



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 **Paul Manna’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?

Rather than looking at governance 20 years out, I think it makes more sense to think in terms of short-, medium-, and long-term possibilities (e.g., 5-, 10- and 20-year timeframes). As Musick noted in his paper, it took 20 years of NAEP and few twists and turns in the road before we got NAGB. In the short term, I don't see any advantage to concocting a long-term governing strategy. The country should let the Common Core effort play itself out for a few years at least and then see the extent to which and where it gets traction. With time the country will be able to identify some of the soft spots; look for emerging points of agreement and disagreement among the states; and see what state "adoption" of Common Core actually translates to in practice. A potential disadvantage of establishing a formal structure at the current moment would be the danger that we lock in something that closes off more promising options, or prompts political fights that derail the effort. Political scientists and economists call that potential the issue of "path dependence." Once we march down one path, others may be closed off. In the short run, I'd say let's keep Common Core in the arms of the current ad hoc network for now so we can learn more.

Looking medium-term, at least a few issues seem important. First, educational governance is a complicated matter at the state level. Governors, legislatures, state boards, and state chiefs have some say over how standards, assessments, and accountability unfold. Any medium-term governing arrangement would seem to require representatives from these groups because ultimately they will have the power to shape state policy to incorporate the Common Core standards into their K-12 systems.

Over the long haul, I do not think that turning over everything to NAGB or some other organization would be smart. CCSSI should not be an add-on project to a preexisting group because it would not get the priority it deserves. It would have to compete for attention and resources from within that other group's menu of priorities. Further, a current virtue of Common Core has been the relatively safe distance it has kept (so far, at least) from the federal government. While there may be good substantive reasons for the feds to get more involved (e.g., providing money to help finance the effort), Common Core will have a better chance to succeed politically if people cannot make the claim that it has been co-opted by Washington.

- 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?

My answer to #1 started to get into some of these ideas. In the short run, I would keep things as the present loose network of participants that have jumped in to launch Common Core. After that learning

period, though, something more formal will need to emerge if the effort is really going to penetrate the fabric of the nation's K-12 system.

Looking medium- to long-term, representation from the key policy-making powers (governors, legislators, state boards, state chiefs) would be important to maintain. I would steer clear of federal membership, even of the *ex officio* sort, for the sorts of political reasons I discussed in #1. Regarding the other potential members listed in the prompt, I definitely believe they should be involved in the future work that Common Core produces. That doesn't mean, though, that they should necessarily be governing members. Common Core is a state effort, after all. Local districts, teachers, specialists and others can all provide important insights, to be sure. But rather than bringing those groups in as governing members and allowing them to wield formal decision-making authority, I'd keep them involved through working groups or study committees that provide guidance to the individuals governing Common Core. Governing an effort involving potentially all 50 states will be hard enough, as some of the working papers suggested (e.g., Musick, DeVito). Broadening the scope would make things too unwieldy, I think. Tap those other players for their expertise and advice, though, definitely.

One group to think about specifically are the nation's teachers. There has been much handwringing over the last decade since NCLB became law that policymakers at the top have not listened to teachers. Whether that is accurate the perception certainly exists. If teachers believe that their wisdom has not been honored, then the fundamentally important task of implementing the Common Core standards would be undermined. Therefore, whatever entity ends up governing Common Core should definitely seek to create an advisory body (among other advisory bodies) composed of teachers.

- 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"?

I would envision these groups playing the role of supporting cast that I started to describe in #2. Involve them in advisory committees, study groups, and constantly encourage them to provide feedback. Don't give them formal authority to make policy that will govern Common Core. The one exception I could see to that general rule would be to think through whether state boards of higher education should have a formal governing role alongside the other four entities I've mentioned (governors, state legislatures, state chiefs, and state boards of education). Some states have separate higher education boards that wield real authority. If part of the point of Common Core is to help rationalize policy within individual states, then the state higher education boards arguably should have a seat at the governing table.

- 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 CCSS process?

I have a few ideas on this one. I like the idea of a validation committee, separate from the individuals that govern Common Core, weighing in on draft standards and future revisions. Although it could muddy the waters a bit, it might be worth exploring the possibility of multiple validation committees, which would be charged with examining the standards from different angles: one like the current validation committee, and others, perhaps, to examine validity and application of the standards to English-language learners and students with disabilities. I would envision these validation committees

playing advisory roles, so ultimately those individuals governing Common Core in the future would still have to heed the committees' advice for it to have any substantive impacts.

