

Now What?

*Imperatives & Options for “Common Core”
Implementation & Governance*

by

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executive summary

Over the past year, the nation's governors and state school chiefs have achieved laudable consensus around a set of math and English standards, developed voluntarily and without federal involvement through the Common Core State Standards Initiative (CCSSI). Most states have signed on to them. More recently, the states have again teamed up—this time with federal funding—to develop new assessment systems that align with the common standards.

What happens next? This is an enormously consequential question for American education, because charting the future of the Common Core (and the forthcoming assessments) is inseparable from some fundamental decisions about how our K-12 education system will be organized and governed. Do we continue forward as we have in the past, with new academic expectations and tests but little else that's different? Do we entrust "implementation" of the Common Core entirely to individual states, districts, and the marketplace?

Or do we overhaul and fundamentally reconfigure our education system? Do we create a powerful interstate body to ensure that the new standards are implemented in actual classrooms and real lesson plans in schools across the country? Or do we seek an altogether different strategy?

We asked experts from across the education sector to respond to a dozen perplexing questions on the future of the Common Core (see Appendix A for a partial list of respondents). We synthesize some of their collective input below. All final judgments, however, are solely those of the authors.

We agree with Andy Rotherham that the three "essential elements" of any long-term Common Core governance arrangement are "independence, representation, and transparency." But what form should it take and how should it evolve?

After examining the many tasks that must be successfully undertaken if the Common Core standards are themselves to succeed, this paper lays out three different governance models:

1. "Let's Become More Like France." We picture a powerful Common Core governing board—probably via a new compact among participating states—to oversee the standards, assessments, and many aspects of implementation, validation, and more.

2. "Don't Rock the Boat." We keep the Common Core footprint as small as possible. An existing group is charged with updating the standards five or ten years hence, but otherwise everything is left to states, districts, and the market.

3. "One Foot before the Other." This middle ground foresees an interim coordinating body that promotes information sharing and capacity building among participating states, which remain in charge of implementation. By the time the Common Core needs revising, this interim body may evolve into something more permanent or may itself make recommendations for long-term governance.

In the end, we call for a version of Model #3—a Common Core Coordinating Council ("4C," or even "Foresee")—that plays a temporary information-sharing and facilitation role but might morph into something more ambitious (and more permanent) over time.

introduction

Just a year ago, it was impossible to imagine the rapidity and breadth of adoption of the new Common Core standards. With almost forty states now signed up, serving more than 80 percent of the public school population, we can confidently declare that the U.S. is finally on the road to national standards for its schools.

Anyone who follows Fordham's work knows that we see this as an essential move in the right direction for American education. For the better part of a decade, we've been arguing that America's patchwork system of standards and tests simply isn't able to meet the needs of a big, modern country in a rapidly changing world. Nor were we confident that many states would ever get around to raising standards on their own. But we were nervous until we laid eyes on the actual Common Core documents—because what would be worse than no national academic standards would be shoddy national standards.

Fortunately, the Common Core turned out to be a commendable product,¹ a significant improvement in academic expectations and clarity for the vast majority of states. These states deserve credit for banding together (with Uncle Sam's encouragement, yes, but no direct involvement) and producing some very fine documents.

Although that represents a major accomplishment, it's also just the beginning of an arduous process. Standards describe the destination that schools and students are supposed to reach, but by themselves have little power to effect change. Much else needs to happen to successfully journey toward that destination. One important element, already underway, is

the development of new assessments that are aligned with the standards. This process has just commenced via two consortia of states that will spend the next four years (and hundreds of millions of federal dollars) building tests—fancy, modern “assessment systems,” at least if all goes well—that will replace the tests that states currently use. This is potentially an even bigger development, because what's “on the test” is the real standard, for better or worse. Our fingers are again crossed in the hope that this effort, too, will turn out well.

— *Standards describe the destination that schools and students are supposed to reach, but by themselves have little power to effect change. Much else needs to happen to successfully journey toward that destination.*

Fordham has been engaged in various stages of this evolution, examining how other countries manage the process, reviewing drafts of the standards, weighing in on the wisdom (and risks) entailed in making this big shift, and contemplating the repercussions for federal policy. But we're particularly interested in a question that so far has received little attention from anyone else: How will this Common Core effort be *governed* over the long term? Who will “own” the standards ten or twenty years from now? Who will be responsible for updating them? Whose job is it to make sure they don't get corrupted or co-opted over time?

