



State Accountability in the Transition to Common Core

by Victoria Sears

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Many states across the nation are well underway with the challenging work of implementing the Common Core State Standards (CCSS). But what does a thoughtful transition from existing to new standards look like? And what are the implications for accountability systems in the interim? After all, high-quality accountability policies must be linked to reliable measures of outcomes, such as student growth and proficiency rates and results from principal and teacher evaluations—all of which are contentious and difficult to develop and put in place but even more so when state educational standards are in flux.

The purpose of this brief is to provide Common Core "insiders" with some cautionary advice about what key policymakers and influentials in a handful of states now see as transition challenges. In August and September 2013, the research team at Fordham interviewed officials and policy advocates in five states—Arkansas, Colorado, Florida, Massachusetts, and New York—to glean how they are approaching accountability in the transition to the Common Core. We asked leaders about their plans for using student data during this transition period, and in particular what the "stakes" would be for schools, educators, and students. While we found nuances in each state, four trends emerged across our small sample.¹

1 The accountability moratorium is here. Punitive consequences associated with accountability are largely being put on hold during the transition to Common Core.

In many states, Common Core implementation has unfolded gradually. The standards were initially piloted in select grades, schools, and districts, with new content added to student assessments incrementally. While implementation is now ramping up across the nation, many critical components of existing accountability systems (such as how to calculate growth as students transition to new exams and what to do about growthbased accountability and evaluation systems for teachers, schools, and/or districts) remain to be determined. For example, an official in Colorado stated that many accountability decisions that require student data will remain unresolved until they have hard data and the Partnership for Assessment of Readiness for College and Careers (PARCC) test fully in place. Policymakers and educators alike are grappling with the reality that the inputs (such as state tests) used in accountability measures are changing—and they are often resistant to using student test data to trigger negative consequences usually associated with poor performance. Of particular concern is how to calculate growth as students transition from one exam to another and what to do about growth-based accountability and evaluation systems in the interim. Our conversations indicate that in light of these challenges, policymakers are, by and large, planning to pause the consequences associated with these systems.

Proponents of this tempered approach stress that it is simply smart implementation. (Of course, it's also smart politics.) They emphasize the difficulty of gauging student learning and calculating learning gains as assessments change from one year to the next, and they contend that until the new assessments can be validated, it's unfair to base teacher and school evaluations on state standardizedtest data. To wit, several states, including New York and Colorado, have formally adopted a "hold-harmless" approach to accountability in the transition, prohibiting high-stakes consequences until the standards have been fully implemented. Others are taking a similar approach to accountability.

An early adopter of the Common Core State Standards and a governing state in the PARCC consortia, New York instituted a hold-harmless component to testing in the 2013–14 school year, ensuring that no negative consequences (for students, teachers, schools, or districts) would occur as a result of student test scores in the transition to Common Core. Though the state's new teacher-evaluation system, passed in 2011, includes a measure of student performance on state assessments (comprising 20 percent of a teacher's overall rating), New York's Department of Education encouraged "thoughtful usage" of student test data as opposed to using test scores as the sole basis for high-stakes decision making. Yet many educators felt these efforts did not go far enough, and in April 2013, state union leaders and American Federation of Teachers president Randi Weingarten issued a call for a multiyear moratorium on high-stakes consequences for both students and teachers during the current transition phase. Just last month, Governor Andrew Cuomo acknowledged the need for a pause on accountability for both students and teachers; while exams are still being given, student results on new Common Core tests will not be listed on student transcripts or used in gradepromotion decisions. The state is now considering a delay in the use of student test scores in teacher evaluations and has "frozen" the status of focus schools (Title I schools that have the lowest achievement and graduation rates for accountability subgroups) and priority schools (schools among the lowest 5 percent in the state, based on student performance), meaning that schools will not be added to either category until the 2015–16 school year.

