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 **David T. Conley**'s responses (in red) 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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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?

This undertaking needs a home and a staff dedicated to its continuation and development. Keep in mind that the Standards are far from done. The ELA and math versions have not achieved much more than version 1.0 status at this point. Science at a minimum remains (although efforts are underway by other groups in this arena), and it is not too far fetched to expect other subject areas to strive toward having national standards (although history will probably be last).

In my estimation ownership separate from NAEP/NAGB is necessary because the focus should remain on the standards themselves and on processes to update and adjust them periodically. Any change in standards is difficult, but when the changes have implications for assessments, this creates an even greater tension if the organization also controls the assessment. There will be a natural tendency, if the standards and assessment staffs are not kept independent of one another, to try to harmonize changes in ways that result in the least upheaval to the system as a whole. I think this is not a good thing at a time when the knowledge and skill necessary for life success may continue to evolve rapidly.

For example, the ability to construct a high quality research paper and all the steps that go with it represent a set of skills that are valuable in a variety of settings. However, current assessments have difficulty capturing information about such a task. Does that mean that the standards should never consider include student knowledge utilization-type of statements? Or in mathematics, data analysis is clearly more important and relevant to more students than calculus. While mathematicians may not find data analysis terribly interesting, the population as a whole will need dramatically improved skills in this area.

The group charged with ownership of the standards must be willing to make changes that are not popular or easy and that result in a cascading set of alternations to curriculum, instructional materials, and assessments. I don't see NAGB as a place that will facilitate this type of flexibility or entertain potentially significant changes to the Standards on a regular basis. On the other hand, I can't think of many organizations that don't quickly become conservative, in the sense of conserving their current state of being and assumptions, so any new organization will have to guard against quickly defining and then defending the status quo relative to the Standards.

So, perhaps there is no simple organizational structure that will solve this problem, and the need is to consider how input is gathered for standards reviews and then synthesized into recommendations.

Regarding the other points, NGA and CCSSO have fundamentally different missions and charges. While the organizations facilitate a great deal of sharing, they also serve to represent their members' interests relative to the federal government. This does not seem like a promising starting point. Furthermore, chief state school officers are a varied lot, including those elected in statewide elections, those appointed by state education boards, and those appointed by governors (or with gubernatorial consent). Given that state education boards are often (but not always) appointed by governors as well, it seems unlikely that state chiefs are sufficiently independent of their governors in most cases to represent a viable counter-constituency to the governors. Turning all of this over to the governors seems equally problematic, given the need of governors to place their imprint on all significant policy

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initiatives. Furthermore, it would seem more likely for governors to be withdrawing regularly for any body of this nature if they disagreed with some particular policy (of if they thought doing so might benefit them politically). It's hard to see how these two organizations would bring much value added on an on-going basis, although they are to be commended for their roles to date.

The Standards are politically vulnerable right now and will be until they survive at least one change of administration at the federal level and changes of administrations in all participating states. They need a strong advocate and defender who is not invested in the specific content of the Standards or concerned about the political benefits or drawbacks of defending the Standards. This is a difficult combination to achieve, but I do think a coalition of education labs and university research centers offers the most hope for a home for the Standards that is sufficiently arms-length from the rough-and-tumble of the political arena and the attacks the Standards are surely to endure. This type of joint ownership of a significant national project or priority has been undertaken previously by consortia of groups of the type delineated previously. However, it's important to note that such a "home" would not solve the governance problem.

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?

I prefer a model in which states can nominate members to a governing board and then each state gets one vote for each member. Some positions would require supermajorities; others would be majority only. The goal would be for the governing board to consist of as many members who were broadly accepted by state as being credible and not ideologically driven. The supermajority requirements would help at least some of the governing board members to vote their consciences with less concern about the political ramifications. Proportional voting would quickly lead to a subset of states dominating the policy decisions, which does not appear to offer any benefit. Decisions that are broadly acceptable across a range of states and political contexts seem more desirable at this point than decisions made by states with large populations.