Also, it seems that much of the current conventional reaction to Common Core is that the present math and reading standards are generally well-constructed. An easy way to help insulate that good first round from future dumbing-down would be to create a super-majority requirement for changing the standards. In other words, whatever body ends up governing the effort in the future, it could be constructed to require some quantity more than 50 percent plus 1 vote to change the standards. Admittedly, a super-majority requirement could cut both ways. It would help to limit dumbing-down, but it could also make it challenging to increase rigor in the future.

Finally, although push-back and dumbing-down are potential threats to the Common Core effort, I think those problems will be more challenging to address at the individual state level when these standards are being implemented in individual states and the nation's thousands of schools and classrooms. Even with great standards and a smooth operation governing them, if states themselves do not create the right incentives to use the standards well, then the substantive potential of the standards will be lost. Toch's paper hit this one on the nose in arguing that "policymakers must give educators the incentives they've lacked under NCLB to measure advanced skills."

- 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)?

In general, I think it will be important for the CCSSI's future governing body to avoid finding itself in the position of picking winners and losers in the larger game that will develop around the standards (e.g., curriculum design, teacher professional development, school reform models, etc.). Especially in the short run, here's an area where I'd let the marketplace respond. Certainly, individual states themselves should be free to create their own processes, as they would for procurement or adoption of curriculum materials, to determine whether certain products are valid complements to the Common Core standards. And it might be helpful for the future CCSSI governing body to create some training programs or materials to help states make those determinations. I would simply have the CCSSI itself stay out of the business of saying things like "Curriculum X is consistent with the standards but Curriculum Z is not."

That being said, I do believe that the CCSSI governing body should be involved in determining whether states are violating the "additional 15 percent" standard that they have presently established. I would not take that down to auditing the behavior of local school districts because the task simply would be too huge. But having states demonstrate how they are meeting this standard (or some other percentage, should it be changed in the future) is reasonable because otherwise there would be a great risk of the "core" in Common Core being undermined.

- 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?

Especially in the short run, I would keep federal funding out of it as much as possible. At present, Common Core represents the best attempt yet that the nation has made at adopting more uniform standards across the country. The easiest argument to enflame the fears and passions of opponents would be for critics to assert that the federal government will take over. The question remains, though: If not the federal government paying the bill, then who? Big foundations are an easy second candidate that comes to mind, but they, too, would stir up perceptions that they are simply making Common Core a vehicle to help fill the pockets of their corporate underwriters.

The best possible scenario would be to have the states themselves fund the effort. That may sound unrealistic given the current and likely future condition of state budgets. But still, how much would it really cost, anyway, especially if the next five years is a period of experimentation, study, and a bit of letting things run their course, rather than major new development? If implementation data are made relatively transparent and easily accessible to researchers, for example, a lot of that study will be done without costing any state a penny. There certainly will be a line of scholars and think tank analysts waiting at the door to get their hands on the data that hopefully will be forthcoming. In such an environment, small investments from each state could go a long way. One model, which I discuss in my white paper, would be to emulate what the Great Lakes states did in creating an endowment to support investments in environmental projects. A similar model could fit here.

Finally, a point worth stressing is that if the states really see Common Core as important as they are describing it (and not just a vehicle to support in order to bolster their Race to the Top applications), then they should be willing to put some money on the table to make this thing work into the future.

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

Up in question #3 I noted the possibility of including representatives of state higher education boards in the future governing structure for Common Core. It made me begin to think: There are other such entities that might be considered, too. If I'm not mistaken, I believe some states have separate governing boards overseeing areas such as community colleges and K-12 vocational education. Some states have separate teacher standards boards. There may be other such entities that I am not remembering at the moment. If the focus in the standards is on college and "career ready" then it seems important to include these other such groups in the governing structure.