Colorado has taken a similar hold-harmless approach to accountability during the current school year. In previous years, teachers who received two sequential ineffective ratings were placed on probationary status. This school year (2013–14), student state test scores will still be included in teacher evaluations. However, ineffective ratings will not count towards teachers' probationary status until the 2014–15 school year, and teachers will not be put on probation until 2016–17. The state has also taken a gradual approach to transitioning its assessments. It began testing all students on standards common to both the old Colorado standards and the Common Core in Spring 2012, and it plans to transition to PARCC assessments in 2014–15. Despite this gradual conversion, however, Colorado remains cautious about how assessment results will be used. Officials made it clear that a deeper understanding of the test is needed, as well as time for the assessments to stabilize, before high-stakes decisions are made. One official noted this was to "ensure no one gets harmed during the transition."

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Florida, too, is taking steps to pause new sanctions during the transition to the Common Core. Lawmakers in the Sunshine State recently submitted a bill to Governor Rick Scott calling for a one-year pause on the advancement of school sanctions (SB 1642), and the bill was approved this month. Citing the transition to a new state assessment next school year (more on Florida's assessment plans to follow), the bill provides schools with a one-year reprieve from sanctions based on Florida's "A-F" school grading system (based largely on factors such as student performance on state tests and graduation rates). While student performance data will still be collected and schools will still be graded, no negative consequences will trigger as a result of poor school grades or school improvement ratings during the 2014–15 school year; the state plans to use this first year of data as a baseline to measure schools. As before the bill, the state has not yet set benchmarks for teacher evaluation and effectiveness, but confirmed teachers will be judged by their contribution to student growth (using value-added data) rather than by absolute proficiency. State officials also stressed that teacher evaluations will take up to three years of test scores into account, with the intent of smoothing out possible anomalies that result from transitioning to a new assessment next school year. A state representative also confirmed that students will not need to pass the new American Institutes for Research (AIR) assessment in order to graduate, but will still be required to pass existing state tests in order to meet graduation requirements.

Many critics of the Common Core, especially those on the left, worry that the new, higher standards will be used to attack educators or schools. Yet taken as a whole, our interviews with officials in five states indicate that concerns about educators, schools, and districts being unfairly penalized are unfounded, at least in these jurisdictions. Accountability systems remain in place, but the high-stakes aspects have been removed or muted, at least temporarily. Yet it is clear that misconceptions about accountability in the transition phase persist. State leaders should make a concerted effort to communicate this "accountability intermission" to all students, educators, and the public but should also take steps to make sure that high-stakes accountability returns in full as soon as is appropriate.

2 Overall, states are treading carefully and strategically with assessments, since the quality of the forthcoming tests is still unknown.

One reason that state education officials are hitting the pause button on accountability is that the tests used to assess student achievement are very much still in flux. State consortia-designed tests will not be operational until the 2014–15 school year. In the meantime, how are states approaching assessment during the transition?

We observed four approaches. The first strategy is to modify existing state exams to cover the content of both the old state standards and the Common Core. For example, in Massachusetts, the state's new MA 2011 standards are actually a combination of the preexisting state standards and CCSS; each year, additional Common Core content is being integrated into the Massachusetts Comprehensive Assessment System (MCAS). In Colorado, the state is using the Transitional Colorado Assessment Program (TCAP), an interim exam bridging its old standards and the Common Core standards. Officials explain that this paced approach is intended to ease students in to the new, more rigorous content, rather than making an abrupt, disruptive switch.

A second strategy, used in Massachusetts, Colorado, and Arkansas, is piloting Common Core–aligned exams by introducing them to select students or districts first before administering them statewide. For example, in Massachusetts, the state is currently field testing PARCC this school year (2013–14) to establish the validity and reliability of the tests, then combining that administration with continued use of the MCAS. For the 2014–15 school year, officials explained that K–8 schools can choose which test to use (PARCC or MCAS) and all high schools will continue using MCAS. Not until the 2015–16 school year will students begin to take PARCC assessments, and only then if officials determine that the exam is superior to what the state developed itself (more on this below). The board will not make a final vote on PARCC until Fall 2015, when the first PARCC results are available.

