BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Empowering Parents and Protecting Children	)	MB Docket No. 09-94
in an Evolving Media Landscape	)	

COMMENTS OF THE CENTER FOR MEDIA LITERACY
ON FCC NOTICE OF INQUIRY REGARDING
EMPOWERING PARENTS AND PROTECTING CHILDREN
IN AN EVOLVING MEDIA LANDSCAPE

The Center for Media Literacy ("CML") hereby submits these Comments in response to

FCC 09-94, Notice of Inquiry released October 23, 2009, in which the Commission sought

comments on empowering parents and protecting children in an evolving media landscape.

SUMMARY

The Center for Media Literacy respectfully files these Comments because the Center has,

since its inception in 1989, unwaveringly supported media literacy education intended to help

students gain "the critical thinking skills needed to make smart choices" (Notice of Inquiry,

Section 51, at 20). Much has changed since 1989, and the need for schools to teach critical

thinking and process skills has only increased. In an era where information is expanding

exponentially, learning standards which primarily emphasize coverage of content no longer serve

the needs of students. Students must be able to access, analyze, evaluate, create and interact with

the information which is being delivered to them at ever-greater speeds on an ever-widening

array of media platforms. Media literacy education helps students acquire key digital media and

information management skills, and full integration of media and technology literacy into the

core curricula of US schools would leave students immeasurably "better positioned to compete in today's workplace" (Notice of Inquiry, Section 19, at 7).

The Center wishes to inform the Commission that a media literacy education which encourages the development of critical thinking skills does much more than help students assess the risks of using electronic media. They gain the critical autonomy they need to negotiate their lifelong relationship with media. CML believes that children should be empowered through education, as well as parents. By the same token, empowerment entails responsibility, and we believe that all stakeholders—the media and communications sector, parents, teachers, schools, and students themselves—need to fully engage in the enterprise of building communities of responsibility and care, online and off. Not only is this the best means of safeguarding children from the risks of electronic media, but it is also the best means for preparing students to become wise consumers of media and responsible media producers, as well as active and democratic participants in today's global culture.

In Section II, we suggest that a minimum level of media literacy can be attained through instruction which focuses on the acquisition of critical thinking skills, with an emphasis on the ability to ask important questions. We assert that students, teachers and parents may attain a minimum necessary level of media literacy when they engage in sustained practice with the CML framework of Key Questions and Core Concepts of media literacy, and demonstrate the ability to conduct a rigorous, close analysis of a media text.

In Section III of these comments we discuss model programs and best practices for media literacy. We briefly discuss the implications of teaching a media literacy curriculum based on critical thinking skills. Chief among them is the development of a process of inquiry which fundamentally alters the hierarchical organization of classroom instruction.

We offer a brief survey of current, organized media literacy activity in the US, ranging from academic degree programs and university-based organizations and institutes to corporate- and government-sponsored organizations and projects. The contributions of international organizations and government activities are noted, and we discuss the importance of CML curricula and programs (past and present) to the development of media literacy education in this country and abroad. We also draw on many years of staff field experience to offer what we believe are the essential criteria for the successful implementation of media literacy programs in US schools. Among other items, we discuss best practices for initial planning, curricular planning to meet state standards, structuring student work in the classroom, methods of assessment, self-assessment among staff, professional development, and standards for teacher competence.

In Section IV, we comment on the need for government action to bring media literacy instruction into the mainstream of educational practice in the United States. Only a handful of media literacy programs have been fully implemented in US schools, standards for media literacy instruction have never been fully articulated in any state or district, and media literacy demonstration projects have been chronically underfunded.

We recommend several actions which the Commission and other federal agencies can take to support the expansion of media literacy education in the United States. We believe that short, engaging activities based on the CML framework of Key Questions and Core Concepts can be used as an effective tool for promotion of media literacy education, and that these activities could be incorporated into a public information portal and/or social marketing campaign organized by the Commission. In addition, we recommend that the Commission use its regulatory powers to create incentives for the participation of media and communications

industries in media literacy education for consumers, and we suggest that the Commission

consider the Digital Britain initiative in the United Kingdom as a possible model for strategy and

implementation. We also argue that industry participation in this country could be motivated by

the prospect of a large pool of candidates for employment who have acquired a comprehensive

set of relevant analytic and creative skills.

Among other federal agencies, the Centers for Disease Control and the National Institutes

of Health could play an important role in advancing media literacy education in the United

States. The majority of fully-funded media literacy programs have combined health education

with media literacy instruction, and co-operation between communities, schools and county, state

and federal health agencies have led to a number of successful programs.

Finally, the Center recommends that the Department of Education take a leading role in

the "mainstreaming" of media literacy education.   As a first step, the DOE should mandate the

inclusion of a basic media literacy course in the curricula of all US schools. The DOE should

support the articulation of standards which can clearly demonstrate the feasibility of integrating

media literacy instruction across the entire curriculum, and we recommend that the DOE do so

through sponsorship of research, evaluation and standards design. The Center also strongly

recommends that the DOE and other government agencies fund district-level projects and state-

level initiatives to catalyze educational change.

BACKGROUND

The Center for Media Literacy has been a pioneering force in the development and

practice of media literacy in the United States. Its origins stem from *Media&Values* magazine, a

publication begun in 1977 as a graduate school project by CML founder Elizabeth Thoman.

Our mission is to help children and adults prepare for living and learning in a global media culture by translating media literacy research and theory into practical information, training and educational tools for teachers and youth leaders, parents and caregivers of children.

<u>History and Milestones</u>

- CML provides leadership, teacher training and implementation programs, public education, plus publication and distribution of teaching resources for the media literacy field - locally, nationally and, now with the Internet, around the world.
- In 2007, CML introduced Questions/TIPS, a new framework for analysis in both deconstructing and constructing media messages. Q/TIPS™ is a central feature of the Second Edition of CML's landmark book, *Literacy for the 21st Century: An Overview and Orientation Guide for Media Literacy Education*, published in 2008.
- In 2002, CML introduced its CML MediaLit Kit™, a framework for teaching and learning in a media age. The MediaLit Kit™ is based on the thinking and writings of leading academics and practitioners in media literacy over the past 50 years.
- In 2001, in collaboration with the Los Angeles Unified School District, the Education Division of the Music center of L.A. and AnimAction, Inc., the Center received one of 17 demonstration media literacy and the arts grants awarded by the U.S. Department of Education and the National Endowment for the Arts. The 3-year project, titled Project SmartArt, provides a range of media literacy opportunities for teachers and students in inner city LA.
- CML is a founding organizational member of the Association for Media Literacy Education, a national membership organization chartered in 2001 to organize and host the National Media Education Conference every two years and to promote professional development in media literacy education in the USA.
- CML provides teacher training internationally. Through the Felton Media Literacy Scholars Program, established in 1997 with a major gift from television pioneer Norman Felton, CML established a national model for teacher training in the field of media literacy education. Hundreds of Southern California teachers have participated in CML's training events through the years.
- CML's pioneering curriculum, *Beyond Blame: Challenging Violence in the Media*, first published in 1995 with grants from the Carnegie Corporation and other foundations, has been updated for middle school students and has been evaluated by UCLA as part of a seven-year longitudinal study funded by the Centers for Disease Control.
- CML averages thousands of un*ique visits per day on its website, www.mediali*t.org – the most referenced media literacy site on the World Wide Web.

