



Now What?

Imperatives & Options for “Common Core” Implementation & Governance

October 2010

With the release of the Common Core State Standards in English language arts and math, as well as the current assessment-development efforts tied to those standards, much of the U.S. is on the way toward shared academic expectations and measures for K-12 education—a remarkable development. Yet a thousand “next steps” must be thought through and implemented if these standards and assessments are to get real traction and yield real benefits for American kids, schools and educators in the years ahead.

Will help from the Bill & Melinda Gates Foundation, we at the Thomas B. Fordham Institute have been considering those steps along with a set of thorny issues that will determine the *long-term* viability of this endeavor. What needs to happen in the next five years? A decade hence, who will be in charge of the common standards-and-testing effort? How will these activities be governed? Paid for? And more.

Below you will find **Paul E. Barton’s** response to a dozen perplexing questions on the future of the Common Core initiative. The questions are split into two sections, the first focusing on standards and the second on assessments. Responses from additional education experts, along with Fordham’s own October 2010 synthesis and recommendations (by Chester Finn and Mike Petrilli), *Now What? Imperatives & Options for “Common Core” Implementation & Governance*, can be found online at http://edexcellence.net/index.cfm/news_now-what-imperatives-and-options-for-common-core-implementation-and-governance.

(Questionnaires and responses are from June 2010. Some references may be out-dated.)

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(A full response follows question 12)

Governance of the Common Core State Standards

- 1) Who should oversee the ongoing development and revision of the Common Core State Standards over, say, the next twenty years?
 - Does something new need to be created or can existing organizations or structures handle it?

- What's the argument for/against turning this whole thing over to NAGB to run (in addition to NAEP)?
 - What about letting the ad hoc coalition that got us this far (led by NGA and CCSSO) continue to lead the process?
 - How urgent is this? Could the “Common Core” initiative proceed for a time with *no* governance per se, then reconvene the original partners to take stock and determine next steps?
- 2) If it's a new governing body, how should it be constituted? What should be its governance? Members? Selected by whom? Should it include (for example) governors? State chiefs? Legislators? Superintendents of major districts? Teachers? Subject matter experts? Who else?
- Since most people believe it's important to maintain state ownership/leadership of the CCSSI venture going forward, what are the best ways of ensuring this?
 - Does it need to be a formal entity or could it be a looser confederation or network?
- 3) How, if at all, should *higher education* be involved in the governance of K-12 standards (and assessments)? How about *employers*? Particularly considering that meeting these standards and passing these assessments should signify “college and career readiness”?
- 4) How can the governing body be constituted to increase the likelihood that it will maintain rigor in the face of political push-back? In other words, how to protect the common standards from getting dumbed-down over time? Is there a role here for something like the “validation committee” that participated in the initial CCSSI process?
- 5) What roles, if any, should the governing body of the CCSSI initiative play beyond overseeing the ongoing development and revision of the standards? Should it undertake research to determine their validity? Their effectiveness? The fidelity of state and local implementation? How participating states handle the “additional 15 %”? Should it undertake any implementation activities itself? Developing curriculum, for example? Monitoring curricular alignment with the standards? Designing instructional materials? Developing professional development modules? Others? If the CCSSI governing body doesn't oversee these activities, who should (particularly if any of this is to be done in a “common” way)?
- 6) How should this be paid for going forward? If not by the federal government, then by whom? If by states, how would that work? If by the federal government, what should be the relationship of the government to the common standards' governing body?
- 7) What other comments or suggestions do you have that might be considered for the long-term governance of the common standards?

Governance of the Common Core State Assessments

- 8) What are the governance implications of finding ourselves with more than one set of assessments aligned to the common standards? Will each successful “consortium” simply govern itself over the long haul? What should those governing bodies look like? How, if at all, should they relate to the governing body of the Common Core *standards*?

- 9) What roles should the assessment consortia play, beyond developing and updating the test specifications? Administering the tests over the long run? Ensuring test security? Setting guidelines for participation of special education students and English language learners? Setting “cut scores”? Publishing school-by-school results? Rating schools based on the results? Others? If the assessment consortia don’t oversee these activities, who should (particularly if any of this is to be done in a “common” way)?
- 10) If it turns out that only one assessment consortium wins the “Race to the Test” competition—or that states eventually opt for a single new assessment system—should its governing body be merged with that of the common standards? Why or why not?
- 11) How should the assessments be paid for going forward? If not by the federal government, then by whom? If by states, how would that work? If by the federal government, what should be its relationship to the assessment consortia?
- 12) What other comments or suggestions do you have that might be considered for the governance of the common assessments?