This issue might seem esoteric, almost philosophical, in light of the staggering amount of work to be

¹ Carmichael, S. B. and G. Martino, K. Porter-Magee, and W. S. Wilson. 2010. *The State of State Standards—and the Common Core—in 2010*. (Washington, D.C.: Thomas B. Fordham Institute).
http://www.edexcellence.net/index.cfm/news_the-state-of-state-standards-and-the-common-core-in-2010.

done right now to make the standards real and the assessments viable. But we find it essential—not just for the long-term health of the enterprise, but also to allay immediate concerns that these standards might be co-opted by any of the many factions that want to impose their dubious ideas on American education. You don't have to be a conspiracy theorist to worry about this possibility—and we think a viable governance arrangement is the best bulwark against such an outcome.

— *The Common Core standards and forthcoming assessments are intended to alter what American schools teach and what children learn—and to do so in thousands of districts and millions of classrooms.*

In one sense, America is headed into a constitutional moment, moving beyond the “Articles of Confederation” era in standards-based reform. Something similar happened before. In the late 1980s, when the National Assessment of Educational Progress (NAEP) was overhauled and modernized—so that, for example, it would produce state-by-state results—it was evident that the country had no suitable mechanism to govern “the new NAEP.” (The old NAEP had essentially been run by private testing contractors.) So the National Assessment Governing Board (NAGB) was created, largely from scratch. Like any new constitutional creation, it then needed to establish principles, procedures, and precedents, all of which happened and most of which have worked rather well, as a recent paper by Mark Musick makes clear (see below).

Today we face a similar situation, but on a far larger and more consequential scale. Whereas NAEP is a relatively low-impact external audit of educational performance, the Common Core standards and

forthcoming assessments are intended to alter what American schools teach and what children learn—and to do so in thousands of districts and millions of classrooms. How this is governed over the long haul matters a great deal. Yet once again we find no suitable mechanism in place.

We're not throwing stones. Nobody is at fault; it is simply a fact that the U.S. does not have an obviously appropriate structure for managing this kind of education activity across state lines but without federal domination. Either something new needs to be developed or something that exists needs a major makeover, and/or these diverse yet related activities need to be housed in multiple locations.

Most experts agree (and we concur) that it is crucial to preserve the independence from Washington of these new standards and assessments—Mark Schneider, for example, believes “in the continued centrality of the states in any transition from the broken system we have now”—yet it's folly to suppose that the federal government will have nothing whatsoever to do with them. Consider, for example, the gap-closing and achievement-boosting efforts we associate with No Child Left Behind; the equity and civil rights issues that arise under any high-stakes accountability regime; and the ways in which NAEP itself will and won't intersect with the Common Core and its new tests. Federal dollars may also be involved in various aspects of this venture. But how can we safeguard the standards and assessments from inappropriate influence and intervention by Uncle Sam? How do we get this right in the upcoming reauthorizations of the Elementary and Secondary Education Act (ESEA), the Individuals with Disabilities Education Act (IDEA), the National Assessment, and the Institute of Education Sciences?

Earlier this year, with financial help from the Bill and Melinda Gates Foundation, we set out to spark

some smart thinking about this thorny topic. We commissioned five background papers that address various aspects of the governance of the standards and assessments themselves. (The papers are available on our website, at http://www.edexcellence.net/index.cfm/news_common-education-standards-tackling-the-long-term-questions.) Here are brief synopses:

>> “The Oversight of State Standards and Assessment Programs: Perspectives from a Former State Assessment Director,” by Pasquale “Pat” DeVito, describes how states currently “govern” their standards and testing programs. (DeVito now works at Measured Progress and directs that firm’s work on the Massachusetts Comprehensive Assessment System (MCAS); he formerly served as Rhode Island’s testing director.) He explains that most states handle this “administratively,” usually within the state education department and under the policy eye of the state board of education. That’s certainly the case in the states that DeVito profiles (Massachusetts, Kentucky, Michigan, and North Carolina). Perhaps most relevant to the Common Core governance challenge is his description of the New England Common Assessment Program (NECAP), a consortium effort that pulls together four states for a shared assessment. One might think of it as a miniature version of the Common Core, but delicate and complex governance issues have arisen even on this small scale, and challenges remain. (For example, test results are reported in and for individual states, not across them, even though all four use the same test.)