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New York, on the other hand, has taken a third approach, creating completely new Common Corealigned assessments from scratch rather than modifying existing tests. The new assessments were administered to students in ELA and math in grades 3-8 in 2012-13. Student scores dropped noticeably, and while officials were quick to stress that the drop was likely the result of a rise in standards rather than a decline in student performance, public confidence in the new standards and assessments was deeply shaken. One stakeholder referred to the drastic drop in test results as "alarming" and "confusing" to teachers. In addition to administering its new, "homegrown" state assessment, New York is also currently participating in PARCC field testing. A PARCC representative reports that several hundred schools participated in both sessions of the field test, but the state is still considering whether it will administer the PARCC assessment once it becomes fully operational down the line. Like Massachusetts, New York is taking a wait-andsee approach.

Florida has taken yet another tack. While Common Core implementation continues, debate over the standards in the state has been particularly heated. Tellingly, during our interviews last summer, a stakeholder from the Department of Education stated that one of the most difficult aspects of implementing the Common Core standards has been addressing the misconceptions and the politicization of the issue in the state. Since then, Florida has stepped down as PARCC's fiscal agent, withdrawn from

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the testing consortia entirely, and issued an "invitation to negotiate" (ITN) to assessment vendors to develop its own, Florida-specific standardized tests. In March, Florida announced that it was contracting with the American Institutes for Research (AIR) to develop new assessments for the upcoming school year (2014–15). It also recently rebranded the Common Core as Florida's "Next Generation Sunshine State Standards," supplementing the original Common Core standards with additional benchmarks and skills, such as handwriting and cursive.

Unsurprisingly, as implementation accelerates and states near the transition to Common Core–aligned assessments, pushback on these new tests and standards themselves is growing. In New York, for example, Common Core opponents contend that the state rushed the transition to new exams and that the lower student test scores will unfairly penalize teachers (which led the state to require that test scores not trigger negative consequences for teachers, schools, or districts).

State officials shared with us a different fear: that the new consortia-developed exams will not be rigorous enough or valid enough for use in the state's existing accountability measures. Several states we spoke with revealed that they are reserving the option to revert to their individual state assessments, should consortia-designed CCSS assessments ultimately fall short. As noted earlier, New York has yet to decide if it will transition to PARCC in the coming years. Massachusetts has also been notably candid about its plans to evaluate the rigor and validity of future Common

Core assessments, particularly given the state's historically high student-achievement levels and highly regarded state standards and assessment system. The stakeholders we interviewed in the Bay State were quite clear that the state will go with whichever assessment system is most effective and valid, whether that means using common consortia assessments or returning to its own state assessment. Colorado is also taking a wait-and-see approach. The state is preparing to administer the PARCC test to all students in 2014–15, but it is also weighing its options if issues arise with the PARCC assessments.

Arkansas too is cautious about its transition to Common Core–aligned assessments. While the Natural State introduced the Common Core State Standards in 2011, its state assessment (Arkansas Benchmark Exams) remains the same. Arkansas is currently field testing the PARCC assessment and plans to administer the PARCC exam in the 2014–15 school year. Unlike New York, Massachusetts, and Colorado, the state has not developed any sort of transitional assessment for the interim.

On the whole, these five states are approaching assessments cautiously. While there are wise and welljustified concerns about whether assessments will be ready on time, high quality, reliable, and valid, state officials should be careful that their testing doubts do not project skepticism about their commitment to the standards themselves. If states appear to have "one foot in and one foot out" of Common Core implementation, stakeholders (including teachers) are likely to lose confidence.

3 While state education agencies express conviction that teachers are being adequately prepared to teach the new standards, the quality and effectiveness of Common Core trainings and professional development is unclear.

While states opted in to Common Core, true implementation occurs at the school and classroom levels. Therefore, it is vital that educators have the necessary resources and support to successfully teach to the new standards and that Common Core professional development and trainings for educators are of high quality. In our interviews, stakeholders frequently referenced state-sponsored and state-recommended professional-development opportunities, trainings, and resources for teachers. They expressed confidence that teachers were being prepared adequately through these offerings. Yet missing was any discussion of whether and how states are assessing the effectiveness of these offerings. And if the quality of these supports is unclear, so is overall educator readiness.