Thinking About Institutionalizing Common Core Standards

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July 8, 2010

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PRELIMINARY COMMENTS

The road to institutionalizing common core standards may be paved with “a million next steps,” but the prime problem, to me, is getting the bandwagon started. It must get traction now; otherwise, we run the risk of not being able to pull it. After institutionalization begins, the challenge will change to keeping the efforts evolving and growing.

What common core standards might look like in 20 years is hard to envision. Twenty years ago, no crystal ball could have revealed and no power center could have determined what the nation’s education arena would be like today. At the time, it would have been hard to find advocates for a federal bureaucracy that would identify individual schools for sanctions and specify what actions should be taken to change them lest they be closed; yet that is done now. So the greatest wisdom needed today is to define the next few steps.

When speaking about the “governance of Common Core State Standards Initiative (CCSSI),” the goal destination will vary, depending on the predominate mind sets about the role and purpose of the common standards under development. My own mind set, coming out of the knowledge and experience base available to me, is this: The common high standards document for each of the grades represents a high to very high target for each school/district/state to *strive toward*—and some states seem to think they are already there. A polar opposite would be a goal of suddenly standardizing instructional content at this single high level, and contemplating enforcement mechanisms to bring this about. Of course, there are many gradations between.

In the US, math and reading levels for the bottom fourth of twelfth graders are no better than the top tenth of fourth graders, and the spread in NAEP scores in the eighth grade is as large as the difference in average scores from the fourth to the twelfth grade. Although a number of countries exceed the US in TIMSS math score *averages*, those nations have a *wider* dispersion of scores from the tenth to the ninetieth percentile in the eighth grade than we do. Unlike gravity, perhaps such variation

can be defied, but that would likely involve a million factors. There are schools, and whole states, where it would be a big step to get the sixth grade CCSSI reached by the eighth grade. The effort should be to do whatever needs to be done to go higher—a “take it to the next level” approach.

GOVERNANCE OF THE COMMON CORE STANDARDS

Who should oversee development and revision? If there are to be standards in subjects other than math and reading/English—this is essential lest we continue to force a narrowing of the curriculum to those two subjects—it will take a continuing effort. Provision must be made to accommodate future changes, if for no other reason than because the math and reading wars are not likely to remain settled. Institutionalization requires an evolutionary process, with the speed determined by the changing tenor of the times, as it was with NAEP.

Getting Started. The place to start is to build on what we have, relying on the structure and organizations that brought us here. *This was a tremendous accomplishment*, by both the organizations as a whole and the high quality leadership from key individuals in those organizations. Whatever other administrative, governmental, organizational, or political theories might postulate, this approach did the job. It adjusted to challenges as they arose, reached out to the professions and the public, and made adjustments followed by more adjustments. So I would continue with the team that got us here and the kind of federal involvement that supported it.

The present coalition could, I hope, develop a plan for carrying on an effort that begins with the participating organizations, their leadership, and institutional support, setting forth what resources are required and suggesting what type of structure should be created. It may be evolutionary, with the staff of the existing organizations continuing their involvement in this “structure,” along with additional and growing staff resources, and with advisory and validation committees. The Department of Education, out of its discretionary funds, could continue its financial support without having control. With the stimulus funds available, I would think this could adequately launch the effort.

The Alternative. Absent a viable plan from the present collaboration for evolving toward an institutional approach to carry the initial groundwork forward, then I think the effort should be to create an exploratory committee to develop an action plan for moving toward institutionalization. NAEP began that way, with substantial foundation funds and some federal funds from the Office of Education, as described below. In the meantime, the existing collaboration would carry on at a level it could sustain. The effort to produce a plan and achieve agreement will require strong leadership, such as Senators Alexander and Tom James provided to the effort that led to the 1988 changes in NAEP.

Work efforts should include getting broad support for the plan. I realize that I am addressing only process and not describing what an end product will look like 20 years ahead. However, a process is necessary to bring all the major players and power centers on board and end with a formulation that can command wide support—not only to get established but to have a long life—in contrast with the start-and-stop experience over the last several decades.

Not NAGB. Mark Musick's paper tells us, I believe, what we need to know to make a judgment. NAEP is one huge success story; its experience is important and relevant. The take-away is that it has succeeded in a federal environment with federal funding and kept its three-legged stool of NAGB, NCES, and contractors from wobbling too much. It has generated sufficient and considerable independence, despite being created and financed by Congress, having its members appointed by the Secretary of Education, being housed in the Department of Education, and having federal employees as staff. Much of its success goes to the culture the participants created that made the system work.