>> “Networked Governance in Three Policy Areas with Implications for the Common Core State Standards Initiative,” by Paul Manna, Associate Professor of Government at the College of William and Mary, describes a little-known approach to gov-

ernance (to us at least): “networks” of varying levels of formality, sometimes involving interstate arrangements, sometimes multiple agencies in a community, state, or region. Manna profiles three of these networks and poses key questions about how they are structured, how their memberships are defined, how their decisions are made, and how their expenses are covered. He also examines implications for the Common Core—and how to address “the looming federal presence.”

>> “E Pluribus Unum in Education? Governance Models for National Standards and Assessments: Looking Beyond the World of K-12 Schooling,” by Patrick McGuinn, Associate Professor of Political Science and Education at Drew University, looks outside the education sector for examples of national standards in operation. He sketches a number of examples, from the Uniform Law Commission and Financial Accounting Standards Board, to various initiatives by the federal government that are not directly managed from Washington (e.g., the “Energy Star” rating system for energy-efficient products). Perhaps most interesting is his discussion of “interstate compacts” (some of which exist in education but more outside of it) and the considerable potential of such an arrangement to govern Common Core over the long haul.

>> “What Can the Common Core State Standards Initiative Learn from the National Assessment Governing Board?,” by Mark Musick, longtime head of the Southern Regional Education Board and former chairman of NAGB, now at East Tennessee State University, examines the history and functioning of NAGB and finds therein a number of lessons that may apply to Common Core governance in the years ahead. These include independence, staff-

² Toch, T. 2006. *Margins of Error: The Education Testing Industry in the Era of No Child Left Behind*. (Washington, D.C.: Education Sector). http://www.educationsector.org/usr_doc/Margins_of_Error.pdf

ing, resources, organizational culture, and more. He also concludes—quite firmly—that, while valuable lessons can be drawn from the NAGB experience, NAGB itself is not the proper entity to oversee the Common Core.

>> “How Will the Common Core Initiative Impact the Testing Industry?,” by Tom Toch (Executive Director of the Association of Independent Schools of Greater Washington, co-founder of Education Sector, and a veteran education journalist), and former Newsweek reporter Peg Tyre, (now a Spencer Fellow at Columbia University’s Graduate School of Journalism), picks up on an earlier paper that Toch wrote about the U.S. testing industry.² Here, the authors forecast how the Common Core assessments will evolve and what this means for that industry. The paper is especially useful in framing key challenges that the nascent assessment “consortia” will face as they move forward, particularly given the ambitious multiple purposes that the U.S. Department of Education wants these assessments to fulfill.



With background papers in hand, we posed a dozen tough questions to two dozen smart people—all of them veterans of countless education-policy and education-reform wars—about what the nitty-gritty governance arrangements might look like (see Appendix A for a partial list of respondents). And we got back incredibly varied answers. (Some of their comments are included throughout.) Our respondents seemed to inhabit different planets in the policy cosmos.

They lacked consensus not only about the details, but even about the need for “governance” at all, not to mention its timing. Some said to wait, to let the

Common Core effort play itself out before thinking about ownership of the standards. Others urged the nation to settle these issues immediately. Some wanted to entrust oversight to existing organizations. Others yearned to create something from scratch. And on it went. There was, quite simply, no agreement.³

Paul Barton, for example, declares that “the prime problem...is getting the bandwagon started. It must get traction now; otherwise, we run the risk of not being able to pull it.” “This is very urgent,” insists Eric Smith. On the other hand, Mark Musick says “governance of the Common Core State Standards is not a front-burner matter. Trying to ‘solve’ the standards governance problem before there is a standards governance problem will be a mistake.”

“Something new needs to be created” is Jeb Bush’s conclusion, while David Driscoll asserts that “CCSSO and NGA have established the Common Core State Standards. They own them and should govern them.” Yet Michael Kirst favors “an organization independent of all governments, with operations financed by an endowment.”

