



Now What? Imperatives & Options for “Common Core” Implementation & Governance October 2010

With the release of the Common Core State Standards in English language arts and math, as well as the current assessment-development efforts tied to those standards, much of the U.S. is on the way toward shared academic expectations and measures for K-12 education—a remarkable development. Yet a thousand “next steps” must be thought through and implemented if these standards and assessments are to get real traction and yield real benefits for American kids, schools and educators in the years ahead.

Will help from the Bill & Melinda Gates Foundation, we at the Thomas B. Fordham Institute have been considering those steps along with a set of thorny issues that will determine the *long-term* viability of this endeavor. What needs to happen in the next five years? A decade hence, who will be in charge of the common standards-and-testing effort? How will these activities be governed? Paid for? And more.

Below you will find **Judith A. Rizzo’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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The Common Core State Standards (CCSS) are in their essence a remarkable piece of work. The quality of these standards in English/Language Arts (ELA) and Math is exceptional due to both the diligence and expertise of the writers and the leadership of the Common Core State Standards Initiative (CCSSI), headed by the Council of State School Officers (CCSSO) and the National Governors Association (NGA). Those of us who have been involved in education reform for many years will have to admit that our cautious optimism – or perhaps our willingness to suspend our well-earned skepticism – has been justified by two happy aspects of this effort: 1. it resulted in a very fine set of standards; and 2. it was the product of a collective effort led by and involving states.

This last point is a defining one for the CCSS. States were involved at every step of the process from the very beginning. Much of the impetus came from state leaders and much of the input into the standards themselves came from state, district and local educators: teachers, university researchers, as well as business leaders and national professional organizations. Parents and the general public were also invited to give feedback and input. The writers reviewed the best standards from across the nation and the countries whose students out perform us. They elicited feedback on a regular basis from states, incorporating concepts, formats, changes, additions and deletions. They also included the opinions and guidance of well-respected content and cognitive development experts. In short, it was a very inclusive process that has resulted in this superior product.

But even a superior product needs to be continually reviewed, improved, and updated. In addition, in their earliest discussions about the initiative, state leaders emphasized the importance of also working together to design assessments, develop curriculum, identify instructional tools, and share successful professional development programs – essential elements that combine to foster implementation. In the past, each state has had to address these on its own, with varied success depending in part on capacity and resources. It is universally understood that without an aligned system that includes all of these elements, any set of standards, regardless of quality, will not lead to improved student achievement. State leaders facing declining resources have noted the benefits that can accrue from a collective effort to accomplish these.

The Fordham Institute is wise to encourage early thinking on whether a permanent structure is advisable to address the two issues raised above: the ongoing review and revision of the standards themselves, and the elements of implementation that states need to address. The five commissioned papers contain much useful information and food for thought when considering this idea.

Let me say at the outset that I do believe that a new independent structure is called for; that it should be separate from the assessment consortia that have emerged, and further, that we not conscript the National Assessment Governing Board (NAGB) to fill that role. I see an entity that would not only conduct serious review and updates of the standards, but also bring states together voluntarily to co-develop any of the elements of implementation that states identify for collective action. I also envision an entity that could commission research and disseminate results.

To briefly elaborate on these, I will follow the format and sequence of the questions posed by Fordham:

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?

I think that a new, separate structure does need to be established, one that is permanent, with an independent governance structure, and that will carry the CCSSI effort to the next level. The question is not whether a current entity can handle the work, but whether any existing entity can assume this as its sole mission with the expertise and resources to make it happen. This work is too important for it to be an add-on or subset of what an organization is already doing, or be influenced by other policies or politics of an organization that serves multiple roles, or whose mission is to represent a particular group.

It is essential to have an executive director and professional staff to conduct the work and carry out responsibilities. The executive director should report directly to the board and communicate regularly with member states.

NAGB? I am convinced by Mark Musick's superior knowledge about NAGB and his conclusion that it should not be distracted from its current role in the National Assessment of Educational Progress (NAEP). Regardless of how well the CCSSI succeeds, it is highly unlikely that all 50 states will soon adopt the CCSS or participate in a state-led assessment consortium, so we will continue to need NAEP, or the next generation of NAEP, to gauge objectively and report how well our students are doing across the country. Currently, and for at least the next decade, NAEP will be our only way to compare achievement across all states; we should not jeopardize that. To involve NAGB in the next iteration of the CCSS could reinforce the concerns of some folks that the CCSSI is a national/federal conspiracy, and that indeed we have moved to national standards and a national test. It would also compromise the NAEP results in states that choose not to adopt and implement the CCSS.

In any case, the new CCSSI work could not become the sole mission of the NAGB, which I maintain to be a critical characteristic of a new governance structure.

