more authentic.

The repeal of the existing rules is necessary and reasonable for the reasons articulated above for the reasonableness and necessity of the new standards. Moreover, the new standards better align with current pedagogical research on reading, writing, and the exchange of ideas. Adoption of the proposed rule without repeal of the existing rules is additionally necessary and reasonable, because failing to do so would create confusion for school districts as they attempt to plan curriculum for their students and prepare students for assessments. Assessment tools used by the Department to measure academic progress are tied to the standards, and as such it is reasonable and necessary to repeal the previous standards which will no longer be tied to assessments.

## Conclusion

The 2020 review process brought together a talented group of Minnesotans to review and recommend revisions to Minnesota’s 2010 K–12 Academic Standards in ELA. This Committee followed an organized, detailed, and thorough review and revision process for the proposed standards and supporting benchmarks. Throughout the process, the Committee carefully considered the feedback of ELA education experts, education and language and literacy organizations, additional stakeholders, and the general public. The Committee utilized the latest research and other ELA education resources, including national and other state standards in all of the ELA areas. The Committee also carefully reviewed state statutory requirements and incorporated these into the proposed standards. With this information and input, Committee members engaged in thoughtful and comprehensive discussion, review, and revision, which led to proposed rule language and supporting benchmarks that promote and support equitable, high quality ELA education in Minnesota for all students.



Overall, the Committee and the department believe that the review and revision of the Minnesota ELA academic standards and supporting benchmarks feature many improvements over the existing ELA standards, as discussed above. The Committee and department anticipate that the proposed K–12 academic standards in ELA will be a welcome resource to teachers and students in the study of ELA in Minnesota. The department agrees with the recommendations from the Committee and recommends the replacement of the 2010 rules regarding academic standards in ELA with the new proposed standards and supporting benchmarks.

Based on the forgoing, the proposed amendments are both needed and reasonable.

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Heather Mueller, PhD, Commissioner  
Minnesota Department of Education

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