Similarly discordant advice poured in on issue after issue. Amidst this cacophony, we began to discern that one reason for the lack of consensus is that we *ourselves* had not been clear about what exactly needs to be “governed.” Is it just the Common Core standards? Is the question simply who should be responsible for revising and updating them? Or would some new or existing organization also oversee the assessments? What about “implementation” and all that it entails—developing curricular materials, training teachers, disseminating achievement results, providing online learning tools, creating a robust accountability system, and so on?

³ Our questions and a representative sampling of responses—several respondents preferred to remain anonymous—can be found online at http://edexcellence.net/index.cfm/news_now-what-imperatives-and-options-for-common-core-implementation-and-governance.

Nor had we properly framed the governance questions we were posing within the larger “system design” issues in which they are inevitably embedded. Without a clear mental model of the future workings of American K-12 education, it’s difficult to picture how the standards and assessments themselves should be governed, managed, studied, funded, etc.

In other words, how you think about the governance of the Common Core and its assessments ten or twenty years hence is hard to disentangle from how you expect the system itself to operate. In particular, does “implementation” simply happen state-by-state (and district-by-district)? To what extent could or should it happen nationally? We need to imagine some potential models and ponder their implications for standards and assessments.

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That’s what we undertake in the following pages. We start by sketching nearly everything that needs doing—either in some sort of interstate fashion or by individual states, districts, and the market—if the new standards are to be more than words on paper. Then we set forth several versions of who *should* do these things—and what that implies for governance of the enterprise.

PART I: what needs doing?

Even before states started to adopt the Common Core standards, some analysts were imploring policymakers to think about the many challenges of implementation. (We've already spotted a couple of good "roadmaps" for what that might entail—including from our friends at Achieve.) It's not hard to understand why. Several states (California and Indiana come to mind) have had excellent standards on the books for years, yet haven't seen many changes in teaching and learning or in student achievement. Meanwhile, others—notably Massachusetts—spent the last decade rocketing ahead of their peers, apparently because they implemented their standards effectively.

So when people demand that we "get implementation right," most of them probably envision a set of actions akin to what the Bay State has undertaken. That's a big assignment and, cautions Mark Musick, "will be messy." Here are the major activities that we believe are key elements of robust implementation, particularly in the next five years:

1. Developing and deploying, then protecting, solid—and aligned—assessments. It's hard to imagine anybody paying attention to the Common Core standards if they aren't the basis for the tests that drive accountability (for schools, teachers, students, etc.). Thankfully, this work is already underway, with federal financial support. There are a million details to figure out when it comes to launching new assessments, from their technical quality and validity, to the inclusion of special education students and English language learners, to their "cut scores," to their relationship with "interim assessments," just to name a few. There are political concerns, too. Since there is, in former U.S. Secretary of Education, and Fordham trustee, Rod Paige's words, "little doubt" that these assessments "will show vast areas of our public education system failing," it is critical to "protect this centralized and fundamental evaluation system from

being subtly, but inevitably, compromised...when that process highlights the warts of the system."

— *It's hard to imagine anybody paying attention to the Common Core standards if they aren't the basis for the tests that drive accountability.*

2. Making the most of the Common Core achievement data. One of the great benefits of common standards and assessments is the potential for comparing schools across state lines. But there's much to sort through. How should school-level (and within-school) results be reported? And to whom? Parents? Administrators? Teachers? How can student performance data be fed into teacher evaluations in ways that are revealing yet fair? Can this flood of data launch a golden age of productivity and applicability for education research? Here, history is a good teacher, notes Paige: "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." Andy Rotherham adds: "The real power of common standards is the ability to have common information across geographies and common yardsticks. Doing so is the most plausible strategy for rationalizing the incoherence that plagues the education field right now."

3. Ensuring real accountability. Former Massachusetts education chief David Driscoll, who also serves as a Fordham trustee (as well as chairman of NAGB), contends that the Bay State's graduation requirement, even more than the exemplary academic standards on which it was based, is what drove real gains in student achievement. Because students had to pass MCAS (the state assessment) in order to receive a diploma, and because the state stuck to its guns, schools got

serious about teaching everyone. But that has not been the story everywhere. No Child Left Behind demands a measure of accountability from schools, but what about from students? What consequences for schools should be linked to the Common Core results? What interventions should be applied? And how do state and local responsibilities in this sphere mesh with future federal Title I demands? Ignoring these questions will result in what Andy Rotherham calls the “health club” phenomenon, “where many or most states say they’re in the club but few are actually doing the expected workouts.” An anonymous respondent warns against the “check the box” syndrome whereby the standards become a de facto end in themselves, rather than a foundation for the kind of implementation that fundamentally changes both teaching and learning.

