



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.

With 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 **Neal McCluskey**’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?

First things first: As long as the standards are imposed at any level – school, district, state, or federal – they will both fail to address the needs of all our very diverse kids, and will be subject to special-interest political pressure to dumb them down. That’s why, ultimately, the only way to have the standards work well is to have full educational freedom for parents and educators, and to have the CCSSI standards compete against other standards and models. Then the education system would be able to produce standards and models that meet the needs of all kids; the Common Core standards would be well-insulated from dumbing down because they would not be governmentally imposed; and there would be powerful accountability because the special interests that currently use their superior political might to get weak accountability would have to respond to customers, a situation in which they would have no unfair advantage.

Of course, we are not likely to have widespread educational freedom in the next five or ten years. So what are the best governance scenarios in the current system, and who do they suggest should be in charge of the standards?

If the standards are to be at all insulated from political pressures to gut them they need first and foremost to be totally disconnected from federal funding and governance, in stark contrast to their Race to the Top-spurred creation. Keep them connected to Washington and the same political forces that have repeatedly hobbled state-level standards and accountability will gut them through federal politics. That means that whatever entity takes on development and revision of the standards must absolutely *not* be federal.

Of course, if substantive rewards or sanctions for states, districts, schools, or students are connected to meeting the standards it is inevitable that political pressure will be brought to bear on them. In that case control by NAGB wouldn’t help: That no rewards or sanctions are attached to NAEP is the major reason NAGB has remained fairly well insulated from politics. Connect dollars or dunce caps to the standards and even if a currently independent NAGB were to assume control over them you would not maintain the independence that currently makes NAGB valuable.

That said, ultimately *no* governance structure will adequately protect the standards’ rigor as long as any government money or other government rewards or punishments are connected to them. Fully disconnect government rewards and punishments, though, and a truly private entity – say, a Thomas B. Fordham Institute – could take hold of the standards and provide them as an exemplar for all schools, districts, or states. (Such a system would fit, by the way, in Patrick McGuinn’s “Seal of Approval” model.) Groups like CCSSO or NGA should not remain in control of the standards because the political positions of their members could incentivize dumbing the standards down, especially if performance as measured by the standards is low.

- 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?

Given the reality of top-down government control of education, the best organization for governing – I'll say managing – the new standards is one that is truly private. Otherwise, political "stake holders" such as teachers unions will have to be included, and as we've seen repeatedly they will attempt to shape the standards for their own ends, even if those ends are not in the best interest of students.

From a logical standpoint, the private entity in charge should convene subject-matter experts as well as the college educators who will be looking to enroll students who are supposed to be brought to the standards. Teachers – but not union reps – should also be included because they will have to execute transmission of the standards. Groups of parents should also be consulted to gauge what they want from the standards. Political actors such as governors, state chiefs, and legislators should be excluded, lest political goals replace educational ones.

Having a fully private governing body, importantly, will not completely insulate the standards from political pressure unless the entire system is rooted in parental choice and truly private educators. It will, however, enable the standards-setters to more effectively fight politically motivated attempts to make changes, and could leave the standards well insulated if adoption of the standards, down to the school level, were to be truly voluntary.

- 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"?

To craft and maintain truly "college- and career-ready" standards higher education and employers should be involved in governing standards, if by that we mean determining what goes into standards, not how they are imposed on schools, states, and districts. In other words, college educators and employers should probably have some power in a standards-writing entity but they should not have formal abilities to reward or punish schools or districts for mastery of the standards.

That said, it is critical to remember that there is huge variety in the focus of individual colleges and universities, and even greater variety in the needs of "employers" who, after all, would include anyone who ever signs a paycheck. Quite simply, no single set of standards could possibly address the needs of such diverse entities, and a sufficient number of higher educators or employers could never be consulted to adequately represent all of these innumerable groups. This, again, makes clear why the standards will only work optimally in a truly free-market education system, which is the only system that can handle diversity well.

- 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?

The only way to keep the standards from being dumbed-down over time – or, perhaps more accurately, standards and accountability from being hollowed out – is to have a free education market. Without that, the people who would be held accountable for getting kids to high standards will exert strong –

and if past is prologue, likely overriding – political pressure to have the standards weakened or accountability hobbled.

Of course, some arrangements that maintain a connection to government rewards or sanctions are better than others. Most important is to have no connection to the federal government, which eliminates “one-stop shopping” for those who would prefer low standards. It would also be advisable to keep state carrots and sticks to a minimum lest there be a repeat of the largely ineffectual, state-level, standards and accountability movement that preceded the CCSSI. That means neither districts, schools, nor students should be punished or rewarded by states or Washington for performance.

If the standards are decoupled from rewards and sanctions then their integrity can be largely protected. That said, the less politicized the governing entity, the less politics are likely to seep in. That means a truly private entity would be best to take charge of the standards rather than one like CCCSSI which is directly connected to governors and state school officers.

- 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)?

First and foremost, to avoid swift gutting of the CCSSI standards, it is critical that the feds neither undertake nor fund any of these functions: No development and revision of the standards, no research on validity, nothing on fidelity of state implementation, etc. Allow Washington to do or fund these things and it opens the door to Washington identifying “problems” and undertaking “solutions.”

What could a truly independent – meaning private – governing body of the CCSSI standards do? It could certainly assess the validity and effectiveness of the standards, though other entities would also have to do these things to keep what would essentially be a CCSSI self-assessment honest. It could also monitor state additions to the standards to keep within the “additional 15%” rule, though this would only be done to document the integrity of implementing the CCSSI model – not impose the standards – in either the largely voluntary or fully privatized systems needed to fully protect the standards from dumbing down.