Any governing board needs to be supported by a strong technical staff that is capable of organizing and managing a very thorough and sophisticated process of standards review that leads to recommendations that go before the governing board on a regular basis. Here, again, some sort of consortium of higher education research centers and educational labs might constitute the best structure for gathering information on a regular basis from teachers, parents, content organizations, the business community, postsecondary education, and other groups about the strengths and weaknesses of the Standards and specific suggestions for revisions, additions, and deletions.

Careful attention needs to be paid to how input is gathered to inform regular updating of the standards as well. Here is a place where many organizations, including state education departments, can play a key and very active role, which helps strengthen institutional ownership of the Standards. Input should be gathered on an ongoing and periodic basis both, with a combination of commissioned studies and broad public input. This will require a staff with strong organizational and technical skills who can work in

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partnership with a range of contractors who would collect and analyze input through a convergent consensus type of framework to identify dominant themes, recommendations, and concerns.

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"?

Herein lies a great irony, that this question should be asked at all and phrased in the fashion it is, at least as it relates to higher education's involvement. Historically, higher education had been an important partner for establishing educational standards and assessments as well as the expectations for the high school curriculum more generally. For better or worse, we need one education system, not two, at a time when an ever-increasing proportion of students is going on to postsecondary learning. That we have become so disconnected across educational systems is yet another indication of how broken the current model of educational governance has become.

Given that students are "voting with their feet" by continuing to enroll in postsecondary education in ever-increasing numbers and that the standards themselves are call the "College and Career Ready Standards" at the exit level, it would seem reasonable perhaps even imperative to have postsecondary education deeply involved and engaged, if for no other reason than to increase their sense of ownership of the Standards and the accompanying assessments. How long will the Common Core State Standards survive if the postsecondary community in the US simply ignores them or actively attacks them?

It is important, however, that postsecondary involvement not be dominated by adminstrators, system heads, or admissions officers. These are not the right people to have at the table. An increasing amount of effort and activity is being focused on the success of incoming students, and higher education representation needs to come from this stratum, people who teach and work with entry-level students, not necessarily just the faculty who are well known in a particular subject area. The academics who are deeply engaged helping students to be successful as they make the transition to entry-level college courses will have a lot to offer in this process.

I'm not as convinced that employers need to represented as employers as much as the process requires that a lot of information about career readiness, as opposed to job training, be factored in systematically. The Common Core State Standards should not be about job training, which, as it applies to a high school graduate, requires a pretty basic level of education, lower than the Standards. The Standards should be about preparing students to pursue career pathways, almost all of which require some education or training beyond high school or will require formal training or studies at some point in order for individual advancement to be possible.

High quality data derived from databases such as O*NET, the Department of Labor, and employer surveys should yield accurate, detailed, current information. Some representatives with strong understanding of workplace needs would certainly be a positive addition, but formal representation of employers per se does not seem to me to be absolutely necessary. It may be a political necessity, however, if for no other reason than to establish the transparency of the standards as being broadly applicable and to ensure that the standards are designed in a fashion that is comprehensible to the work world, not necessarily directly derived from job training needs.

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?

Part of the answer is via the use of extensive research and analysis to ascertain the real achievement levels of students on the Common Assessment and to track those real achievement levels over time. Having concrete benchmarks of performance against which student learning can be consistently measured and that can be understood by the public would help a great deal in maintaining challenge level. What kinds of tasks can students do? Are they improving on tasks associated with success in postsecondary education, the workplace, and society at large? Are these the kinds of things that the public at large believes are important for students to be able to do? At least some amount of benchmarking of this type is crucial to holding one's ground and demonstrating comparable challenge and achievement, particularly when any technical changes have to be made to the standards or assessments (recall the "recentering" of the SAT and the hubbub that ensued). We need to be able to adjust our standards and assessments, both their content and technical characteristics, while still guaranteeing consistency of quality to all constituents.

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)?

The standards need a strong technical support component to accomplish much of what is listed above. That technical support should probably stand separate from the CCSSI governance board, or at least at arms-length. The NAGB model is informative here. The board sets a series of priorities and approves RFPs for the fulfillment of projects designed to do the types of things listed above. Federal funding for many of these pieces would seem reasonable, given that such funding could be on a one-time basis. States and state consortia could also commission aspects of this, such as selected curriculum materials, as could agencies such as the National Science Foundation. Here is a place where foundations could legitimately partner with the board to fund specific types of projects and development activities.