— *It doesn't make much sense to raise our sights for what students should know and be able to do while maintaining mediocre expectations for teachers. We need to raise the bar.*

4. Developing tools for teachers. Teacher groups have long complained—rightly, we think—that most instructors are left to figure out how to “implement” standards themselves. They are simultaneously drowning in a sea of materials (from textbooks to online lesson plan banks to modules from advocacy groups) and living in a curricular desert. What they want is a voluntary but thoroughly crafted curriculum that brings life to the standards, along with suitable textbooks, digital materials, supplemental readings, and so forth that they can use in their daily practice. They also need—and deserve—help from disinterested expert evaluators regarding which of the many instructional materials that will be described (usually by their vendors) as “aligned” with the Common Core are truly matched to its cognitive expectations

and sequencing. Equally essential in the classroom are interim assessments (that break the full-year standards down into manageable but explicit chunks) and plenty of training in how to use all of this. The Hunt Institute’s Judith Rizzo observes: “State leaders facing declining resources have noted the benefits that can accrue from a collective effort” to “develop curricula, identify instructional tools, and share successful professional development programs—essential elements that combine to foster implementation.”

5. Building online options for students. The Common Core standards are coming of age at a time when we have the possibility of skipping traditional classroom instruction altogether—and certainly of augmenting it. With online and hybrid models taking shape and showing increasing sophistication and promise, there’s an opportunity to develop learning modules that allow students (especially older ones) to engage with the Common Core directly and that cumulate toward proficiency—and college and career readiness—as defined in relation to the Common Core and the new assessments.

6. Strengthening teacher licensure requirements as well as performance evaluations. It doesn’t make much sense to raise our sights for what students should know and be able to do while maintaining mediocre expectations for teachers. We need to raise the bar dramatically in terms of the content mastery expected from incoming teachers, as well as their readiness to impart to students the ambitious cognitive skills expected by the Common Core. (Revamping its teacher test—and setting the “cut scores” relatively high—may be another reason that Massachusetts saw the gains that it did.) But certification is only the start—and not necessarily predictive of classroom effectiveness. Hence evaluations of teacher performance, particularly during their first three to five years in the classroom, should also be calibrated to their success at equipping their pupils with the skills

and knowledge embodied in the Common Core. Rod Paige notes that the new student assessments may also reveal “major deficiencies in the strength of our human capital resource in education.”

Over the longer term, a number of additional actions will be needed to protect and improve the “architecture” of the standards (and assessments) themselves. Here are the most prominent:

7. Enlisting other key sectors. Though the Common Core standards espouse “college and career readiness,” higher education and employers had relatively modest involvement in their creation. For these—or any other—standards to develop real traction, the “real world” that K-12 graduates enter must take them seriously. “Both K-12 and postsecondary educators must realize,” cautions Paul Lingenfelter, “that the demands of the external world—not the practices and propensities of educators—are driving the need for improvement.” A legislator says of her own state that “the input from business leaders stressing that future jobs will require higher levels of education has been instrumental in both establishing and implementing reform efforts.” And it may turn out that the standards themselves need to be tweaked and adapted in order for students meeting them to be truly suited to the expectations of colleges and employers. This won’t necessarily be simple. Paul Barton notes that college entrance requirements vary dramatically from one campus to the next. Lingenfelter insists, however, that “college and university faculty...fundamentally share *common* standards for foundational knowledge and skill in mathematics and English.”

8. Encouraging greater public buy-in. Though the K-12 sector is buzzing with interest and anxiety regarding the new standards and assessments, John Q. Public is barely aware of them. Ensuring that these standards gain real traction requires that they seep into public consciousness, indeed into the culture

itself (much as, say, passing the “A-levels” or the “baccalaureate” has percolated into the cultures of England and France). For students and educators to take the standards seriously means that parents, voters, taxpayers and opinion leaders as well as educators must take them seriously. How is this to be accomplished? Parents could be involved, argues Neal McCluskey, if “[s]chools adopting [the standards] would pay to be able to say that they are recognized as using those standards. That, in turn, would attract parents...” Paul Manna warns: “If teachers believe that their wisdom has not been honored, then the fundamentally important task of implementing the Common Core standards would be undermined.” This piece is particularly important, explains a legislator, because “having buy-in from the broadest group possible will help ensure that any attempted ‘push back’ meets resistance from several fronts and different stakeholders (particularly, the end users).”