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I. Empowerment and Responsibility for All

Technology and the Changing Context of Education

In order to fully appreciate the role of media literacy instruction in the education of children, it is necessary to understand the social changes brought by recent technological developments, and the reasons why reform of our educational institutions is required to meet them. Forty years ago, Brazilian educator Paulo Freire criticized the "banking" system of education in which teachers held valuable knowledge and bestowed it upon students. Freire's own model of education, which envisioned students taking charge of their own education, was anti-authoritarian and radical for its time. [1] Today, reasonable parties can debate Freire's "pedagogy of the oppressed," but we ignore his criticism of the banking model of knowledge at our peril.

In the 19th century, the "transmission" model of knowledge still had some basis in fact. Access to books and other printed materials was relatively limited, and libraries were necessary repositories of information. In the United States, the libraries established by Andrew Carnegie nurtured an entire generation of writers and intellectuals. The role of teachers at this time was to convey to students the knowledge acquired through their individual academic preparation, and American school curricula were formed to support the delivery of this knowledge. But today's students are almost literally awash in an exponentially expanding sea of information delivered on an ever-widening array of media platforms. Some of it may not even come in the form of a written text. The question now becomes, what information is *useful*, to whom, and in what contexts?

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[1] See Freire, *Pedagogy of the Oppressed*. New York: Herder and Herder, 1970

Industry has seized on every advance in information and communications technologies to enhance its productivity, and the global economy is quickly becoming a knowledge economy. In order for students to thrive in this environment, they must learn how to build knowledge by acquiring the process skills—also known as critical thinking skills—needed to access, analyze, evaluate, create and interact with the many forms of media through which information is delivered. As the Partnership for 21st Century Skills observes in their report *Learning for the 21st Century*, "As the world grows increasingly complex, success and prosperity will be linked to people's ability to think, act, adapt and communicate creatively" (at 10).[2]

Mainstream educational institutions, whose curricula and standards are still based on the transmission of academic content within traditional disciplines, are in urgent need of reform, and to date, most stakeholders in these institutions view media literacy as an adjunct to instruction within the disciplines. But academic content by itself is a poor substitute for knowledge, and media literacy instruction, which offers students powerful tools for knowledge acquisition and creation, has a vital role to play in the transformation of education in US schools in this century.

Students Should Also Be Empowered

Our first comment on the matter before the Commission concerns the title of the Notice of Inquiry: "Empowering Parents and Protecting Children in an Evolving Media Landscape." If media literacy instruction offers powerful tools for helping students build knowledge, it also offers students empowerment through education. The Center for Media Literacy--as well as most professionals in the media literacy field—strongly believe that students should be empowered, as well as the parents, teachers and administrators who care about them. The Notice of Inquiry in this matter seems to treat media literacy instruction as a second line of defense

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[2] Partnership for 21st Century Skills, 2002 (available at http://www.21stcenturyskills.org/images/stories/otherdocs/p21up_Report.pdf)

against the risks of media use. But media literacy is neither offensive nor defensive. Instead it is

a proactive approach which trains students to evaluate and respond to the risks they encounter in

a media-saturated world. As *Literacy for the 21st Century*, our orientation guide to media

literacy education states, "Media literacy does NOT mean 'don't watch;' it means 'watch

carefully, think critically, participate actively.' " [3]

In several instances, the Notice of Inquiry makes observations and asks questions about

risk which point to the utility of media literacy instruction. Section 34: "While we discuss. . .the

means parents have to protect children from the risks of electronic media use, those means might

be less useful in protecting children from advertisements" (at 14). Section 40: "Is it feasible to

block advertisements that may be inappropriate for children on various media platforms?" (at

15). Section 41: "While media convergence has many benefits, it may also make it more

difficult for parents to protect their children from the risks of media exposure" (at 16). And the

Notice also reviews this salient finding from the Child Safe Viewing Act report: ". . . [T]he

record in that proceeding indicated that no single parental control technology available today

works across all media platforms" (Section 44, at 17). As media platforms multiply, the risks

seem to multiply as well.

The Notice of Inquiry itself suggests the need for media literacy instruction as a primary

means to address this increased risk. In a report on parental controls by Adam Thierer ("Thierer

Report"), Thierer asserts, "Regardless of how robust they might be today, parental control tools

and rating systems are no substitute for education—of both children and parents. . . . And

government can play an important role by helping educate and empower parents and children to

help prepare them for our new media environment" (Section 51, footnote 97, at 20). The best

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[3] Jolls and Thoman, *Literacy for the 21st Century: An Overview Guide to Media Literacy Education*, 2nd ed., Center for Media Literacy, 2008, at page 42 (available at http://www.medialit.org)

available parental control technologies can become obsolete in as little as two years, necessitating periodic if not continual review by the Commission. We suggest that the Commission's burden would be reduced if periodic reviews were supplemented by ongoing media literacy education.

Understandably, this Notice focuses on the uses of media technologies, but the value of media literacy education comes into greater focus when we consider the fact that the media are inextricably intertwined with social processes. Media do not simply pose risks or offer benefits. Their global distribution and their ability to capture the attention of children give them-- potentially-- the power to replace parents, families, peers, schools and religious organizations as primary socializing agents in American society. [4] The Global Village envisioned by Marshall McLuhan has become a reality, and where parents and other known adults in face-to-face communities once provided youth with a trusted filter through which they could learn about differing values, lifestyles and points of view, globalized media are now performing this function, unfettered by local custom or control.