Further, I wholly agree with Mark Musick that institutionalization of the common core standards should not be within NAGB, for the reasons he gives, and more. NAGB is too federal for the effort to institutionalize state-centered common core standards, and it would not be good for NAEP's role as an "independent outside auditor." Placement in NAGB would make it harder to resist the pressures that occur from time to time to use NAEP testing itself for accountability. Also, NAEP develops its own

“frameworks” as a basis for creating an assessment, and there would be pressure to use the common standards for that purpose—again undermining the outside auditor role of NAEP.

However, with regard to the last statement, a growing acceptance of the common standards by the states, actually making them operational, does have implications for NAEP down the road, particularly if we get to a stage of “common use” throughout the country. NAEP’s frameworks, based on effort to find consensus, have changed over time, such as in mathematics, after the NCTM standards came on the scene. As acceptance and use of the common standards evolves, NAEP will find the consensus changing and will want to adapt. Where that will lead 5 to 10 years from now is hard to predict. Some have believed that NAEP should lead in promoting curriculum changes; I have always subscribed to the original principle set out by Ralph Tyler, that NAEP should assess what it is that is being taught. It is not at all clear how much state standards have actually changed the curriculum, as opposed to *ad hoc* efforts to prep for what may be on the test. Nor is it clear that the common standards will result in real curriculum revision.

NAEP’s Early Experience: Relevant to Startup? NAEP became a federal organization in 1988 after times changed. At creation, it was kept as far away as possible from the federal government, while at the same time being supported by federal money. That early history is more relevant to the CCSSI operation, in terms of startup, than is current NAEP.

First conceived by Commissioner of the Office of Education Francis Keppel, NAEP’s development was carried out by two powerful intellects, Ralph Tyler and later, John Tukey, who worked with foundation funds and federal funds from the Office of Education under its general authorization to collect education data. The gestation period was considerable, beginning with two conferences supported with Carnegie Foundation funds in 1964. Next came the Exploratory Committee for the Assessment of Progress in Education (ECAPE), followed by \$496,000 from the Ford Foundation to ECAPE and \$2.3 million from Carnegie in 1965. The first federal money was \$50,000 from the Office of

Education to the University of Minnesota for a series of conferences. But proportions changed, and federal support came to dominate as foundation support phased out. By 1972, federal support peaked at \$6 million. That may not sound like much now, but in the current economy, it would be \$32 million.

When NAEP acquired a statutory base in the early 1970s, the legislative language was contorted to keep the federal government at arms length. The law provided for the federal government to issue an RFP for a grant to a nonprofit organization to operate NAEP. The grant was awarded to the Education Commission of the States, a decision that kept the states very much in the picture. The grantee was required to appoint an Assessment Policy Committee (APC) from categories the legislation specified. Immediately upon the designation of the APC committee members, *all* policy responsibility transferred to them. The top government official, who varied over time, was an Ex Officio member.

The APC was not nearly as involved in shaping NAEP as is NAGB, but the APC had power and used it. It reviewed and approved all major policies. It voted down a request from the National Center of Education Statistics to add a family questionnaire to NAEP. The President of ETS established a Visitors Committee, which included Ralph Tyler, to audit the program. Although ETS did this for all its programs, the APC abolished the Visitors Committee, stating that the APC was in complete charge of NAEP.

When federal money came to NAEP, it was “laundered” to avoid federal policy involvement. The opposition to federal involvement was so strong and the operation so suspect that NAEP’s assessments were to be by *age, not grade*. The ETS proposal in 1983, adopted by the funding agency, changed this to both age and grade, giving rise to the term “gradge.” This was a response to a change in the national mindset after the Nation At Risk Report, a change that enabled federalization of NAEP a few years later in 1988.¹

¹ In assembling this brief history, I was assisted by Emerson Elliot. I also relied on my own involvement in the foundation-supported evaluation of NAEP in the early 1980s, and my roles at various times in the NAEP program. There are several historical sources for tracing NAEP’s development.

Precedents for Federal Aid Without Federal Control. The preceding history makes two points.

One is that there is strong precedent for using federal money for CCSSI without leaving a federal imprint. The second is that from time to time, the mood of the country changes on what the federal role in education should and can be. That will likely be true of CCSSI. The National Education Goals Panel was abolished because the federal government got too involved. In a search for a replacement, even the word “national” was avoided. After being called simply “the entity” for a period, it was given the name “Achieve,” and it operates without federal funds. This latest, and so far, successful push for what has long been called “national standards” went forth under the rubric of “common standards.” But wind currents shift and the ocean breezes of one time can become the ill winds of another. Still, if an organization is set up outside the federal government, it could receive federal support, if the Secretary of Education so arranged it, as occurred in the initial stage of development.