Whatever shape this structure takes, the time to act is now. States that have adopted or who will soon adopt the CCSS have already begun to reconsider, for example, their current curriculum or curriculum frameworks. Teachers will soon be facing the need for modified or new instructional resources and teaching strategies and will need focused and targeted professional development. Students will face new demands, and parents will need opportunities to understand the implications of, for some states, much more rigorous content, and ultimately performance. Teacher preparation and evaluation will need to be reconsidered. States themselves have expressed a desire to work together on all of these. I believe that this new structure could facilitate such an effort.

- 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?

As Paul Manna notes in his paper, the CCSSI "resembles an emerging network of organizations united around a common goal." This network that has emerged includes the states that both originally signaled their interest in working together and were subsequently actively involved in the review/feedback loop. The writers both collected feedback from all of the participating states and engaged directly with many state teams on multiple occasions. The continuous and authentic input process assured states that their concerns were heard, taken seriously, and that there was a genuine commitment to involving them in a direct and meaningful way. This engendered a sense of ownership, helped states to think more deeply about decisions they had made about their own standards, gave them insight into the writers' thinking,

facilitated adoption, and helped states think about the kinds of changes that would need to take place to adapt their systems to the demands of the CCSS.

This spirit of collaboration and partnership, so critical to both the substance of the standards themselves and to the commitment of the participating states, should be a hallmark of the new CCSSI enterprise. Its governance structure needs to be focused on the continuation, management and nurturing of that network.

State participation must be entirely voluntary and open to all states. Every participating state should be eligible to derive benefit from the revision of the standards and from any additional resources that may be developed. States should be free to take advantage of some or all collective efforts to build curriculum, identify/design instructional materials, including open-source materials that may become available, and to access research findings, technical support, or other products or services.

It seems to me that we can borrow the wisdom from NAGB when considering the make-up of a governing board of a new CCSSI structure, including its use of sub-committees to address specific issues. However, whereas NAGB has no direct authority over the creation of the NAEP, I concur with Mark Musick that the governing board of the CCSSI structure should have direct authority, responsibility and accountability for the review and revision of standards, amassing evidence, and communicating it widely. It should be committed to transparency.

- 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”?

Higher Ed/employers: The categories of representation on the NAGB are ones that would serve the CCSS governance board, and the chair should be elected from the board annually. The representation and number of the NAGB members seems about right as well as individual board member commitment to not just represent his/her own state or constituency. Business/industry is included on the NAGB and should similarly be represented on the CCSSI board, but the addition of higher education as a separate category is a must: one each from four year institutions and community colleges.

- 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?

While state ownership is critical, this structure would need some independence to buffer it against political pressure to lower standards or appreciably increase them to accommodate multiple interests and competing demands. This does not mean independence from solid research, evaluation, and evidence. Any decisions to significantly alter the standards up or down must be based on solid research and evidence that is made public. We cannot slip back into the mile-wide-inch-deep standards that have resulted from an emphasis on consensus-building to the detriment of clarity and focus. The CCSS writers managed to incorporate the best recommendations into each successive rewrite, but maintained their underlying commitments to rigor, clarity and research. That certainly cost the allegiance of some states that held onto their own unique sequence of skills or wording, but such a level of scrutiny, diligence and steadfastness must be maintained in future iterations.

- 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)?

As mentioned earlier, I suggest that the mission and role of this new entity should be twofold: 1. review and revision of the CCSS; 2. development of high quality tools and resources to foster their implementation in states.

Unlike the NAGB, the CCSSI governing board should have direct authority and concomitant responsibility for the review/revision of the CCSS, for the production, commission, and dissemination of relevant products and resources, and should be held publicly accountable for the work. External evaluations of process, products, services, quality and effectiveness should be ongoing and adjustments made accordingly. Research and evidence must rule the day.

On the issue of monitoring fidelity of implementation at the state or district level? Not a chance. I doubt that any state would voluntarily subject itself to that. Monitoring curriculum alignment in states? Also no. But producing aligned curricula, instructional materials, teacher training, and professional development modules that states can voluntarily use? Absolutely yes. Conducting a curriculum audit at the request of a state? Yes, again. I would add to those efforts, the creation of open-source materials/products and technical assistance. States should be able to request these kinds of activities and be an integral part of their development, just as they were in the original CCSSI.

States who join this effort will have a set of standards in common and a set of aligned products and services that will have been developed in common. Each state will decide the extent it wishes to avail itself of these. Each state will need to make a calculation of how it would benefit from participation in this common effort. These include cost as well as political benefits. States spend millions of dollars on developing their own standards, assessments, and curriculum. The New England Common Assessment Program (NECAP) example points to the cost benefits of states working together on these. NECAP member states also point to the “political cover” that a collective effort provides. Similar benefits would accrue to CCSSI participating states. These are among the benefits that states themselves identified at the very outset of the CCSSI and that led so many of them to sign on to this effort.