Yet children are children and still need guidance. In a 2009 curricular implementation program conducted by the Center for Media Literacy, K-12students were given pre- and post-tests which included the true/false question, "Media messages affect me." Though students showed significant improvement in the post-test, over half continued to mark the statement as "false." Society as a whole "normalizes" the media, and parents and teachers clearly have a role to play in helping children become aware of the influence that media have on their lives. But the power that these media have as socializing agents also makes it imperative that parents and teachers do more than protect children. They need to help children gain greater critical

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[4] See Strasburger and Kadin, eds., *Adolescents and the Media*. Thousand Oaks, CA: Sage Publications, 1995. See also Gerbner et al., *Growing up with Television: the Cultivation Perspective*, in Bryant and Zillman, eds., *Media Effects*. New York: Lawrence Erlbaum, 2002.

autonomy so that they can successfully negotiate their relationship with media on a lifelong basis.[5] And there is already evidence of the efficacy of this approach. For example, children who see alcohol advertising are less likely to be influenced if they have media literacy skills to question the images they see on screen, and their decision-making process can also be positively affected in other risky situations.[6]

Community, Responsibility and Democracy

The fact that media are such a potent force in society also points to the need for greater investment in media literacy education among all stakeholders—from media companies, from schools, from parents and teachers, and from students themselves. Rather than reacting to content and ratings requirements, the media industries need to fund, promote and even broadcast programs to help children become critical consumers of media. Schools should be integrating media literacy skills across the curriculum and offering a media literacy course rather than merely issuing Acceptable Use Policies (More detailed discussion follows in Section IV of these comments *infra*). Parents need to communicate with their children to establish a balanced "media diet," [7] and parents and teachers need to take the time to familiarize themselves with the media that students are consuming and producing, and take a co-operative and participatory role with students as opportunities permit them to do so. Furthermore, students are not simply victims who deserve the protection of adults. They need to shoulder responsibility for their own education as well. Many 'tweens' are cyberbullies, numerous teens are sending sexual

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[5] See Jolls, Walkosz and Sund, *Global/Local: Media Literacy for the Global Village*. Conference paper published by UK Office of Communications, 2008.

[6] See Austin and Johnson, *Effects of General and Alcohol Specific Media Literacy Training on Children's Decision-Making About Alchohol*. *Journal of Health Communications,* Vol. 2, No. 1 (1997), pps. 17-42. doi: 10.1080/108107397127897

[7] In a recent report released by the journal of the American Heart Association, Australian researchers found that each hour per day spent in front of a television screen was linked with an 18% greater risk of death from cardiovascular disease, and with an 11% greater risk of all causes of death. See Jeanine Stein, "Watching TV shortens life span, study finds," Los Angeles Times, January 12, 2010.

solicitations online,[8] and many teens and college students fail to consider the impact which "sexting" can have on their lives.[9]   In short, we need to build new communities of responsibility and care, online and off, and all stakeholders involved need to participate actively within them.

Moreover, children have other roles to play in these communities aside from that of victim or perpetrator. Ongoing media literacy instruction helps students become wise consumers and responsible producers of media, and it also provides them with the tools they need for effective citizenship in a digital world. They begin by understanding their power as audiences to accept or reject the worldviews represented by the media messages they receive. As Walkosz, Jolls and Sund write, "Where would a company or a university or a nonprofit or an entertainer or an executive or a politician be without us, the audience?" (at 8). Armed with critical thinking and information skills, they can produce media and use collaborative communication tools to fully engage in public conversations on issues of common concern. For example, students as young as kindergarten age produced public service announcements about media violence during Project SMARTArt in Los Angeles. These media constructions engaged the children, teachers and parents alike in showcases conducted at the school. So, in conclusion, why should this Inquiry focus narrowly on the protection of children today when an appropriate education could empower them to become the innovators and leaders of tomorrow?

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[8] The Second Youth Internet Safety Survey of 2005, carried out by The National Center for Missing and Exploited Children, the Crimes Against Children Research Center of the University of New Hampshire, and the Office of Juvenile Justice and Delinquency Prevention, reported that 14% of unwanted sexual solicitations were made by offline friends and acquaintances (at 15-16) (Report available at http://www.unh.edu/ccrc/pdf/CV138.pdf).
[9] The National Campaign to Prevent Teen and Unplanned Pregnancy released a report titled "Sex and Tech" which published the results of a survey of 1,280 teens (13-19) and young adults (20-26) conducted by TRU Research in late 2008. The survey revealed an apparent conflict between knowledge and attitudes. 75% of teens and 71% of young adults said that sending sexually suggestive content via electronic media "can have serious negative consequences." Yet 39% of teens and 59% of young adults continued to do so anyway, with 20% of teens and 33% of young adults sending nude or semi-nude images of themselves (at 3) (Report available at http://www.thenationalcampaign.org/sextech/PDF/SexTech_Summary.pdf).

II.   Requirements For a Minimum Necessary Level of Media Literacy

At CML, we believe that the acquisition of critical thinking skills is not only a minimal requirement for media literacy. Teaching critical thinking and process skills is foundational to successful media literacy instruction. Asking relevant questions which set the stage for deeper exploration and analysis are essential to the acquisition of media literacy skills. It may also be worth pointing out that learning how to ask key questions is foundational to intellectual inquiry in general and has been a part of the human experience since Socrates became the gadfly of Athens. Asking important questions is an activity which crosses disciplinary boundaries, and good teachers often have an intuitive sense of how to weave them into their conversations with students.

 Here's a sampler:

- Is this new scientific study on diet and weight valid?
- What are the implications of ranking friends on a social networking site?
- What does a "photo-op" mean?

In the United States, the practice of asking questions to stimulate critical thinking is rarely recognized as something that should be cultivated in classrooms, let alone embedded in state or district curricula. As a result, those questions usually emerge as a by-product as teachers go about the business of ensuring student mastery of content knowledge within individual subject areas. The good news is that media literacy curricula organized around key questions can be designed to meet the needs of teachers in any discipline, and can easily capture the interest of students where standard instructional materials do not.

In designing curricula intended to help students ask questions and acquire critical thinking skills, most educators end up reaching for the core concepts which have shaped the development of their respective disciplines. In the field of media literacy, various adaptions of

core concepts have been developed, starting with 18 concepts named in 1985 by Len Masterman in his seminal work, *Teaching the Media*, and with eight core concepts used in Canada as a way of structuring curriculum. The National Association for Media Literacy Education (NAMLE) provides a listing of Core Principles for media literacy, as do other organizations.

The Center for Media Literacy (CML), one of the pioneering media literacy organizations in the United States, provides a research-based framework through the release of its original CML MediaLit Kit™ in 2002. Designed to provide a common vocabulary and approach, the CML MediaLit Kit features Five Core Concepts for Media Literacy, and provides Five Key Questions for deconstruction of media messages. Recognizing that skills of critical analysis are just as important during media production, in 2007 CML also developed Five Key Questions for construction of media messages. This pioneering CML framework, called Questions/TIPS (Q/TIPS), addresses questions from the viewpoint of both consumers and producers.

Based on the work of media scholars and literacy educators in the U.S. and from around the world, each of the Five Key Questions flows from a corresponding Core Concept and provides an entry point to explore the five fundamental aspects of any message in any medium: authorship, format, audience, content and purpose. Starting with simple versions of the questions for young children and moving on to more sophisticated analyses for adults, anyone can apply the questions to a variety of texts. Because the questions are succinct, media literacy literature includes a variety of "guiding questions" to tease out deeper understanding.