Along these lines, it would be useful for someone (the current Common Core members, a think tank such as Fordham, or the Education Commission of the States, perhaps?) to do a comprehensive descriptive study that identifies by state all of the entities that have some formal say over education policy. I'm not saying that all of these groups should necessarily have a role in governing Common Core in the future. Still, such a descriptive exercise would help to illuminate some of the state-level institutional complexities that will influence the extent to which the Common Core standards take hold within individual state systems and eventually in districts. Everyone recognizes that educational governance in the United States is complicated and fragmented. Spelling out exactly how seems like a vital exercise in helping Common Core to chart a future course for governance.

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 assessment consortia may undermine the “common” thread that Common Core has begun to cultivate. But to echo my earlier points, if one thinks of Common Core as a project unfolding over the short-, medium-, and the long-term then multiple testing consortia may not be a problem at all. In fact, there may be benefits of having multiple consortia. The DeVito paper indirectly implies as much given that it seems easier to envision the hard work on assessments getting done by smaller more intimate groups rather than larger ones. Further, the presence of multiple consortia would also go a long way toward preventing critics from saying the Common Core really is a federal takeover in waiting.

One way to tally up the scorecard on multiple consortia would be to see things this way. We lose some “common-ness” but perhaps gain some political protection and the potential for innovation in implementation of assessments. In the short run, at least, while all this is taking shape, I think that’d be a nice way to strike a balance. It also makes me really wish that the federal government would have stepped back some instead of designing its Race to the Top funding carrot to push the assessment consortia to be so large. That’s another smart point that DeVito makes.

Perhaps in the future the work of the various assessment consortia will begin to converge. At that point it would be worth considering injecting some more common-ness into the assessment side of the Common Core project. I’d say let’s wait until that day arrives, though, and in the meantime learn as much as we can about how the assessment work plays out in 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)?

At present, I think the nation is really taking baby steps on essentially all of the areas described in this question. If the assessment consortia are destined to be relatively large entities (e.g., 15 states or more), perhaps one could envision creating subgroups within the consortia to try to tackle some of the crucial issues identified here in this question. In other words, under the umbrella of each assessment consortium, why not create smaller (e.g., 2 to 5 states) “implementation consortia” that could work in close quarters and try to address some of the assessment challenges head on? In such a model, the larger assessment consortia could be responsible for developing and making tests available, and convening meetings of the implementation consortia to help states share ideas. The smaller consortia would also make it easier to work around some of the state-level conundrums that Toch advances in his paper, namely, the varying rules and regulations that govern release of test items, among other things. More degrees of freedom become available when fewer states need to work out those details.

As the nation learned with its experience trying to live with NCLB's Adequate Yearly Progress ratings, getting this stuff wrong can do real damage to the perceived validity and utility of assessment and accountability systems. One way to avoid those problems, especially in areas where our knowledge base is still growing, would be to let these smaller groups closer to home in their respective states take their best shots at these difficult issues. Doing so would avoid the path dependence problem that I alluded to earlier and provide the nation with a great set of options, say 5 or 7 years from now, when (and if) we decide to get even more "common" on the assessment side of the effort.

- 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 would not recommend merging these governing bodies for a few reasons. First, each group will already be large (probably too large, even) without creating a larger group to attend to both standards and assessments. Second, although there is a clear relationship between developing standards and assessments, the knowledge base and technical work involved in each—when you really get down to the nitty gritty—is different. While there should be open lines of communication and frequent contacts between those developing standards and those developing assessments, each should feel that its work can proceed relatively unencumbered by the other group. Third, keeping the groups separate would perhaps make it easier for each group to ask difficult questions of the other, which in a way would keep each group more honest. I can envision a sort of creative tension here that could benefit both groups. Finally, circling back to political matters for a moment, keeping the governance of standards separate from assessments would provide yet another layer of protection against the perception that all of this work is simply setting the table for a federal takeover. The more opportunities that those involved in developing common assessments and standards can push back against those potential arguments the better.

- 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?

My answer here generally is the same as my answer to #6 about funding of standards. As much as possible I would keep Washington out of the picture, at least in the short-run. Admittedly, that becomes much more difficult in the context of developing assessments than in developing standards. Assessment development is more expensive, especially if the goal is to have rigorous and challenging assessments. At the moment state budgets are not overflowing with extra money to spend. Still, as I mentioned earlier, if states really believe this work is important then they should be willing to put their own money on the table to sustain it.

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

My answer to #7 applies here, too, I believe.