Regarding the larger question of whether these types of things should occur, the answer seems to be a resounding "yes." One of the potential advantages of common standards will be the ability to figure out what's necessary and what works, to improve the Standards over time, and to develop targeted resources that help teachers teach them and that address particular vexing topics and challenging student populations. Research studies are absolute essential to answering questions such as whether these are the right standards in the right sequence and whether they are achieving the goals established for them.

Allowing many different groups to compete to provide these services is consistent with the decentralized US governance model and should lead over time to organizations with high degrees of focus and specialization in relation to the Common Core State Standards. Few organizations currently have a national charge for their work (content area organizations are exceptions, but they can't really take advantage of this charge to implement their recommendations nationally under the current model). Creating the potential for organizations to have a more national impact should lead to more and

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higher quality groups focused on all of the topics listed above. A board would then need to let RFPs and select a broad range of service providers.

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?

One idea being tossed around is to license the standards to commercial interests. What nobody seems to be factoring into that equation is that the licensing costs will have to be passed along to end users, namely school districts within states, but it's one way to camouflage the cost and not associate the standards with taxpayer money. Only in the US would we be having this type of discussion. Many countries have governmental agencies that focus as much on curriculum as on standards and assessments and have reasonably resilient firewalls that make it more difficult for the political party in power to change the assessments and curriculum dramatically without considerable political fallout and social reaction.

Whoever pays is going to have significant influence, even if it's done on a license basis. Large companies that ended up holding licenses will have a vested interest in not having the standards change much and in having them take a shape and form that benefits their way of doing business. You could expect all license holders to form a professional association charged with representing license holder interests in various arenas where the standards can be influenced.

Spreading the costs among the states, with the federal government picking up the lion's share seems on the surface to be a feasible solution, but the problem then is that the departure of any member from the coalition could conceivably cripple the entire undertaking because most organizations would not be able to withstand the loss of the revenue that any one or two members provided without it having some significant effect on operations. Even a 5%-10% drop in revenue if a couple of states departed would be significant if the consortium could not make up the revenue by raising rates to the remaining members.

It seems at the least that states should be expected or required to make long-term commitments to participation in the consortium and use of the assessment, something on the order of ten years, to avoid precipitous departures influenced by changes of administration. Otherwise, states could be threatening to leave on a regular basis to get changes made to benefit their particular needs and priorities.

So long as state participation is voluntary, it is perhaps not problematic from an operational perspective to have the federal government provide the bulk of the funding, with some token state contributions and the ability of states to purchase additional specific services related to the standards at an additional charge. These services could go above and beyond what is offered by the consortium and would provide opportunities for third-party providers to offer augmented analyses, linkages to curriculum, and even supplemental assessments, and to do so through the consortium instead of marketing to each individual state.

7) What other comments or suggestions do you have that might be considered for the long-term governance of the common standards?

I think the goal of any governance structure should be first and foremost to promote the credibility and acceptance of the standards with the public at large. The governance group should be visible and clearly above politics and partisanship as its distinguishing feature. The hosting organization should not develop

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a vested interest in maintaining the standards in any particular form and should be structured in a way that causes it to be open to radical reconceptions of the the standards along with incremental revisions. This is difficult to achieve because essentially all organizations develop strong bureaucratic momentum over time to reproduce familiar forms and formats. Perhaps having the home of the standards rotate on a five-year basis via a competition might be better and also more peculiarly American than simply parking them somewhere and letting them become owned by one organization that becomes more and more familiar with a particular version of the standards and therefore more reluctant over time to entertain significant revisions or changes.

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*?

Having more than one set of "common" assessments is a contradiction in terms, obviously. We can expect one of two resolutions. Given the significant investments that companies will make in these two systems, we can expect each to diverge their models just enough to resist any calls to merge them. We will end up in another SAT/ACT world with two instruments that do roughly the same thing in roughly the same fashion, but with strong assertions about the differences between the two. This is not in and of itself bad if the two spur each other to new and better methods and if states can change between the two with relative ease.