Learning to ask and apply the Five Key Questions is a skill that is not mastered the first time out. Once learned, however, the process becomes automatic as users build the habit of routinely subjecting media messages to a battery of questions appropriate to their age and ability.

As the cornerstone of the media literacy process, CML's Five Key Questions provide a

shortcut and an on-ramp to acquiring and applying critical thinking skills in a practical, replicable and consistent way. They are an academically sound and an engaging way to begin, and they provide curriculum developers with a usable structure that can be applied to *any* subject. The CML framework, Questions/Tips (Q/TIPS), provides a point of entry for thinking critically and a quick process for continued skill development on a lifelong basis:

CML's FIVE CORE CONCEPTS AND KEY QUESTIONS

FOR CONSUMERS AND PRODUCERS

Media Deconstruction/Construction Framework

CML's Questions/TIPS (Q/TIPS)
© 2002-2007 Center for Media Literacy, www.medialit.org

#	Key Words	Deconstruction: CML's 5 Key Questions (Consumer)	CML's 5 Core Concepts	Construction: CML's 5 Key Questions (Producer)
1	**Authorship**	Who created this message?	All media messages are constructed.	What am I **authoring**?
2	**Format**	What creative techniques are used to attract my attention?	Media messages are constructed using a creative language with its own rules.	Does my message reflect understanding in **format**, creativity and technology?
3	**Audience**	How might different people understand this message differently?	Different people experience the same media message differently.	Is my message engaging and compelling for my target **audience**?
4	**Content**	What values, lifestyles and points of view are represented in or omitted from this message?	Media have embedded values and points of view.	Have I clearly and consistently framed values, lifestyles and points of view in my **content**?
5	**Purpose**	Why is this message being sent?	Most media messages are organized to gain profit and/or power.	Have I communicated my **purpose** effectively?

The differences inherent in the Key Questions for Deconstruction and Construction are essentially differences in decision-making and control. When audiences "consume" or analyze media messages, they have no control over the content of the message. Instead, they only control the meaning that they make from the message and how they might want to respond in making decisions or taking action. They can accept or reject the message, but unless the message is "remixed" and "rehashed," the audience cannot change it until they enter into an active production process.

But when an individual or team "produces" or constructs media messages, they *do* control the content of the message to the extent that they have autonomy or self-awareness. Yet they always bring themselves to the message, with all of the experiences and knowledge that inevitably affects the content of their messages, because by definition, human beings have imperfect understanding, and each human being is unique.

In constructing a message, a producer has many decisions to make. The producer is not just deciding how to make meaning from his own message; through his construction techniques, he is also influencing how others might make meaning from it, and possibly reacting to input from others. All producers have both personal and social power, and therefore personal and social responsibility toward their audience. Where there is communication, there is audience, even if it is an audience of one!

For all these reasons, the analysis process encouraged by the Five Key Questions and the Five Core Concepts carries with it an implied decision-making process. This process is represented through CML's Empowerment Spiral, which is partly based on the work of Paulo Freire. The Empowerment Spiral starts with:

- awareness of an issue or message,

- analysis through the Five Key Questions,

- reflection through processing our learning, and

- action -- whether we decide to take action or not.

Explicit instruction in the Empowerment Spiral is not necessary for successful use of the CML framework; however, in the same way that some teachers spontaneously insert questions for critical thinking in the midst of curricula which have been structured for other purposes, elements of the Empowerment Spiral also tend to emerge when students and teachers work together with the CML framework.

Close Analysis

Defining the "minimum necessary level of media literacy" becomes an easier task now that we have conducted an adequate review of Key Questions and Core Concepts of media literacy. In order for students, teachers and parents to demonstrate this minimum level of skill, they must be able to apply the key questions and core concepts to a detailed analysis of a discrete media product. At CML we call this practice "Close Analysis" or "Deep Deconstruction." The objective is to teach students to look closely at how a media message is put together and consider the many interpretations that can derive from it; to teach students to analyze and to know the difference between describing a media asset with evidence and facts, and interpreting a media asset using opinions and judgments. As students and teachers gain skill and practice in conducting a close analysis, they can perform the task more quickly and efficiently. This ability applies across all disciplines inside and outside the classroom, and also builds a common vocabulary for discussion.

Section 51 of the NOI asks whether minimum necessary "elements" of media literacy should include knowledge of the benefits of the electronic media landscape and how to access beneficial content, as well as knowledge of the risks of the electronic media landscape and how to avoid them (at 20). We are not listing these as minimum necessary elements of media literacy. But our response to one of the questions in Section 52 of the NOI may help to explain our position with regard to student outcomes. The question: "At what age should children begin to be taught media literacy?" (at 21). Our experience is that children as young as age five have been able to use the CML framework to analyze sample advertisements and understand the profit motives which drive them. We have also worked with schools with Pre-K students, and there, the emphasis has been to teach parents some basic media literacy. For younger children, CML has developed a set of Key Questions to Guide Young Children, which provide a variation of the basic Five Key Questions that we have developed. Given the results we have had with years of field work with younger students, we believe it is reasonable to expect that sustained practice with the Key Questions and Core Concepts, along with practice in Close Analysis, will steadily increase students' knowledge of the risks and benefits of electronic media use.

III.   **Model Programs and Best Practices**

The Power of Inquiry

The ability to conduct a Close Analysis is only the beginning when it comes to fostering a successful media literacy program. The full implementation of a media literacy program calls for a fundamental realignment of classroom settings, staff coordination and organization development, teaching strategies, professional development, curricula, and assessments.

A recent YouTube video called *A Portal to Media Literacy,* [10] which has tallied more than 100,000 viewings since its release in early summer, 2008, clearly captures how media literacy changes the physical as well as the mental landscape of the classroom. The physical layout of classrooms typically feature student desks facing in one direction – toward the teacher and whiteboards or "Smartboards." The teacher is the focal point of the class; the most important communication is presumably a two-way exchange between the teacher and each student facing him/her.

But in teaching students a process of inquiry, and in utilizing today's powerful technology tools which allow for interaction and collaboration world-wide, the teacher is no longer the font of all wisdom, but instead, a guide who sets goals, parameters and assignments with state education standards in mind, helping students learn a process of inquiry that will often take them outside the classroom walls and into an engagement with their peers and others who can assist them. As the saying goes, the teacher is no longer the "sage on the stage, but a guide on the side."[11] This also fits with the freedom that students now have to take classes over the internet, taking advantage of learning anywhere, anytime.