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In Massachusetts, for instance, officials stressed that educators were heavily involved in efforts to revise the state's standards, curriculum, and assessments, all of which meld the Common Core and the state's prior content standards. As was the case in other states, officials pointed to the copious support and training sessions made available to teachers and instructional leaders. They reported favorable responses from educators but nothing about the quality of the trainings and resources. Fortunately, since Massachusetts's prior standards are comparable in rigor to the Common Core standards, educators in the Bay State may be better positioned going into the transition than others. Similarly, the state does not expect the drop in student performance that other states will witness (or have already) post–Common Core transition.

New York is unique in that it is building a full statedeveloped, Common Core–aligned, voluntary K–12 curriculum for both math and ELA. When asked about professional development and support for educators during the CCSS transition, stakeholders highlighted the availability of these comprehensive curricular resources, as well as recurring statewide trainings on the Common Core, which are held several times a year. However, while New York forged ahead with a new Common Core assessment last school year, the state's curricular materials are not slated to be fully complete and available online until July 2014. As a result, many educators feel they were not given adequate time to prepare their students prior to the assessment transition and now remain apprehensive about the potential arrival of PARCC next year. Though New York has made impressive strides on the curriculum front, it's unclear whether teachers are actually prepared to teach to the new, more rigorous standards. State stakeholders acknowledge that professional development has been a major challenge and learning curve and are working to improve offerings based on participant feedback.

Similarly, education officials we spoke to in Florida last summer emphasized that professional development is and will continue to be a focus during the transition to the Common Core. While it is doubtless that trainings will shift with the arrival of the new AIR assessment next school year, stakeholders stress that, to date, Common Core–related trainings have elicited positive responses from teachers as well as high attendance, seemingly the primary indicators of quality.

By and large, state education agencies (SEAs) appear to be positioning themselves as large-scale leaders of Common Core implementation by providing general direction, guidance, and troubleshooting (for example, how to include results from new assessments in existing accountability systems). While we are reluctant to advocate for any single form of professional development and training (some states choose to handle it themselves, while others leave it to districts), we encourage SEAs not to be naïve about whether educators are truly prepared, especially when it comes to content and curriculum. SEAs need to be aware that despite their best efforts, student test scores might drop, and they must be prepared for pushback if new assessments reveal that teachers, schools, and districts are not doing well. The stakes are great; if educators are not fully trained to teach to the new standards, the Common Core will not succeed in its ultimate goal: improving students' college and career readiness.

4 Though ESEA waivers were granted to give states additional flexibility, states are now finding themselves locked into a set of new, yet still restrictive federal policies.

As Rick Hess and Michael McShane stress in Common Core Meets Education Reform,² it is foolhardy not to consider how the Common Core standards fit into the broader education-reform agenda. How competing reforms and policies, such as the Common Core and teacher evaluations, will impact one another remains to be seen.

To date, the vast majority of states have received permission to adjust their accountability systems and gain flexibility from NCLB's stringent "adequate yearly progress" requirements. But how do existing accountability provisions affect Common Core implementation across our small sample of states?

Unfortunately, in many cases, states that adopted the Common Core and applied for ESEA waivers are now finding themselves in a difficult place. While most states have embraced more rigorous academic standards by adopting Common Core, they remain accountable to prior waiver commitments to improve student achievement and instructional quality that were based on the old, lower standards and easier tests. The U.S. Department of Education has permitted waiver states to postpone using student achievement to evaluate educators and make highstakes personnel decisions, but whether the Department will be as flexible with other aspects of accountability remains unclear.