Yes, NAEP had a period when it was not well known and likely had little effect, but the arrangement allowed it to operate freely. The result was that when it became federal in 1988, data were available to publish trends back to 1970. If a way can be found, it would be best to keep federal financing out of the CCSSI operation. To reach scale and have continuity without federal money, however, will be difficult. Similarly, the major foundations are so large and so powerful in using grants to pursue their strong policy agendas that independence, as a practical matter, may not be complete, even without government funding. If institutionalization is to be accepted as a state-run enterprise, we should expect that the states would make some significant financial contribution. They already do that, to some extent, in their financial support for the National Governors’ Association and the National Council of Chief State School Officers.

Other examples besides NAEP are available to demonstrate federal financial support without federal direction. For example, the National Board on Professional Teaching Standards receives federal support, as did the defunct National Education Goals Panel.

Participants in Governing. To structure a “new governing body,” I assume that for the longer run, the existing arrangement will be restructured and the current major partners will want to create a system that removes themselves from routine day-to-day operations. Whatever form that takes, it should be inclusive rather than exclusive in making major decisions and respecting the many stakeholders in the education enterprise.

As for “participation in governance,” higher education’s entrance requirements signal its needs in terms of what qualifies high school graduates for college. These requirements specify both what courses students need to have completed, and the level of performance they need to achieve on college entrance examinations and placement tests. The role of the public is to decide what should constitute a public education, the purposes of which are much broader than tailoring course offerings to the requirements of postsecondary institutions.

It is unfortunate, I believe, that the purpose of high school has come to be defined almost exclusively as preparing students to meet the requirements of college placement tests. (So far, preparing students for the world of work is given only lip service.) We have a democracy to run, and for that, people need a range of basic knowledge, whether they go to college or not. They need to know US history, understand its government, have knowledge of other cultures, be financially literate, and have a basic understanding of such instruments as balloon mortgages and insurance policies. Young people also need a grasp of how to lead a healthy life. And the list goes on.

The idea that there is a single standard, even for being ready for college, is not at all correct. The SAT scores of the middle 50 percent of Freshmen at Harvard range from 700 to 790, compared to a range from 450 to 540 at Ohio State. Among the 12 states on which I have information, the median cutpoint on the COMPASS placement tests for algebra vary from a low of 39 points in Texas to a high of 71 points in Washington. They also vary hugely among colleges within a given state, ranging range from 0 to 66 points. Therefore, I believe a public high school education needs to be well informed about what

college requires, but the public should come entirely to its own judgments about curriculum content and rigor.

With regard to employers, the level of academic achievement their employees need varies, probably even more than it varies for students to pass college placement exams. The claim that both college and work—usually called “careers”—require the same level of academic achievement is not supportable, nor is it supported in the several studies that purport to do so.

This mistaken claim is qualified in different ways by different people and organizations. Sometimes they refer to “getting the good jobs.” Sometimes they refer to qualifying for extensive employer-provided training programs, which would be a very small percentage of jobs that non-college graduates enter. Sometimes they simply state that all high school graduates need the same high level of academic achievement, no matter what their job. But just as there is no single standard required for college readiness, people who have specialized in education-work relationships, and who have carried out extensive examination of what employers demand, do not agree that there is a single high academic standard required for work and college readiness, either.

My own synthesis of what jobs require is outlined in *High School Reform and Work: Facing Labor Market Realities*, a 2006 report from the ETS Policy Information Center. In their extensive work, Richard Murnane and Frank Levy examined the hiring requirements of several companies with high selection standards and that pay good wages with fringe benefits. The authors found that a ninth grade level of reading and mathematics was the threshold for obtaining jobs that pay middle class wages. The extensive work of James Rosenbaum led him to a similar conclusion. Rather than high math and English/reading skills, those authors, as well large surveys of employers, ranked a set of “soft skills” high, and reported that employers decry their frequent absence in young job seekers.

The most recent and comprehensive work is *Are They Really Ready For Work?*, a Conference Board survey of employers published in 2006. Employers ranked “applied skills” and “basic knowledge”

in terms of what is considered “very important.” “Professionalism and work ethic” were first at 80 percent, followed by “team-work/collaboration” at 75 percent, “oral communication” at 70 percent, “ethics/social responsibility” at 63 percent, “English language” at 62 percent, “critical thinking/problem solving” at 58 percent, “information/technology application” at 53 percent, and “written communication” at 53 percent. Skipping down the rankings, “mathematics” ranked fourteenth at 30 percent, and “science” ranked seventeenth at 9 percent.

