



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 **Rod Paige**’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.)

Rod Paige

7th U.S. Secretary of Education

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 question represents the *make or break* issue for the Common Core State Standards Initiative (CCSSI). How it is answered will be the major determinant of the degree to which CCSSI will succeed or fail. The best historical lesson to guide us in our quest for the best answer can be found in how Secretary Bennett addressed a similar situation involving the National Assessment Governing Board (NAGB). Secretary Bennett appointed the Alexander-Jones Commission—a diverse blue-ribbon commission—to study the question and make appropriate recommendations. The work of this commission and the resulting success of the National Assessment of Educational Progress (NAEP) operation should serve as a model to guide us as to our best hope for the most effective answer to this challenge.

Having said that – and venturing into the dangerous area of opinion – there seem to be three logical approaches to the Common Core State Standards governance question that make sense: (1) allow the National Governors Association (NGA) / Council of Chief State School Officers (CCSSO) coalition manage the governance process; (2) turn the entire operation over to the NAGB/NAEP organization; or (3) develop and operate a new governance structure altogether. Because of the complexity and daunting startup issues, in addition to the time required for a new structure to become operational, let us rule out the option of creating a new governance operation from the ground-up.

Now the question is reduced to, “Which is better: let NAGB do it, or let the NGA/CCSSI team continue as the ‘go-to’ unit for CCSSI governance?”

To make an effective choice between the remaining two options, we must deal with several other troubling managerial/organizational questions – three of which stand out. First, to what extent would the additional governance responsibilities associated with the CCSSI governance and operations dilute NAEP’s current quality level? Stated differently, can the NAGB operate effectively with a bifurcated focus? Secondly, if we have an effective Common Core State Standards and Assessments operation, do we still need NAEP? Finally, how would the current NGA/CCSSI operation structure a governance operation for CCSSI?

A more troubling aspect is the overt *political* environment in which the CCSSI initiative will operate. Let us assume that five to 10 years down the road, the CCSSI is being successfully implemented; i.e., there is one unified series of academic standards guiding our public education system, and there is one unified – and rigorous – assessment process to measure student achievement against those standards. As has been the movement in the last 15 years, government/public policy will have this system as the foundation of our student/school/system accountability matrix, as well as one of a series of tools (albeit a critical component) by which teacher effectiveness is measured.

There is little doubt that such a NAEP style/CCSSI assessment system will show vast areas of our public education system failing. It will also identify major deficiencies in the strength of our human capital resource in education. The critical goal, then, will be how to protect this centralized and fundamental evaluation system from being subtly, but inevitably, compromised by the education establishment – school boards, teachers unions, superintendent associations, and yes, state chiefs – when that process highlights the warts of the system. In other words, if we are able to successfully implement a rigorous

process, what structure would best protect the rigor of the system against the inevitable assault that will be forthcoming from those most at threat?

An equally perplexing challenge is the balance between the legitimate interests of the critical actors in our democratic system (i.e. governors and state legislatures) who have the ultimate responsibility via their state constitutions with ensuring an adequate public education system, and the desire to keep the standards and assessments as “apolitical” as possible, with minimal or no political influence. What role, for example, should the government officials constitutionally be responsible for providing?

Of course, we have no answers for these questions. We are therefore left simply with our opinion, which we admit is without strong evidential basis. There are pluses and minuses associated with a CCSSI governance operation run by either NAEP or NGA/CCSSO. Therefore, my suggestion is that a commission similar to the Alexander-Jones Commission be tasked with sorting out which of two approaches to CCSSI governance provides the best chances for effective and efficient CCSSI operation.

Possibly with more courage than wisdom, let me share another critical concern. While I understand the entire CCSSI is coming under the banner of the CCSSO and NGA – and thus can be claimed to be an initiative of State Chiefs and Governors – you and I know that this is really being driven by the *staff* of those organizations, along with certain interest groups funded by some very influential foundations. Most Governors have not strongly championed this as a central tenet of their education agenda; and of the 37 gubernatorial races this year, I do not know of a single one that the main education issue is CCSSI. Many state chiefs are buying in simply because there is money behind it, including now the strings attached to federal Title I dollars. Very few high stakes national public policy initiatives have ever been able to get traction without not just a buy-in, but a strong championing from the political powers, at the federal or state/local level. Federal/national education initiatives are more vulnerable because historically our education delivery system is built on the notion of local funding and control. For all the talk in Washington among the education elite – this initiative, in my opinion, does not have state political buy-in. In a way, it is somewhat like where we were with Goals 2000 in the 1990s; granted there is much more money behind this effort, but strictly from a political foundation, I do not see it. So, the question here is how to build in local/state support for this during the out years, while still attaining the goals of those who are championing this now. Frankly, on that, I draw a blank...

- 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?

Note that in the previous question I indicated that, *“Because of the complexity and daunting startup issues, in addition to the time required for a new structure to become operational, let us rule out the option of creating a new governance operation from the ground-up.”* Even in the face of the fact that I know that some can make a credible argument that building a new governance operation from the ground-up would offer the advantage of freedom from negative baggage associated with an existing operation, I still believe CCSSI governance provided by a choice between CCSSO/NGA and NAGB offers our best hope. Therefore, my response to this question is **N/A**.

- 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”?

One of the advantages of building a CCSSI governance structure from the structures already well developed and operational at either NAGB or CCSSO/NGA is that the question of higher education and employers is already settled. Higher education and employer involvement is already operational. For example, during the standards development process, CCSSO/NGA had representatives from higher education as well as the business community participate in several of the working groups.