One example of the tension created by changing accountability inputs is that most states use student learning as one gauge of teacher performance. However, as states begin to implement CCSS, many are unsure of how to calculate proficiency and growth thresholds, particularly as assessments are changing. Another complication is the tiered accountability systems in place for schools and/ or districts in many states. States that have adopted these tiered accountability systems, with increasing sanctions for schools and districts for greater years of demonstrated poor performance, must now figure out what to do when low test scores on new assessments push previously underperforming schools and districts into the highest level of remediation. Will states reset improvement windows or simply pick back up where they left off? The implications of these decisions and where cut points are drawn are sizeable.

This is certainly the case in Massachusetts, where the state revised its accountability system as part of its ESEA waiver but also has a preexisting tiered accountability system in place. Under Massachusetts's tiered system, schools and districts are ranked into five levels based on four years of student performance on state assessments. The highest-scoring schools and districts are given greater degrees of autonomy and flexibility, while chronically underperforming schools face state takeovers or oversight. While Massachusetts does not anticipate a huge drop in student scores after fully transitioning to the Common Core standards and assessments, it is unclear how the state's accountability provisions may be affected by the changing inputs to these measures.

Arkansas also revised its accountability provisions under its ESEA waiver and is now rolling out the new system while also implementing the Common Core. Similar to Massachusetts, Arkansas delivers targeted interventions to the lowest-performing schools, while giving more autonomy to higher-performing schools. However, per its ESEA-waiver conditions, even after the state transitions to the Common Core standards and Common Core– aligned tests, the state will remain committed to reducing proficiency gaps by 50 percent by 2017.

In Colorado, the Education Accountability Act (Senate Bill 163) outlines accountability measures for states, districts, and schools. Under this system, districts placed into the lowest-ranking category are given five years to improve, and starting in the 2015–16 school year, districts can potentially lose their accreditation. However, as schools

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and districts in the state begin to implement Common Core–aligned standards and assessments, cut scores and performance expectations will likely change. Similar to the issues other states are facing, educators and policymakers in Colorado will need to decide whether to reset the five-year improvement window or simply pick back up where they left off under the old system. As it is likely that the lowest-ranking category will shift, where does that leave schools that previously received supports and are no longer? What will happen if a much greater number of schools are identified as eligible for support?

State education leaders are facing no easy task as they implement the Common Core, all while ensuring that their efforts are not undercut by anxious teachers or politically motivated lawmakers. In a perfect world, implementation would be linear: first come the standards, then curriculum development, then the tests, and then smart accountability systems. Of course, SEAs are not starting from scratch and don't have time to waste. Teachers are being trained on the content and curriculum, while at the same time states are preparing students to take Common Core-aligned tests, all while operating under preexisting systems of highstakes accountability for educators, schools, and districts. It's no easy feat. However, the successes and challenges we see across the nation indicate that there are actions state leaders can take to ensure that the transition, while difficult, is as smooth as possible for stakeholders across the board.

Clearly, policymakers must put serious thought into how previously negotiated accountability systems will mesh with new standards and assessments. If states require additional flexibility, will the federal government allow states to revise their accountability systems accordingly?

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The Common Core is at a critical juncture. While many recent surveys show that support for the standards themselves remains strong, implementation in the five states we studied has not been without major challenges. The new standards are more rigorous and challenging than most states' prior standards, presenting a steep learning curve for students and teachers alike. Overall, it's unclear whether existing professional development has sufficiently prepared teachers for this shift. Additionally, the field still lacks a comprehensive, high-quality Common Core–aligned curriculum, and the as-yet-unreleased Common Core assessments are another unknown. Until some of these questions are resolved, the high-stakes aspects of accountability in these five states have been shelved—which is appropriate and probably inevitable. How soon the country can return to a high-quality system depends on how quickly we can move through the current, somewhat awkward phase of early Common Core implementation.

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ENDNOTES

1. These findings were initially published in December 2013 via four installments on Fordham's *Common Core Watch* blog. See http://edexcellence.net/commentary/education-gadfly-daily/common-core-watch/the-accountability-moratorium-is-here.

2. See: http://www.edexcellence.net/commentary/educationgadfly-daily/common-core-meets-education-reform-what-it-allmeans-for-politics.



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