The governing body should probably steer clear of creating curricula or other products to go along with the standards, which would simultaneously make CCSSI the standards-setter and a vendor. That would be a particularly problematic arrangement if adopting the standards were to be politically coerced, because it would give the CCSSI – who wrote the governmentally mandated standards – a politically privileged position as a curriculum or textbook publisher for their own standards.

Most important, though, is that if the CCSSI standards are to be free of real or imagined biases, they must be offered as nothing more than exemplars that autonomous, private schools are free to adopt. They cannot be imposed by government at any level or they will be gamed.

- 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?

There is only one solution to the dumbing-down power of politics, and that is to decouple schools and tax dollars by letting parents control education funding and giving all educators autonomy to set their own standards. Then the political pressures to dumb down standards will be gone because educators will have to please parents – rather than controlling politicians – for their livelihoods.

Assuming that the CCSS standards are close to the best available, in a free-market system this is how the standards would be funded going forward: Schools adopting them would pay to be able to say that they are recognized as using those standards. That, in turn, would attract parents, and if the standards were sufficiently desirable to parents both the schools and standards-governing body would stay in business. That is the only funding model – one that decouples politics from accountability – that can make high standards truly sustainable.

Short of that, funding for the standards governing body should come from the lowest levels of public schooling authority possible, and there must be no rewards or sanctions attached to performance on the standards. So individual public schools could pay fees to the governing body if they wished to use the standards. Slightly worse, because it would introduce higher-level and broader politics, would be for districts to pay for the standards if they wish to use them. State- and federal-level payment should be avoided because those levels of government are too high and broad to escape special-interest capture.

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

While repeated failed efforts to impose rigorous standards and accountability on American schools through top-down government have hammered home the folly of such efforts, there is a need for exemplary standards. By many indications, the CCSS standards are much better than what's prevailing in monopolistic public schooling right now, and for that reason they should be lauded. Indeed, because they appear to be of high quality they need to be vigorously protected from political forces, which can only happen if they are separated from politics. That means adopting them must be truly voluntary, and they therefore must ultimately exist in a system based on parental choice and private schools.

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*?

If the intent behind common standards is to have comparability among all states, then it is difficult to imagine more than one assessment system ultimately prevailing. Allow more than one, and states would be able to shop between the two, picking whichever assessment regime is less challenging and then bouncing between the two as they change their levels of difficulty. Having just one assessment, however, will not ultimately solve the dumbing down problem: If the assessment is high-stakes for either students or schools, great political pressure will be brought to bear to either make the tests easier, the standards lower, or both.

To decrease the effect of political pressure on the exams it would be best to ultimately have multiple test creators, none governmental. It is harder for organized interests to attack multiple targets, especially if they are private entities that do not depend on votes for their survival.

Of course, privatizing test creation and management will hardly eliminate political pressures to make the assessments easy to pass. As long as states or even districts determine what the standards will be and tests used, political power will remain the coin of the realm, especially if there are meaningful consequences attached to test performance. Only putting parents in control of education funding and letting them choose among private educational options will change that.

- 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)?

The consortia should create model assessments and then get out of the assessment business, leaving that to private entities. Right now, of course, the consortia are working at least partly to get federal money. If this kind of arrangement remains then federal politics will begin to seep into the assessments, especially if the assessments are in any way high-stakes. That said, even if going forward these become truly voluntary state efforts, they would still be subject to state political forces if the tests were high-stakes.

Ultimately, to have assessments largely free of powerful political interference, the standards and assessments must be decoupled from government, which means their results cannot be used to determine what funding schools or districts do or do not get, and whether or not students advance grades or graduate. Do that, and there are only relatively limited gutting threats if the assessment-makers set participation guidelines, cut scores, or even rate schools. Indeed, even if the governing entities are government connected like the current state consortia, yes, they could be pushed to dumb down assessments if results are poor, but the push is likely to be much less forceful if only shame, rather than money, is on the line.

Once again, though, ultimately the best arrangement is an educational free market, where different schools and assessment companies could use different cut scores, exclusion policies, accommodations, etc., in order to best serve the nation’s very diverse population and drive vital competition and innovation. This is also the key to preventing the hollowing out of assessments.

- 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?

If the test is high stakes, it won’t matter: Politics will dumb it down. If not, it would be best for the standards governing body not to also run the assessment but to allow individual schools to choose among multiple, private providers. Then, if nothing else, tests could be created that emphasize different parts of the standards, keeping in mind that all kids are different and shouldn’t be treated as if they are the same.

- 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?

Just as with paying for standards, there is only one solution to the dumbing-down power of politics, and that is to decouple schools and tax dollars. Then the political pressures to dumb down assessments will be gone because educators will have to please parents – rather than controlling politicians – for their livelihoods. That means assessments should be paid for by autonomous private schools choosing among private assessment providers in a free education market. Second-best would be individual public schools choosing among private assessment providers. Worst in the political power continuum would be for the federal government to control the assessments it requires all schools to use, and second-worst would be state consortia controlling assessments paid for with federal dollars.

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

Standards and assessments obviously go together in the standards and accountability movement. But that opens up two avenues for gutting accountability: Either making standards weaker or tests easier. That means standards could stay untouched but assessments made easier, or standards weakened and assessments unchanged. Regardless, as long as government money is at stake, either or both will be used to hollow out accountability.