But this is not likely. Each will have a vested interest in making it difficult for states to leave one and join the other unless some form of cooperation is enforced. Given that the funding is coming from the US Department of Education, the USED should embrace a principle of full interoperability between the two systems (I believe this is already in the NIA), if it in fact funds two systems. I am sure this entails numerous technical issues and problems, but the principle needs to be established immediately and as a condition of funding.

I am particularly worried about the fate of the many smaller "boutique" assessment companies that have arisen during the past decade in particular to work with states on NCLB requirements. These centers and companies are more innovative and adaptive and in many cases committed to more aggressive research and development programs than are many of the much larger vendors, who are likely to be the principal beneficiaries of this competition. If we are not careful, we will eliminate most of the capacity in the country to develop assessments and be left with whatever the two consortia wish to enforce as best practice.

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)?

I think it's fairly amazing that this many states have been able to agree on so many substantive issues related to a complex assessment system this quickly. While that consensus may not hold, I do think that

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as a general organizing principle, state decision making should be as high level as possible, focusing on the general operating parameters for the assessment system, such as what kinds of tests in general designed to be able to do what kinds of things in general. State bureaucracies as a general rule are not particularly good at many of the tasks listed above (they certainly can do many of these things; they're just not the best bodies to be charged with primary responsibility, in many cases). We are having to design new assessment systems at least in part because states have had a difficult time with some of these tasks.

Here may be a place to help salvage at least parts of the assessment industry in the US. The last thing we want is for one testing company to come to dominate the landscape to the extent that all innovation and experimentation has to go through that company. Can we find ways that various testing organizations can handle the technical aspects of the types of questions listed above and then report their recommendations back to the consortium governing board or executive board, which would either accept the recommendations or send them back for additional work.

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?

I'm thinking that it will turn out with two awards, which will be challenging. Once each gets institutionalized in multiple states, it will be likely to be difficult to dislodge one or the other.

However, assuming only one wins, I think it would be preferable for some aspects, but not all, to be managed by one board. The primary piece that needs to be fully coordinated is the domain coverage by the assessment. The Standards have many lofty goals that are going to be ignored if the assessment system doesn't continue to evolve and become more capable of gauging complex learnings in more authentic contexts. Conversely, it would be a problem if the Standards came over time to be defined by what current testing technologies could measure.

I'm not positive one board is the answer, but if there were more than one, I would want to see some process or mechanism that required the boards to meet jointly or otherwise develop a common agenda when it came to the alignment between standards and assessments in the near term and the longer-term vision for how the standards and assessments should separately and jointly be evolving over time.

If there were one board, it would be important to ensure the board was devoting sufficient time to the complexities of managing both a standards and assessment system. This is my main concern, that one board would have a hard time keeping track of both systems and developing sufficient expertise to manage policy for both. Having some tension between two boards would not automatically be the worst thing in the world if it resulted in examination of problems and issues that might not come to the fore if one board managed both systems.

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?

I'm not sure I have much to offer on this point. The main consideration is that cost not be the primary driver of this system, if at all possible. This may seem idealistic, but the stakes are too high not to invest reasonable sums in a comprehensive measurement system that utilizes a variety of assessment and

scoring types. Whatever the system ends up costing, it will only be a very small fraction of the total amount spent on education k-12 in the country. This is an opportunity to make an investment that will yield a very large return relative to cost.

If price becomes the sole driver, all item types and scoring will converge on a lowest-common-denominator model, which generally means machine-scored multiple-choice test items. Once again, if we wipe out the innovative assessment providers and innovators because there is no willingness to invest in R&D for new methods, it seems unlikely any breakthrough methods will be in the offing for some time because the entity that holds the contract for the test will have absolutely no motivation to explore any method that might cost more. Other countries have learned that it's sometimes wise to invest more time and energy in careful assessment at key points.

However we pay for these assessments, we need to be thinking about establishing a separate R&D fund to help keep the testing technologies moving forward. State tests accomplish some of this currently, in a limited fashion. At this point, the federal government seems like the only viable candidate to establish such a fund.

12) What other comments or suggestions do you have that might be considered for the governance of the common assessments?