9. Launching research, validation, and evaluation studies of the standards, their implementation, the assessments, and student performance in relation to them. Authors of the Common Core assert that students attaining these standards will be “college and career ready.” But we cannot know this for certain unless actual outcomes are investigated and unless students are tracked over time. How will we know, for example, in what sorts of careers (and, for that matter, colleges) they are truly prepared to succeed? How will we know for sure that meeting the standards of grade 5 prepare you to succeed in grade 6? Or whether passing scores on the new tests are correctly set? This “competent professional review,” in the words of Paul Barton, is essential, as is maintaining “as broad participation as possible,” which in turn will keep standards high. A state legislator adds that, in terms of ensuring the standards are well implemented, “it will be helpful, if not critical, for state policymakers to know if potential standards are effective.”

10. Updating and revising the standards, and perhaps adding other subjects. There are bound to be some glitches and inconsistencies in the Common Core standards and, even if there aren't, they'll need periodic updates. (David Conley calls the current standards "version 1.0.") Their essence may not change much but the suggested readings—and exemplary student work—surely will. Validation studies and longitudinal tracking are also bound to invite revisions, as will the responses of universities, state K-12 systems, and employers. And what about ad-

ditional subjects? Science standards are already on their way from Achieve and the National Research Council. What about history, perhaps even economics? Who will make these decisions? Conley adds that "science at a minimum remains [to be developed and added]...and it is not too far fetched to expect other subject areas to strive toward having national standards."

That's a lot to tackle. But whose job should it be? Let's consider some options.

PART II: who should do what?

Here we describe three possible models for tackling the items on that ambitious to-do list.

1. “Let’s Become More Like France.” We picture a powerful Common Core governing board—probably via a new compact among participating states—to oversee the standards, assessments, and many aspects of implementation, validation, and more.

2. “Don’t Rock the Boat.” We keep the Common Core footprint as small as possible. An existing group is charged with updating the standards five or ten years hence, but everything else is left to states, districts, and the market.

3. “One Foot before the Other.” This middle ground foresees an interim coordinating body that promotes information sharing and capacity building among participating states, which remain in charge of implementation. By the time the Common Core needs revising, this interim body may evolve into something more permanent or may itself make recommendations for long-term governance.

Let’s give these options a closer look—including how each might be financed. None of these models is fully developed, of course, and many other strategies and variants can readily be pictured. The purpose of this exercise is to illustrate possibilities and spur thinking and discussion about them.

Model #1:

Let’s Become More Like France

Imagine a powerful new interstate governing board that oversees most everything on the implementation to-do list (see Table 1). It oversees the standards and tests but also wades into accountability issues (setting uniform “cut scores,” identifying failing schools, prescribing interventions); develops curricular materials; creates teacher training modules; reviews textbooks and intervention programs to ensure alignment with the standards; revamps teacher licensure requirements; pays for online content linked to the Common Core; and launches an aggressive research and evaluation enterprise to determine which of these myriad efforts are working and which need to be adjusted. States voluntarily cede authority over these issues to the “common” effort, although state participation in it remains voluntary.

The governance structure might resemble the Interstate Insurance Compact,⁴ with at least one representative from every member state on the larger board and a smaller group charged with day-to-day decision making. Given the nature of the U.S. education system and the complexity of the tasks involved here, any such arrangement would also need to incorporate advisory bodies that include numerous “stakeholder” groups and experts.