Not only does this approach allow students to sometimes become the "teacher" and to learn from each other – thus valuing the intellectual capacity and everyday contributions of children -- but it also encourages teachers to collaborate more and to reinforce the skills that all classes have in common, rather than just the content knowledge which distinguishes each class. By instilling a common methodology such as the Five Key Questions of media literacy for critical thinking and content analysis, students carry a research-based process of inquiry with

[10] See Michael Wesch, *A Portal to Media Literacy*. Presentation at University of Manitoba, June 2008 (available at http://www.youtube.com/watch?v=J4yApagnr0s
[11] See Allison King, *Inquiry as a Tool in Critical Thinking*, in Diane F. Halpern, ed., *Changing College Classrooms: New Teaching and Learning Strategies for an Increasingly Complex World*. San Francisco: Jossey-Bass, 1994.

them from grade to grade, from class to class, from subject to subject, from classroom to home, from school to work. This enables and deepens the development of a common vocabulary and a common understanding of both the media messages (the content and its forms) and the systems employed in global communications. It is these messages and systems that inform the every-day lives of students everywhere, regardless of country or location.

The new Common Core standards for language arts, devised through a committee comprised of the National Governors Association Center for Best Practices (NGA Center) and the Council of Chief State School Officers (CCSSO) in partnership with Achieve, ACT and the College Board, call for schools to address the important topics of media and technology. This is a major step forward, for without inclusion at the policy level in education standards, teachers cannot reasonably be expected to spend valuable time on teaching these skills. But these skills should no longer be seen as "add-ons." They are central to teaching and learning in today's education system if schools are to engage students and remain relevant to students' lives, and to the world outside the classroom.

Programs throughout the World

Since this new way of teaching and learning is still in its infancy and not embedded in schools' administrative and curricular systems, there are a limited number of programs which have been both implemented and documented in the United States. As a discipline, media literacy has emerged at the grassroots and survived through the tenacious efforts of individual teachers who are often unsupported and isolated from their peers. University academics have also fostered media literacy through efforts such as Appalachian State University's program, which offers a masters degree in media literacy through its Masters of Arts in Educational Media program; Project LookSharp at Ithaca College; the Center for Excellence in Media Literacy at

Gonzaga University; Temple University's Media Education Lab; Project New Media Literacies (NML), a research initiative based within MIT's Comparative Media Studies program; the Friday Institute for Education Innovation, and the University of Dayton's online certification program for media literacy. Some corporate projects include early efforts such as Channel One's media literacy program, as well as Discovery Education Inc.'s *Assignment: Media Literacy* project (with the Maryland Dept. of Education), and Cable in the Classroom's ongoing media literacy efforts. In 2008, the Federal Trade Commission (FTC) undertook a new initiative addressing advertising literacy, and in 2008, the U.S. Dept. of Education held its first formal information session on media literacy for its staff.[12] There are two U.S. membership organizations which address media literacy, the National Association of Media Literacy Education (NAMLE), which holds a national conference every two years, and the Action Coalition for Media Education (ACME).

This brief snapshot of U.S. media literacy work undoubtedly leaves out many initiatives and research efforts that have emerged in recent years, as media literacy is a "viral" phenomenon that represents a world-wide movement. Nascent nonprofit organizations devoted to media literacy are emerging in countries as diverse as South Korea, China, Peru, Brazil, India, Pakistan and Israel. The European Commission, in 2009, adopted guidelines for media literacy education in all European Union (EU) countries, and the United Kingdom (UK) has, through its Office of Communications (OfCom), a staffed unit solely focused on media literacy. The UK has conducted surveys of the media literacy of its entire population (Office of Communications, *Media Literacy Audit*, 2009), and its efforts (which are part of the Digital Britain initiative) probably represent the most advanced governmental work in the field. In addition, countries

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[12] Doug Levin and Tessa Jolls, *Media Literacy: Teaching and Learning for Today's Classroom.* Presentation and information session for US Department of Education, May 2008.

such as Canada require media literacy for high school graduation, and the Arab Bureau of

Education for the Gulf is currently conducting a research and development program for media

literacy.

CML's pathbreaking books outlining its framework and lesson plans, *Literacy for the 21st Century* and *Five Key Questions that Can Change the World* (respectively), have been translated

into Spanish, Portuguese, Turkish and Arabic, and CML has received inquiries from literally the

world over, requesting information on resources, research and program implementation. The

Center began work in this field in the early 1980's as a nonprofit publisher of Founder Elizabeth

Thoman's *Media&Values Magazine* and Media Literacy Workshop Kits. CML began

implementing school-based programs in the early 1990's upon Tessa Jolls' joining the

organization as executive director. Because CML typically receives funding to conduct health-

related programs, the implementations that CML has conducted address topics such as smoking

cessation, nutrition, violence prevention, and body image and gender. However, utilizing its core

methodology of the Five Key Questions, CML has connected these topics to other disciplines

such as language arts, social studies, math and science, meeting state education standards for

these subjects while teaching media literacy and health-related content.

Project SMARTArt, a three-year federal demonstration grant sponsored by the U.S. Dept.

of Education and the National Endowment for the Arts, led CML, the Los Angeles Music Center

Education Division, AnimAction, Inc. and Los Angeles Unified School District's Leo Politi

Elementary School to a new understanding of media literacy and the implications for developing

a full-scale implementation program. This work was complemented by a seven-year longitudinal

study of CML's curriculum *Beyond Blame: Challenging Violence in the Media*, originally

developed in 1994 and subsequently revised in 2007. The study was sponsored by the Centers

for Disease Control and conducted by Dr. Theresa Webb of UCLA's Southern California Injury

Prevention Research Center, and involved more than 3,000 students within seven school districts

in Southern California. It addressed the effectiveness of media literacy as a health intervention

strategy as well as a methodology for students' acquisition of content knowledge; the study also

examined the impact of professional development on program delivery and effectiveness.

During the past three years, on a for-profit basis under the continuing leadership of Tessa Jolls,

CML has helped implement school-wide, preK-12 programs in both U.S. and Peruvian schools,

conducting professional development and helping schools fully utilize the CML framework and

teaching methodologies.

Promising Results

As the digital world attracts more and more children, with an average of 8:33 hours of

daily media exposure for youth aged 8-18 in 2005, [13] the call for media literacy is growing as

well, both at policy levels and in schools. A growing body of research on the efficacy of media

literacy is emerging from projects world-wide, but still, research on teaching media literacy,

especially digital media literacy, is in its infancy. And while research on the effectiveness of

media literacy education as a strategy to promote health is also immature, [14]there are

inconsistencies about how media literacy core concepts and skills are addressed, making the task

of comparing results between studies all the more challenging. The immaturity and relative

inconsistency of the research, along with the difficult of accessing research that is current with

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[13] See Roberts and Rideout, *Generation M: Media in the Lives of 8-18 Year-Olds*. Kaiser Family Foundation, March 2005 (available at http://www.kff.org/entmedia/upload/Generation-M-Media-in-the-Lives-of-8-18-Year-olds-Report.pdf)
[14] See Linda Bergsma and Mary Carney, *Effectiveness of Health-Promoting Media Literacy Education: A Systematic Review*. *Health Education Research Advance Access*, Vol. 23, No. 3 (2008), pps. 522-542. doi: 10.1093/her/cym084

the most recent innovations in media and technology, make it hard to easily match research results with recommended teaching practice.