A number of scholars have studied the preparation needed to meet the needs of the work world, using data ranging from employer surveys to case studies to job analysis. These scholars include Russell Rumberger, James Rosenblum, John Bishop, Gary Hochlander, Peter Capelle, Michael Handel, Jill Castner-Lotto, and James Heckman. I have seen none of their names mentioned in the standards-setting process or on the validation committee.

I don’t say that higher education or employers need to be directly involved in a governance structure for CCSSI, but documented information about what they need and don’t get *should* be involved. Also, the effort should be informed by advisory committees containing representatives from higher education and employers. But these constituencies are not the only ones needed. Public education is more than just being instrumental in preparing people to get well-paying jobs.

Problems with the Single Standard Approach. The first round of common standards, according to people whose judgment I respect, is at a very high level. However, a lot more work and broader thinking is required, I believe, particularly for standards at the high school level. We are provided with standards for fourth grade mathematics, for example, not just elementary school. But for high school, there is only a single set of high standards for attainment rather than a standard for an Algebra II course, for example. Although the standards are called “evidence-based,” an evidence base has not been provided for the proposition of a single readiness standard for college and that this standard is required

for work. This is not a sustainable position, and more work needs to be done down the road toward an institutional base for common standards.

I am a proponent of high standards. For high schools, I am also a proponent of a framework that recognizes multiple pathways to achieving life goals, differences in preparation prior to high school, differences in learning styles, and differences in personal preferences that range from entirely academic to applied settings such as Career and Technical Education.

A strong case exists, it seems to me, for recognizing differences in what college readiness and work readiness requires, acknowledging that there are many overlaps. ACT has two sets of assessments, one for college readiness and one for workplace readiness that takes the form of a battery of assessments called WorkKeys. Not only is the latter set based on *applied* knowledge, but in recognition that there is no single level of readiness for all work, employers using it must go through a process of establishing cutpoints on the assessments that are valid for the particular kind of work for which the test is used.

The Bureau of Labor Statistics (BLS) has maintained an occupational analysis and projections program since World War II that reports the preparation needs of different occupations, and projects this forward ten years. In the most recent analysis, the projections go to 2018 and compare these to actual data for 2008.

Of all occupations in 2018, 29 percent are projected to require an Associate Degree or higher, and another 6 percent require a “postsecondary vocational award.” Minus the preceding 35 percent of occupations, those remaining require work experience in a related field, or on-the-job training, broken down by long term, medium term, or short term. The last category includes more than a third of all jobs. BLS also projects the number of job openings due to growth and replacement needs over the full ten-year period, projecting about 51 million openings. The percentage breakdowns for the job openings closely parallel the ones for the total number of jobs projected for 2018.

These data do not support having a single readiness standard for college and work.

Maintaining Rigor. Assuming rigor is present, how is it to be maintained in the face of political “push-back” that weakens the system? Part of the answer lies in the broad participation and commitment of different sectors of society. Getting as board participation as possible requires keeping advisory committees involved, high quality leadership and commitment from the Secretary of Education, and involvement of governors, chief state school officers, teacher unions, and others. And yes, some kind of “validation committees,” such as those used so far, can be helpful in assuring that there is competent professional review. Of course, keeping support will be related to how realistic the standards are, and how the results play out, such as whether the assessments become aligned with the standards, and whether the accountability systems built from tests and standards create confidence that they measure school and teacher effectiveness and not something else.

The Validity of Accountability Systems: More Than Just “Good” Tests. The last point needs more attention than the set of questions gives it. The questions are very relevant to creating content standards and quality assessments. Although these are essential elements, they relate only to components of an accountability and evaluation system. The assessments that are based on the content standards will measure what students know at a point in time, and they can be reliable and valid for that purpose. However, they are *ingredients* of an accountability/evaluation system, not the entire system.

Much of the confidence, or lack of it, will derive from how the ingredients are used. We have not developed the concept of an evidence-based accountability system that can give us confidence that we have properly identified the relative quality of schools—or teachers—in the enterprise we are embarking on to use student test scores to retain, promote, or reward teachers. We can have high standards and good tests and still make unwise decisions about how to use them. We may have poor standards and inadequate tests now—and there is evidence that we do—but we also poorly use what we have in the accountability systems. For example, we use end-of-year test scores that capture the

knowledge of a lifetime to judge effectiveness of teaching in the eighth grade, for example, and we compare the test scores of *different* children over time to judge the effectiveness of schools at the eighth grade level.

So, to gain acceptance of rigorous content standards and the tests based on them, and to maintain support, it is essential to have assurance of valid accountability systems that are built from test score results.