Whichever governance structure is adopted, representatives from employers and higher education should be considered for representation on governing boards providing governance for the CCSSI. The big question is, how do we do this? Should the representatives be chosen for existing credible Higher Education and Employer organizations such as the U.S. Chamber of Commerce, American Council on Education, the College Board, and the American Association for Higher Education & Accreditation? Or should representatives be chosen from actual folks in the field who do the hiring for the companies (big and small), make the determinations of who is admitted to a university, or are involved in the skills training of students who come out of our K12 education system with no employable profile?

- 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 validation committee concept worked well during the standards development process in its task of reviewing and verifying the standards and the resulting evidence-based college- and career-readiness standards. A similar concept should be considered during CCSSI governance and assessment operations specifically tasked with assuring that CCSSI standards and assessments are research and evidence-based, aligned with college and workforce training program expectations, reflective of rigorous content and skills, and internationally benchmarked.¹ This validation committee should provide recommendations to the ultimate governing board, rather than be the ultimate decider.

- 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)?

Expanding CCSSI governance responsibilities beyond standard development and assessment would convert a highly complex undertaking into a virtual certain disastrous quagmire. Tasks beyond standard development and assessment referred to above should be left to others such as think tanks, research organizations and universities, as well as those in the for-profit market that excel in this area.

¹ National Governors Association. “Common Core State Standards Initiative Validation Committee Announced: NGA Center, CCSSO Release List of Validation Committee Members.” National Governors Association. <http://www.nga.org/portal/site/nga/menuitem.6c9a8a9ebc6ae07eee28aca9501010a0/?vgnextoid=f541ea15a18e3210VgnVCM1000005e00100aRCRD&vgnnextchannel=759b8f2005361010VgnVCM1000001a01010aRCRD> (accessed 28 June 2010).

This question, though, introduces another issue – namely, how often should the standards be revisited? With every reexamination, with every modification to the standards, a new round of revisions will result with added expenses in curriculum and assessment redesign, new professional development needs, and possible major realignment of accountability systems. The impact of any revision will ripple throughout the entire system. Thus, should a mandated periodic review of the quality and practicality of the standards be built in up front, or should the reexamination take place on an “as needed” basis?

- 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?

The entire operation should be paid for by federal funding supplemented by a reasonable fee charged to member states. Federal funding similar the funding of the National Institutes of Health (NIH) and the National Science Foundation (NSF) should form the foundational support for CCSSI. Federal budget request for the NIH and NSF are \$32 billion and \$1.424 billion, respectively. The relationship between the federal government and CCSSI governance should resemble that between the federal government and NIH and NSF.

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

You have chosen to bifurcate the standards and assessment task into separate concepts of governance for standards, and governance for assessment. Notwithstanding the fact that the two are presently managed separately, one by a partnership between NGA and CCSSO, and the other by the government, my responses to the questions are based on my belief that standards and assessment are one and the same and would best be governed and operated by a single entity.

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*?

Multiple consortia providing assessments aligned to the common standards presents certain challenges. CCSSO/NGA recognized this and brought several consortia together with the hope of causing the consortia to:

- embrace a common vision for assessment;
- develop a list of shared priorities for leveraging Race to the Top funds to design next generation assessment systems;
- merge their efforts considerably to reduce the number of consortia moving forward; and
- agree to participate in a joint NGA/CCSSO project to ensure comparability of

summative assessment results across consortia and to reduce costs by collaborating on other activities.²

Through this effort, we are left with two major assessment consortia: **Smarter Balanced Consortium** and the **Partnership for Assessment of Readiness for College and Career Consortium**. Although these two consortia share some commonalities with regard to vision, they have very different ideas about priorities for the short term. Over the short term, **Smarter Balanced** appears to be more focused on normative type assessments which would be helpful to teachers and schools, while **Partnership for Assessment of Readiness for College and Career** Consortia seems to focus more toward summative type assessments.

While there are advantages for CCSSi affiliating with a single consortium, choosing the consortium which best aligns with CCSSi goals and governance structure, and contracting with them under terms which are under the governance control of CCSSi, there are also troubling concerns.

I am concerned about the ability in the future of the marketplace to provide quality assessment instruments – as well as services to the education community – once the number of available vendors is limited due to the consolidation of the market via the consortium work. If, as anticipated, one or two vendors provide the bulk if not the totality of the assessments used in public education, the other vendors who are not chosen by the consortium will not survive during the out years and thus will be driven out of business. In other words, there will be a move to a monopolization of the assessment provider industry to one or two actors. The ability of states to negotiate service or price modifications to existing contracts will be nonexistent because there will be no viable threat on the part of a state to take their business elsewhere. Currently, this is an unforeseen impact of the move to consolidation, and the potential consequences could be large.

- 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 assessment consortium should play no role beyond test development and implementation.

- 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 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— there should be some distance between its governance system and CCSSi. This to reduce the potential for monopolistic tendencies associated with the sort of centralization a single governance operation represents.

² National Governors Association and Council of Chief State School Officers. “Designing Common State Assessment Systems.” National Governors Association. <http://www.nga.org/Files/pdf/1004NGACSSOASSESSMENTS.PDF> (accessed 28 June 2010).

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?

The entire operation should be paid for by federal funding supplemented by a reasonable fee charged to member states. Federal funding similar the funding of the NIH and the NSF should form the foundational support for CCSSI. Federal budget request for the NIH and NSF are \$32 billion and \$1.424 billion, respectively. The relationship between the federal government and CCSSI assessment should resemble that between the federal government and NIH and NSF.

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

You have chosen to bifurcate the standards and assessment task into separate concepts of governance for standards, and governance for assessment. Notwithstanding the fact that the two are presently managed separately, one by a partnership between NGA and CCSSO, and the other by the government, my responses to the questions are based on my belief that standards and assessment are one and the same and would best be governed and operated by a single entity.