Nevertheless, CML and others have made important strides in gaining understanding in how media literacy can be taught, and what the benefits of such instruction are. For example:

- By the end of Project SMARTArt, teachers demonstrated that combining media literacy and the arts, while meeting CA State Education standards for Language Arts (LA) and English Language Development (ELD), is very possible and fairly easy, with the right training, practice and structure. This notion was validated when, *within a one-hour period*, teaching teams were able to create engaging, integrated activities for classroom use, while connecting the *Five Key Questions* of Media Literacy with state standards for ELD, LA, and Visual and Performing Arts (VAPA). These teaching teams were comprised of Project SMARTArt teachers and teaching artists, and divided into two groups (Grades K-2 teachers and Grades 3-5 teachers), so that the activities were relevant and could be used by the team participants.

  This type of flexibility in making curricular connections is essential, since every school district in every state uses different combinations of core curricular materials. CML's *Five Key Questions* of media literacy can apply to any curricular content, and the arts are used in every form of self-expression, in any project students create to demonstrate their mastery of core subject areas. Through state education standards and through an understanding of how to apply media literacy and the arts into core curricular areas, teachers now have powerful and flexible ways to connect their classrooms to the real world and to provide students with the critical thinking and media construction skills that they need to represent themselves effectively.

- Results from UCLA's evaluation of CML's new 10-lesson curriculum *Beyond Blame: Challenging Violence in the Media* show that students can learn a basic method for critical thinking, using CML's Five Key Questions for deconstruction, *in less than eight hours of face-to-face instruction from teachers who have undergone a one-day professional development workshop*. Recent research (Annandale, 2009) also supports that in longitudinal studies, children who participated in a media literacy cognitive intervention on violence prevention experienced an immediate reduction in willingness to use aggression after exposure to violent media.

These findings are strong arguments for the practicality and effectiveness of offering media literacy instruction, since both teachers and students alike have demonstrated that they can quickly acquire the process skills and content knowledge that ultimately affect choices and behavior.

Best Practices—The Criteria for Success

To provide a replicable program, specific, consistent and readily available tools are necessary. With these tools, no "cookbook" type of textbook is needed. Instead, teachers internalize the methodology provided by the basic Five Core Concepts and Five Key Questions and other inquiry techniques through professional development and everyday practice. Teachers are able to make the linkages necessary to all curricular subject areas; their lesson plans are informed by this new understanding. This provides a creative way for teachers to meet standards while incorporating contemporary media content and teaching information-processing skills. If teachers consistently provide opportunities for students to apply the *Five Key Questions* of media literacy, then students also internalize this methodology for thinking critically about media content (including the content in textbooks!).

As CML learned from the Project SMARTArt experience, it is just as important to understand one's own approach to the project as well as project goals, structure and tools. Here are some important points:

- A clearly articulated philosophy for media literacy is essential, so that aims are clear. The CML Philosophy of Education [15] emphasizes empowerment rather than censorship or media bashing. It is important to insure that administrators and teachers recognize the importance of this philosophy, so that a process of inquiry is encouraged rather than a series of directive, opinionated engagements with media content. With an analytic method resting on inquiry, individuals are free to engage with media on their own terms, drawing their own conclusions and making their own choices. Without philosophical understanding and agreement, a program can easily be derailed due to ideological disagreements.

- In teaching content knowledge as well as process skills, the core elements of any discipline are represented in instruction, with connections made to media and media literacy. Before teachers can teach subjects like media literacy and the arts, or media literacy and social studies, they must first develop knowledge, understanding and skills. Professional development and consistent practice are necessary for teachers to be confident and successful.

- Students are encouraged to learn by doing, taking a constructivist approach. Learning to apply the *Five Key Questions* takes practice over time, much like learning to tie shoes. Through repetition and refinement, the process becomes automatic.

- Meeting state education standards is key, as well as connecting to a school's core curriculum, and CML's *Five Key Questions* of media literacy. For example, Project

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[15] Center for Media Literacy, 2002 (available at http://www.medialit.org/about_cml.html#education)

SMARTArt concentrated on Visual and Performing Arts Standards (VAPA), Language Arts (LA) and English Language Development Standards (ELD) (California, Department of Education, 2001).

- In the national McRel K-12 Language Arts Standards[16] the four traditional strands are expanded from reading, writing, speaking and listening to also include viewing and media.

- In focusing on the deconstruction skills of media literacy, it is not necessary to rely on technology to be successful. Some classrooms are not well-equipped with computers or have little access to broadband internet access. Activities can be scaled in terms of technology.

- Student learning can be demonstrated through an ongoing production of artifacts to show learning; assessments can be made through the use of rubrics, portfolios and other simple instruments like pre-post multiple choice tests.

In addition to instructional issues, how a new media literacy project is organized greatly impacts success. Each project is different, depending upon the focus, scale and the scope of the project involved. But there are some criteria for successful implementation that are common to all. For example:

- *Voluntary Participation*. Teachers who want to contribute to the project make all the difference. Committed teachers, willing to experiment and to share their learning, are essential for success. In a school-wide program, it is key to provide training for new staff members and to make proficiency in teaching media literacy along with core subjects a requirement.

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[16] From Kendall and Marzano, *Content knowledge: A compendium of standards and benchmarks for K-12 education*. Aurora, CO: Mid-continent Research for Education and Learning, 2004. Language Arts standards available at http://www.mcrel.org/compendium/SubjectTopics.asp?SubjectID=7

- *Professional Development*. At the onset of any project or any school year, teachers need time to learn and to practice media literacy concepts and skills. Hopefully, as online tools progress in providing professional development, the time and investment costs will be reduced even as the quality of the teacher training experience is enhanced.

- *Media Literacy Peer Coaching*. Since media literacy instruction often involves a new way to manage and conduct classes, it is very helpful for teachers to have the opportunity for meetings with a media literacy teaching coach. In the case of Project SMARTArt, these sessions were sequentially designed to: a) answer questions,   b) observe the coach in a demonstration lesson,   c) allow the coach to observe a lesson by the teacher,   and d) critique and plan.

- *Content Expert Meetings*. In middle school and high school, teachers have responsibility for imparting knowledge in a particular discipline such as science or language arts, often with colleagues and/or departments devoted to a particular subject area. Having departmental meetings devoted to developing media literacy-related instruction, curriculum and assessment is an excellent way to foster continuing professional development and reflection on current classroom practice.