Monitoring Adoption and Conformance. My suggestion is that the CCSSI entity develop and adopt model standards and assessments for the states to emulate, rather than develop some system of enforcement, which is hard to visualize in operation. The CCSSI could push back efforts that weaken standards by actively shining the bright light of public information on standards that remain weak or get weaker over time. Rather than an “enforcement” mechanism, I suggest periodic and very public reports of how given state standards compare with the model. When states claim sufficient comparability—and they do have leeway in the 85 percent rule—CCSSI would decide whether the standards do or do not have sufficient comparability, and if not, what needs to be changed to make them comparable. These results would become a public matter rather than just a private service to the state.

I also see this as CCSSI’s role in assessments based on the standards. A model would be created that embodies high quality assessment approaches of the kind being talked about, and that goes far beyond measuring skill in choosing among a set of possible answers, as in multiple choice assessments. Experience is available with many open-ended approaches that require essays, for example, or actual demonstrations. An unknown factor at present is how many “models” will come out of the grants made to develop assessments from the federal stimulus funds.

NAEP has pioneered in assessment development; its early science assessment utilized laboratory equipment. The nation went through at least a mini-phase of “performance assessment” and “authentic assessment” in the 1980s. Although the model would use the best approaches to measuring

knowledge and skills, and application of both, it would have to be realistic in terms of cost. Although perhaps not a quantum leap in costs, there would have to be very significant increases, and there would be ups and downs in state decisions on testing investment over time. For example, one of the commissioned papers documents how Kentucky, a state that has made many advances, has recently eliminated the more costly features of its assessment system.

Once CCSSI has developed a model, the degree of state adoption or comparability would be tracked. The effort would be to put states with cheap tests on the defensive. There is, of course, the question of whether there will be continuing financial help to the states for good assessments. This, along with other issues about assessment, is still unknown.

Ongoing Development and Revision. The institutional CCSSI entity to be created would be the place to handle the necessary revision of standards, and to continue to develop standards in other key subjects. To stop with what we have in place would continue the effect of narrowing the curriculum—the unintended result of keeping the heat solely on math and reading/English. As standards are updated through a process of consensus and validation, their adoption would be traced and publicized. The 15 percent variation permitted appears to be an option to be decided by the state, but there is no reason why the 15 percent could not be examined for quality and the substitute standards publicly reported.

Curriculum—Front and Center. The matter of curriculum and alignment with the standards and assessments is huge. *It has been the weak, or missing, link in efforts during the test-based accountability phase of reform.*

Standards-Based Reform started in the mid 1980s with the reform of curriculum. Begun with the standards produced by the National Council of Teachers of Mathematics, follow-up was about adoption of changes in the curriculum and professional development to teach it. Attacks from interest groups were followed by revisions, and we departed from curriculum reform efforts when Standard-Based

Reform was hijacked by Test-Based Accountability. I do not say that much curriculum reform actually occurred—I don't know how much did or did not—but this seemed to be the objective.

The matter of curriculum, instructional materials, and teacher development to teach revised curriculum is elusive; it is difficult to find points of entry and leverage. This should be separated out for focus, whether by an independent operation or as part of the responsibility of a new standards entity. It is particularly elusive for high schools, for the standards do not address particular courses but a culmination of what students should know before they graduate. This is not a sufficient basis to guide curriculum development and revision in specific nine-month courses.

As near as I can tell, for one who is not an education historian, the public school system as a whole never had or built the responsibility for curriculum development. One way or another, private companies do this, as they do for testing. Textbooks contain more than the subject matter covered in a year. Teacher colleges do not prepare teachers with a curriculum and understanding of instructional materials needed to deliver it, nor prepare them for the tailoring of teacher-designed tests to go with the curriculum. There is little or no process with intervention points to get a curriculum aligned with content standards.

Here is how David Cohen puts it in his new book, *The Ordeal of Inequality: Did Federal Regulation Fix the Schools?* “Even if we assume that new standards would validly express the aims of instruction and new tests would validly measure those aims, neither standards nor tests are particularly salient to teaching and learning; standards can specify the topics to be covered, but curricula set out the material and academic tasks that make coverage possible in practice. In a reasonable world, such curricula would both represent the academic content for which standards call and be usable for teaching and learning. Yet few states and localities had any capability for curriculum development, and IASA [the 1994 amendments to the Elementary and Secondary Education Act] made no provision to build it.”

A step that would at least help in facilitating curriculum development was in the goal of having fewer standards. James Popham, while not having made comparison of the new standards with those of all the states, has this to say from what he has seen thus far: "While the original talk was that they would be fewer, clearer, and higher, they missed the fewer part by a mile."²

A big issue is how to get curriculum change and development, guided by good content standards, and all of them aligned so that the assessment matches the delivered curriculum. Until this happens, the common standards movement will not accomplish its intended objectives, and teachers will continue to marshal what intelligence they can gather to teach what they think will be on the test. The system we have in place practically requires this, when the test is much broader than what is taught, or can be taught, in nine months, and the curriculum has not been developed to match the standards. CCSSI will bring a radical change in the public school system, and we will have to do more than simply assign this new entity responsibility for developing some instructional materials.