- 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?

Financing – I think the CCSSI and its work should be funded by the federal government, private sources, and participating states to ensure joint ownership, commitment, and responsibility. For example, federal funds could be used for research and evaluation; private funds for staffing and governance costs; and state contributions could be pooled for development of curriculum, instructional materials, etc. This will require both new investments but also a refocusing and repurposing of current funding.

Here's an example of how current federal dollars could be deployed to support the work of the new CCSSI: the federal government already funds the network of Regional Education Labs (RELs) throughout the country and the Institute of Education Sciences (IES) sets goals for them. We are just ending the 2006-2010 REL contract period, and the IES is preparing to set priorities for the next few years. Aligning those with the CCSSI would make great sense. Some of the RELs have developed considerable expertise in the areas important to state implementation of standards and the reports they issue are already required to pass a rigorous external peer review to ensure quality. Many states have long-standing and trusted relationships with their RELs and would welcome their involvement in this effort.

Also, IES already funds 15 National Research and Development Centers. Aligning their work to address research and evaluation issues that will be so essential to the success of the CCSS in states would be another way to focus current federal dollars. The creation of the new CCSSI structure is an opportunity to coordinate all of our collective resources and penetrate some of the funding silos.

While implementing standards that may be much higher than some states currently have will certainly cost money, there will be cost savings that will balance some of it out. For example, participating states will not have to go through their own internal processes to review and revise standards on a regular basis. This effort alone will reduce demands on already strained resources and staff. States would also have the opportunity to pilot newly designed curriculum units, aligned professional development modules, and other tools and resources such as virtual coursework, open source materials, etc. All these will allow states to target limited resources more wisely and efficiently.

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

Over the long haul, if a newly created CCSSI organization delivers quality services and products to states, they will participate. It's that simple. I think that states should begin with at least a three-year commitment to demonstrate their support and willingness to actively engage. But we all know that even a well-intentioned MOU will not guarantee future participation if states are not satisfied with the benefits of membership. So what will ensure long-term commitment? Products and services that meet states needs.

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*?

The two K-12 assessment consortia have been formed in compliance with the federal RTTT requirements. Each was required to have a minimum number of governing states. Twenty-eight states have signed on to that: 11 in the Partnership for the Assessment of Readiness for College and Careers (PARCC) consortium and 17 in the SMARTER Balanced Assessment Consortium (SBAC). These states will be in a position to influence every aspect of design, and will ultimately decide individually whether to adopt the assessments. An additional 18 states elected to participate in one or both consortia without the benefit of being able to influence the outcomes. That's a lot of states involved in an effort that just a few years ago no one dreamed could actually happen. The best case scenario is that we would have a variety of assessment options that are all high-quality, match the standards, set rigorous achievement

levels, and a majority of states will use. We will always have NAEP to look across all the states for additional comparative data. I don't think that we can expect much more governance than that at this juncture.

The assessments that result from these efforts must be aligned to the CCSS, and both consortia have a stated commitment to the development of curriculum frameworks that are similarly aligned. The new CCSSI could review both the assessments and the curriculum for consistency with the CCSS. An external objective look would be very beneficial to all and would help guide states that are looking for a way to compare.

- 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 will need to focus first and foremost on the creation of the assessments, and all related activities: test specs, cut scores, publishing results, adaptive technologies, etc. I don't see them rating schools; that goes way beyond their purview. "Common" can't apply to every aspect of assessment any more than it can for any element of CCSS implementation. States will continue to differ in many ways.

- 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 doubt that only one state consortium will win the competition; too many states are involved in both with a real commitment to the enterprise. Plus, states need options and the country as a whole needs more than one effort. In any case, I would not recommend that we consider merging a CCSSI and consortium governing board. First of all, it would be an enormous undertaking; second, it would dilute the primary mission of each; third, states who elect to use their own assessments would effectively be left out; and lastly, because of the amount of federal funding for the assessment consortia, the new CCSSI, as well as NAGB/NAEP/IES, we would be veering way too close to one "national" or "federal" system. That would turn off too many states.

- 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?

Going forward, continuing additional federal dollars for assessment would certainly help. If the assessment consortia succeed in creating web-based tests and other efficiencies of scale kick in, the costs may decrease over the years. But many schools still lack the technological capacity to take advantage of some of what's already possible for testing. The federal government could certainly increase funding in that area. Federal dollars for research and evaluation of assessment will always be the greatest funding source for those activities, and that should be increased and carefully targeted.

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

In conclusion, we should take heart that so many states have come together in a common effort, and we should do everything possible to nurture that spirit of collaboration. These new networks that have emerged will need to be studied closely, for they open a new chapter in education for our country. It will be very interesting to watch.