- *Culminating Projects*. Culminating projects provide teachers and students alike an opportunity to synthesize and share learning, as well as give students an opportunity to construct media or projects and showcase them for parents, peers or other online audiences. In Project SMARTArt, for example, students produced 30-second animation shorts as a culminating project, weaving elements of all four arts disciplines into the construction of a replicable media artifact.

- *Assessment Strategies*. Assessment strategies can include a wide array of tools designed to test students' content mastery and knowledge of media literacy. The key is to understand the different purposes of assessments, how they can be structured, and finally, what to do with the results.   Hopefully, with new technology to support classroom assessment, this task will become easier for teachers and students alike. The interactive and collaborative nature of media technology makes an ideal environment for student-involved assessment, which provides students with the opportunity to strengthen their skills in self-directed and team learning environments.

- *Parent Outreach*. Parent Outreach provides parents with the opportunity to learn about media literacy so that they can reinforce important lessons at home. Since parents have typically been educated in a traditional school environment, they need exposure to and understanding of the learning environment in which their students are active participants.

- *Annual Evaluation Meeting*. There is no substitute for staff reflection on results and experiences along the way. An evaluation meeting, held at least annually for administrators and staff, is a priceless commodity that can yield benefits for organization and instruction alike.

Although there are no formal "credentialing" or scaling systems in place for media literacy education, there are some fundamental tasks that teachers should be able to perform in order to demonstrate their proficiency in delivering instruction, depending upon their instructional responsibilities:

- *Conduct a Close Analysis (Deep Deconstruction)* quickly and efficiently, gearing the Analysis to specific time parameters. In conducting such an exercise, teachers train the students and in turn, students carry this methodology with them to train their peers and

others. Once this methodology takes hold, schools can build on a consistent vocabulary and systematic ways of deconstructing texts, regardless of the subject or type of media used.

- *Construct a short, engaging Activity* that demonstrates both deconstruction and construction (production), and provides a basic assessment tool for the Activity. Activities can take many forms, but a key goal of any activity is to have an "Aha!" moment that promotes student learning and engagement.

- *Design Lesson Plans and Curricula* in a specific subject area, featuring both deconstruction and construction, along with basic assessment tools. Lesson plans consist of a series of activities, and a series of lesson plans comprise a curriculum. Because media literacy calls for applying concepts that are not necessarily sequential, there is a great deal of flexibility in designing lessons and curricula. However, each lesson should incorporate activities which represent the CML Empowerment Spiral: Awareness, Analysis, Reflection and Action. Furthermore, it is useful, in applying the Five Key Questions, to focus on one Key Question per lesson, unless the lesson is an introductory lesson or culminating lesson, so that students learn to "see" the lesson content through the "lens" of a particular Key Question. Although a particular text may remain the same, the focus of the text analysis changes depending upon the Key Question being applied.

- *Integrate media literacy across the curriculum*, reinforcing the basic media literacy methodology throughout the various subject areas and assessing skills. For elementary school teachers, this skill is essential. For middle school and high school teachers, more staff coordination is necessary since they are typically focused more on teaching in their specific discipline rather than intertwining content knowledge with process skills across

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various disciplines. So long as the Five Core Concepts and Five Key Questions are represented in each subject area across the curricula, it's likely that a school curricular program will consciously build the process skills necessary to connect with content knowledge.

However, although each Core Concept may be taught in each grade, it may be useful to emphasize certain Core Concepts at certain grade levels. For example, at Hathaway Brown School, a pre-K-12 school where CML helped implement a media literacy program in 2009, the Daycare-Pre-K teachers focused more on Key Questions for Young Children related to Core Concept # 1, to explore construction and "what is real." Grades 1-3 examined Key Question #2, to explore formats and techniques. Grades 4-6 focused on Key Question #3 to begin understanding the differences in audiences. Grades 7-9 concentrated on Key Question #4, looking at what is included and what is omitted in content, lifestyles, values and points of view. Grades 10-12 looked at Key Question #5, examining media purpose and communications systems at work. As teachers and students become more knowledgeable about using the Key Questions, these "assignments" can be shifted around over time so that eventually, all the various grade levels have emphasized all of the Five Key Questions.

IV.   Media Literacy Should Be Included in Mainstream Instruction

The answers to certain questions in the NOI are a source of long-standing disappointment to us at CML. Section 52: "To what extent is media literacy a required part of school curricula throughout the nation?" (at 21) Section 52: "How are parents and teachers taught media literacy?" (id.). Section 51: "Are there studies of what parents, teachers and children must know

to be sufficiently media literate?" (id.). The answers to these questions are: not at all, they are

not, and not at all. Sadly, despite the best efforts of media literacy scholars and practitioners

over the last forty to fifty years, media literacy instruction has never entered the mainstream of

curricular programming in US educational institutions. Though the discussion in "Programs

Around the World" (Section III *supra*) gives the appearance of plentitude, programs in the

United States are largely concentrated in universities. Only a handful of programs have been

fully implemented in US schools, most notably the *Assignment: Media Literacy* project at the

Maryland State Department of Education and Project SmartArt, coordinated and implemented by

the Los Angeles Unified School District and the Center for Media Literacy. The Center has done

much to raise the visibility of media literacy education in the United States through advocacy

and outreach, through a wide variety of professional development programs and through

curricular implementations at numerous school sites. But without greater exposure, it is highly

unlikely that media literacy instruction will gain currency in K-12 schools nationwide.

The development of an online information portal and/or a social marketing campaign

conducted by the FCC, other government agencies, and/or other partners could be very helpful in

this respect. As we discuss in Section III *supra* (at 24), the CML framework can be used to

create short, engaging activities in which students are led to observations and personal

connections for potential insight. These activities usually focus on a single image or a short

video clip or web page, and often produce an "Aha!" moment for students (part of the

"Awareness" stage of the Empowerment Spiral), after which students are invited to apply one or

more of the Key Questions or Core Concepts to the media text. The advantage of delivering

public information through these activities is that they can clearly demonstrate the educational

value of core media literacy concepts even as they provide good entertainment value for a variety

of audiences.   CML has produced several sample "MediaLit Moments." [17] These already function as an online resource, and can also be readily adapted for a public information campaign.

In general, the FCC should use its regulatory powers to create incentives for the participation of media and communications industries in media literacy initiatives. For example, the Commission could require greater transparency from these industries with regard to the commercial criteria used by internet search engines to display results of searches, and the practice of product placement in television and film. Moreover, these industries should not simply respond by issuing disclaimers or warnings. Media and communications companies are in a unique position to reach out to consumers about media literacy issues, and the FCC should encourage—if not require—industry stakeholders to engage consumers with educational content, and with educational activities for younger consumers.