My own conclusion is an uncomfortable and perhaps unwelcome one, for it goes beyond the current common standards movement. I think we need to move toward an approach that offers content for nine-month courses, coupled with assessments based on their content, and based on the AP, IB, or Achieve Algebra II model. (The AP model offers a syllabus that guides content without specifying specific textbooks, so it is not standardization in that sense.)

I am suggesting a package approach that will include formative and diagnostic assessments based on a syllabus, professional development, and incorporation into instruction in schools of education as part of preparation for teaching, and possibly for teacher certification. If school systems do not develop their own materials, suppliers—whether public or private—will have to match the syllabus for the course. The common standards will be a starting point for developing a syllabus, but the help will be limited if the content standards are too broad.

² Personal correspondence with the author.

One can imagine curriculum development coming from a variety of sources. A promising example, I think, is the recent contract signed between Pearson Education and the Montgomery County Public School System in Maryland. Pearson will give the school system \$2.25 million for development of an elementary school curriculum, and Pearson will copyright and own it. According to the *Washington Post*, June 8, 2010, “Montgomery County Schools [Maryland] could soon become a brand sold around the country. Development will include the tests that will inform instruction.” If the guide used to develop curriculum is the common standards, this will complete the circle. The question is whether ways can be found to spur other such developments. Perhaps there can be a hook-up between a state, a publishing company, and a testing company? Perhaps a teachers’ college could be involved to provide the basis for preparing teachers? The question is whether federal funds can be used for this purpose, as they are for standards and assessments.

Note that, although the correct order is first to develop a course and a curriculum, followed by an assessment based on it, application specifications for “Race to the Top Assessment Program Application for New Grants” turn the order around. Perhaps this is based on a belief that this is the only way the federal government can get involved. Whatever the reason, the premise seems to be that a test can drive the development of curriculum, and that working backward from a test is a constructive way to create a curriculum. This is a completely undisguised test-driven approach to education.

A test is a *sampling* from a course of instruction that reveals what a student has learned from that course. The test is the cart hitched to the horse; the cart does not pull the horse. This is about the same as saying that we should have developed a common assessment first, and from the assessment, then derived common standards.

Although I do not see a role for NAGB/NAEP in the administration of the common standards initiative, I do see a role for it promoting a more rigorous curriculum. We know that students have been taking more courses with more advanced titles, but we are seeing no improvement in twelfth grade

NAEP scores. Transcript studies of high school courses are available, but they report only the course titles. NAEP has a fairly long set of questions that ask teachers about aspects of how they teach. A next step would be to get information from the teachers/schools on the content of the courses they teach. When I testified before the Commission on Twelfth Grade NAEP, I recommended that NAEP develop a set of questions, or a checklist, that would reveal the content of what the course covered, so that a number could be assigned on a scale ranging from, for example, Algebra 0.1 to 1.0. The measure might be a little crude, but it could lead to more efforts to monitor course content, and to efforts to strengthen curriculum when weak curriculum content is identified.

GOVERNANCE OF COMMON CORE STATE ASSESSMENT

I am not sure how to think of a role for some central “governing” body. If states join to create a common assessment, they will agree on what is in the assessment and will award a contract for its development—assuming that they hold to the current pattern of contracting with private companies. Different ways are available for doing this, of course. From the commissioned papers, we see that four New England states do some things jointly and do other things separately but with identical state contracts. It seems that as more states get involved, the more complex it will be to maintain state identity. Perhaps there could be a consortium with one test, one contract, and one administrator? Perhaps the consortium would be large enough to create its own testing capability? It is hard to anticipate how such joint effort will play out in the current maze of possible contractual arrangements available for public/private mixtures.

If there is one consortium and one assessment, I imagine it could be under the same institutional head as are the common standards. If there are a variety of arrangements, however, I would think that each group of states—or single states, if they have not entered a consortium—would create and administer their own assessments, likely under contractual arrangements. To me, it is best to think of this new CCSSI organization as having a range of responsibilities. It could create model content

standards in an increasing number of subjects, validate them, sign as many states as possible to use them, conduct periodic surveys to see how each state's content standards compare with the common standard, and report to the public. It also could do the same for assessment.