⁴ As described by Patrick McGuinn, “The Interstate Insurance Compact came into existence in 2004 when it was adopted by the legislatures of Colorado and Utah, but in accordance with its by-laws, it did not become operational until 2006 when it met one of two threshold goals: twenty-six member states or the ratification by states representing 40 percent of insurance premium volume. The Compact is governed by the Interstate Insurance Product Regulation Commission (IIPRC), which includes one member from each signatory state. A management committee of fourteen members supervises day-to-day operations of IIPRC...Its mission is to develop uniform product standards and provide a central point of electronic filing for a variety of insurance products (including life insurance, annuities, disability income, and long-term care insurance). Today, thirty-six states take part in the Compact, and as of summer 2009, the commission had adopted fifty uniform standards for insurance products...In order for a uniform standard to be adopted, it must receive the approval of two-thirds of the management committee and then two-thirds of the states that participate in the Compact. The Compact’s...regular operations are funded by registration and filing fees levied on participating insurers...It promotes uniformity through application of national product standards that include strong consumer protections. Significantly, however, even once a uniform standard has been adopted, states may opt out at any time for any reason by repealing the initial compact legislation. Under certain conditions, they may also opt out by state regulation.”

Table 1: **Our Three Models vs. the Implementation To-Do List**

Under each model, which of these items would be handled by a central governing body?

	MODEL 1: Let's Become more Like France	MODEL 2: Don't Rock the Boat	MODEL 3: One Foot Before the Other
Developing and managing aligned assessments	•		(Coordinate)
Making the most of the Common Core achievement data	•		(Coordinate)
Ensuring real accountability	•		(Coordinate)
Developing tools for teachers	•		(Coordinate)
Strengthening teacher licensure and certification requirements	•		(Coordinate)
Building online options for students	•		(Coordinate)
Enlisting other key sectors	•		•
Encouraging greater public buy-in	•		•
Launching R&D, validation and evaluation studies of the standards, their implementation, and student performance	•		•
Updating and revising the standards, and perhaps adding other subjects	•	•	•

The governing body is financed via fees from member states (participation fees, testing fees, etc.) as well as grant dollars from private and public sources. Eric Smith is specific: “a minimal state membership fee based upon state student population size.” Jeb Bush notes that such dues are commonplace with membership organizations. Mike Kirst, on the other hand, recommends raising a sizable private *endowment*, the

income from which will be “sufficient to fund most operating costs.”

Pros include: It’s orderly, rational, integrated, and comprehensive. It places the states clearly in charge while cutting through some of the layer-cake problems and governance complexities of K-12 education, and would likely attract high-status people who would

take it seriously. It eases the problem (noted by Eric Smith) that some states don't themselves have the legislative authority to oversee things like curricula or instructional materials.

Cons include: It is a heavy political lift for the U.S.—disruptive, scary, risky. It tends to “governmentalize” much that is now done via the market. Standards, content, curriculum, teacher quality, instruction, and accountability are in danger of getting lost under controversial structural and political changes, interest group agonies, and the fresh risks of stasis, bureaucracy, and conventional thinking that accompany any new quasi-monopoly. Nor does it necessarily clarify many federal policy issues (e.g., the intersection of ESEA funding-and-accountability expectations with Common Core standards and tests). And because funding hinges on state participation, it runs some risk of lowest-common-denominator and nonjudgmental activities in order to keep states on board. As Jeb Bush observes, “the process for development of [the] Common Core standards was a voluntary, state-driven process that may not be easily transferred to...a more nationalized, quasi-government entity.” But Bush also offers this possible solution to the lowest-common-denominator problem: “An executive committee whose membership would be determined on outcomes (i.e., top ten states that show results in student progress, performance, growth with low-performing students) could serve as a veto of decisions that lower standards and rigor.”

Model #2:

Don't Rock the Boat

Under this approach, no new structural arrangements are contemplated and the Common Core initiative keeps a small and rather inconspicuous footprint for the indefinite future. The current “marble cake” of local, state, and federal policies and governance remains much the same. No Child Left Behind eventually gets

a makeover, but states continue to vary enormously in what they expect of schools and kids (“cut scores” are different, even on common tests; accountability systems are different; interventions are different). Teacher training, curricula, instructional materials, and education technology also vary widely—some are terrific, others not, but all remain products of market forces and their uses are determined by local preference, variable state supervision (and capacity), and multiple funding streams. All Common Core does is update its own standards every five or ten years or so.

The National Governors Association (NGA) and/or Council of Chief State School Officers (CCCSO) could handle such updating themselves and some think they should. Says David Driscoll: “CCSSO and NGA have established the Common Core State Standards. They own them and should govern them. Those two organizations may not have been careful in what they wished for but now the responsibilities going forward belong to them.” CCSSO, at least, seems to agree, since according to its executive director Gene Wilhoit, “Deciding on next steps soon is very important, but in the interim, the existing structure will stay in place.” (In time, however, Wilhoit favors “a new structure that incorporates existing organizations, pieces of the structure that led the Common Core work, and lessons learned from other organizations’ governance.”)