The Digital Britain initiative may provide the FCC with a model for the drafting of such a regulatory framework.[18] The initiative outlines a broad national strategy for supporting a "digital economy" in the United Kingdom, including modernization of communications infrastructure, development of a strong legal framework to support creative industries, improvement of government use and handling of digital information, and implementation of measures to enable full participation (or "inclusion") of the public in a digital society. Media literacy education falls under the rubric of inclusion, along with actions to support the training and employment of a digital workforce, and programs to help digital "hesitators" make full use of media and communications technologies.

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[17] Available at http://www.consortiumformedialiteracy.org

[18] The Digital Britain site may be accessed at http://interactive.bis.gov.uk/digitalbritain. The Digital Media Literacy Working Group report may be accessed at:
http://www.ofcom.org.uk/advice/media_literacy/media_lit_digital_britain/digitalbritain.pdf

We believe that the media and communications industries in the United States could be a potent, innovative force for educational reform. Currently, Cable in the Classroom is the only industry-sponsored organization (to our knowledge) which emphasizes media literacy in its educational materials. However, the case can be made to industry leaders that their support of media literacy initiatives stimulates the development of a talent pool with a comprehensive set of relevant analytical skills and the capacity to make informed and creative decisions on the job. Moreover, the FCC and other government agencies should promote and support such public-private partnerships because creative industries (from film production to fashion design) are quickly becoming a leading sector of the national economy. In November of last year, the Otis College of Art and Design, in partnership with the Los Angeles County Economic Development Corporation, issued an annual report which estimated that the creative industries of Los Angeles and Orange Counties generated $139 billion in sales/receipts, paid $5.1 billion in state and local taxes, and were responsible for nearly 1 million direct and indirect jobs—one of every six in the region.[19]

In the past, federal agencies have shown interest in funding programs which combine media literacy instruction with health education. A case in point is Beyond Blame, a violence prevention curriculum designed by the Center for Media Literacy and funded by the US Department of Health and Human Services' Centers for Disease Control (CDC).   We recommend that federal agencies, especially the CDC and the National Institutes of Health, increase funding for these activities. Typically, school districts, along with state and local agencies, have the institutional capacity to apply for federal funds and to coordinate programs with a variety of public and private partners, including community-based health projects and

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[19] See *Report on the Creative Economy of the Los Angeles Region*, Otis College of Art and Design and Los Angeles County Economic Development Corporation, 2009 (available at http://www.otis.edu/assets/user/Creative%20Economy%202009%20report(1).pdf)

non-profit youth organizations. Aside from Beyond Blame, CML has been involved in several combined health and media literacy programs receiving federal, state or county funding, on topics ranging from smoking cessation to nutrition, body image and gender. The federal government should also provide incentives for the health industry to become involved in such initiatives, as they, too, have the capacity to administer them in co-operation with other partners.

VERB™ It's what you do is one exemplary combined program. *VERB* was a national, multicultural and social marketing campaign coordinated by the Centers for Disease Control from 2002 to 2006. This social marketing campaign applied commercial marketing strategies to influence the voluntary behavior of target audiences to improve personal and social welfare by increasing and maintaining physical activity among tweens (aged 9-13). The campaign provided clear evidence that a national media campaign with strong social marketing elements can have a demonstrable impact on physical activity nationwide.[20] In addition, students and ordinary citizens were given access to multi-media technology tools, which empowered them to become active participants in the campaign.

Finally, media literacy instruction needs to be fully integrated into the core curricula of US schools, and the Department of Education should take a leading role in the integrative process. At a minimum, the DOE should mandate a basic media literacy course for elementary, middle and high school students. All schools require parents and students to sign off on Acceptable Use Policies (AUP) for students' technology use. However, these AUPs are merely a legal requirement which do little to inspire appropriate behavior or understanding. Today, virtual learning platforms are becoming more common while parents, administrators, teachers and students are still challenged in learning how to effectively participate in online school

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[20] See Cavill and Maibach, *Verb™: Demonstrating a Viable National Option for Promoting Physical Activity Among Our Children. American Journal of Preventative Medicine*, vol. 34, no. 6 (2008), 173-174. doi: 10.1016/j.amepre.2008.03.013.

communities. Yet schools have no curriculum with which to support families, students and staff in how to make the AUP a living, readily comprehensible document. Issues like safety, cyber-bullying, sexting, etc. are all imperative issues to address, as well as the media literacy skills that underpin engagement with virtual media. A mandatory basic course would expose students, teachers and administrators to core media literacy concepts and heighten awareness of important social issues surrounding media use.

As discussed in Section III of these comments *supra* (at 14), the greatest need is for "common core" standards which include a full complement of media and technology literacy standards. To date, no full Pre-K through 12 media literacy standards have been articulated in any state or district within the United States. Without these standards to guide curriculum developers, administrators and practitioners are likely to view media literacy instruction as a time-consuming "add-on" which can be ill-afforded amid the continual struggle to provide adequate instruction in content areas for which there is already a mandate. The process of curricular integration can only begin when common standards are in place, and it will likely take some time after this watershed moment for teachers to really begin mining the potential of the Key Questions and Core Concepts to enhance instruction in their subject areas, their classrooms, and their individual practices.

Though standards are set by individual states, the DOE can also take a leadership role in this area by sponsoring research on assessment of media literacy instruction, on standards articulation, and integration of media literacy standards into core curricula. Moreover, the DOE could sponsor projects for drafting and evaluating these standards. The DOE should also address the problem at the grassroots by establishing grant programs for pilot projects. Media literacy programs have been chronically underfunded, and media literacy curricula not have been

available, utilized, scaled or valued for this reason. The generous funding of such projects may do more to promote media literacy education in the United States than any other course of action which the federal government could take. The curricula, case studies, trained professionals and passionate advocates produced by multiple, successful, large-scale projects would provide a defining contribution to the building of a broad public consensus regarding the need for policy change across the states.

If any of these recommendations seem impractical, the Commission should consider the pace of reform on the other side of the Atlantic. Last year the Commission of the European Communities recommended the inclusion of media literacy in the compulsory education curriculum of the entire European Union. In the United Kingdom, the Office of Communications has had a mandate to promote media literacy since 2005, and Parliament has set an expectation for the end of 2010 that all schools will own and operate integrated learning and management systems which can support a comprehensive suite of learning platform technologies. The British Educational Communications and Technology Agency (Becta) has already issued a set of functional and technical requirements for these virtual learning platforms (VLP's)[21]

In closing, we cannot emphasize strongly enough that, if we are to become a fully literate society, educational reform in the United States must prioritize the inclusion critical thinking and process skills in core curricula. As futurist Alvin Toffler once remarked, "The illiterate of the 21st century will not be those who cannot read and write, but those who cannot learn, unlearn, and relearn."

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[21] See *Learning platform functional requirements.* BECTA, December 2007 (available at http://schools.becta.org.uk/upload-dir/downloads/functional_req_learning_platforms_v1.pdf)

Respectfully submitted,

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Dated: January 21, 2010