But given that states can be "in the fold" and still have leeway to vary from 15 percent of the common standards, it appears that the process will be more complex than described above. This means that content standards, and therefore assessments, will vary considerably as states use the opportunity for variation to satisfy pressures for retaining some existing state content or some state identity as a means of "selling" a sign-on to the common assessments. Some organization will have to determine and certify that the state has stayed—and is staying—within the 85 percent requirement, and that would seem to be a role for the new common standards entity, at least eventually. I assume the Department of Education, through its review and approval of applications for the stimulus funds, will have this role in the immediate future, but some of the complexity of the various requirements has surpassed my knowledge base.

Setting "Cutpoints." A wholly new dimension is introduced by the question about "setting cutpoints," because this does not address just good assessments and content standards, but good and valid accountability systems, as well—and ones that likely have sanctions attached, either by the states themselves or through some re-formulation of the No Child Left Behind Act.

Setting cutpoints is neither a content nor assessment standards-creating exercise. Within the world of cutpoint methodologies, validation procedures, and program evaluation, different disciplines come into play. How is an empirical measure created and used to identify the relative effectiveness of schools, and increasingly, of individual teachers? How are these measures validated to learn whether they actually identify effectiveness? Beyond that, how is an absolute standard of effectiveness identified that must be reached to stay beyond the reach of sanctions?

These questions introduce a wholly separate dimension that does not draw on the expertise of content standards-setting or assessment development. Not seeing this separation leads to evaluations that either are clearly not valid, or the validity of which is unknown.

The matter of what to do about cutpoints should be dealt with through evaluation designs, not through standards-setting processes. Work on an evaluation design based on research and evidence should be commissioned; this also is needed for the next round of amendments to the Elementary and Secondary Education Act. After being disciplined in the creation of standards based on research and evidence, it would be a pity if the products used for evaluation were not based on research and evidence.*

If high content standards and high quality assessments are adopted while still in the era of No Child Left Behind, they are likely to be used in the sanctions system now in place. Such a system does not pass the test of validity for judging school or teacher effectiveness, and I would not lend any credibility to it in the common standards and assessment effort underway. Such a school evaluation aspect would remain as flawed after adoption of the common standards as before. However, we would have good components, and the assessments would be better measures of what students know and can do relative to good standards of what they *should* know and be able to do, even if the curriculum the students studied in the classroom did not match either those standards or the delivered curriculum. In such a case, the problems of curriculum adjustment and development, and the proper use of good assessments in a sanctions-based evaluation system, would still be present and not addressed.

In summary, if an accountability systems development and validation service is to be a part of a new standards entity, it would have to be much different in knowledge requirements. First, the

* The difference between the idea of setting cutpoints on the assessments developed for use in the schools and the use of cutpoints in NAEP is very important. NAEP is designed as an indicator of the well being of education in the nation. NAEP is **not** used for school or teacher accountability and does **not** make statements about the causes of score changes from one assessment to another, although there is much speculation and some research effort outside of NAEP to do so.

difference between evaluation methodologies and standards/test-making methodologies would need to be recognized, and a project launched to arrive at evaluation methodologies that would be tested and brought on line for adoption. This is needed *before* a sanctions system is locked into law. That could be done by a group commissioned by the National Research Council or by another group of comparable scientific standing.

The Money. As Jerry Maguire famously exclaimed, “Show me the money!” For the work of the CCSSI entity in creating model assessments and surveying state practices to keep track of degrees of congruity, the money will “show” best if it comes from a variety of contributors, including the states, foundations, and the federal government under arrangements that keep the federal government out of any authority in the common standards enterprise.

If the new CCSSI entity confines itself to producing models and tracking state use of them, I assume that states will continue to pay for their own assessments, regardless of the kind of coalitions created. Presumably, the more the states collaborate on assessment development, the more state costs will go down, and the more they produce better assessments that go beyond multiple-choice questions, the more costs will go up.

The achievement of cost savings through collaboration that will finance better assessments will be a good selling point for collaboration. However, the balance is hard to estimate. If the federal government participates in assessment costs incurred by a consortium or consortiums created through the award of stimulus funds, there will be a set of federal requirements states must meet to qualify for the funds—and these can be anything the states are willing to meet to get the money. With the 15 percent leeway allowed, I assume it still would be appropriate to keep track of how close state assessments come to meeting the model. I am not privy to the details of the requirements for these funding opportunities, however, and it remains to be seen how these look in relationship to the requirements in the new amendments to the Elementary and Secondary Education Act.

Additionally, we should begin to think of more than summative assessments. The work of the CCSSI entity, and any consortium formed to get federal stimulus funds, should consider diagnostic and formative assessments related to the common standards. Down the road, if these assessments are to be useful to instruction, they must be synchronized with the curriculum delivered in the classroom.

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