But there are other options, too. An anonymous respondent wondered about a reconstituted and re-energized Education Commission of the States. Pat DeVito sees no need for more oversight than this: “Why would further governance be needed between the development of the standards and their revision at some point in the future?” After all, “if ‘the standards are the standards’ then any dumbing down would be the result of the use of the standards, not the standards themselves.”

Note, though, that some other entity—perhaps the National Academy of Sciences—would have to shoulder responsibility for R&D and validation initiatives to see what aspects of the standards need changing, and it would need to raise considerable money from public or private sources to support this agenda. As for the Common Core standards themselves, when revisions are warranted, the host organization(s) would raise the necessary funding. It might be federal. Rod Paige suggests that “the relationship between the federal government and CCSSSI governance should resemble that between the federal government and NIH...” Paul Barton notes that private financing comes with strings, too: “The major foundations are so large and so powerful in using grants to pursue their strong policy agendas that independence, as a practical matter, may not be complete, even without government funding.”

As for assessments, the new consortia that are developing them will administer them, much as NECAP does today (see paper by Pat DeVito). They might perhaps evolve over time into more stable entities akin to the College Board, outsourcing most of the work to testing firms (as NECAP does to Measured Progress and the College Board does via ETS). But the assessments would stay separate from the standards, and so would their governance. (“Let the two groups continue to define and govern themselves,” advises Jeb Bush. Gene Wilhoit concurs.) States using the tests pay for them, and the “overhead” on that payment covers the ongoing costs of the assessment consortia. Individual states (or voluntary/regional clusters of states) and the private market continue to do everything else: rate schools, develop curricula and textbooks, train teachers, etc.

Pros include: This is the least disruptive of current arrangements. It is inexpensive. It requires no complex start-up of new entities. It is the most politically palatable in a “tea party” era. And it invites what Bush terms “markets and other nationally interested

groups” to step forward and fill whatever void is left by individual states. “States may decide to work on implementation together,” observes Gene Wilhoit, “but the Common Core must continue to be about expectations—the what, not the how.” “In the short term,” writes Paul Manna, “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...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.”

— *“The major foundations are so large and so powerful in using grants to pursue their strong policy agendas that independence, as a practical matter, may not be complete, even without government funding.”*

— Paul Barton

Cons include: By entrusting so much to states, districts and markets, the effective implementation of the Common Core standards in real classrooms may become less likely. Though students may be somewhat better off due to stronger academic standards, and policymakers, educators, and analysts may be somewhat better off because multi-state tests yield comparable results, nothing profound happens to American education. Any gains in achievement, completion, or college and career readiness may turn out to be marginal. The assessments could become untethered to the standards. Moreover, this approach places long-term trust in potentially unstable organizations. Michael Usdan notes that the coming year will bring enormous turnover in governors’ offices and those of state education chiefs. Neal McCluskey warns that having “groups like CCSSO or NGA” in control would mean that “the political positions of

their members could incentivize dumbing the standards down, especially if performance as measured by the standards is low.”

— *“States may decide to work on implementation together, but the Common Core must continue to be about expectations—the what, not the how.”*

– Gene Wilhoit

Model #3:

One Foot before the Other

This approach features creation of an interim “coordinating council” that might evolve into something more permanent (and ambitious) over time. Such a council might resemble the former National Education Goals Panel (in its early years), though we think it should be funded from private grants and modest participating-state payments. (The federally-financed Goals Panel operated from 1990 to 2002. Its members were governors, members of Congress, state legislators, and representatives of the federal executive branch.)

Participating states might designate its membership, though not every member needs to be a “state representative.” It would require a small but competent staff, an active website, other information-exchange and clearinghouse functions, and it should probably host an annual “compare notes” session akin to the yearly summits convened by the NewSchools Venture Fund. Such a coordinating council might also be responsible for developing concrete plans for longer-term governance. Or, in the words of Eric Smith, a “review of status and future timelines.”

Its initial function would be to encourage states to share ideas and information, especially around the

challenges of implementation and transition, and to keep states and the broader public apprised of exactly what is (and isn’t) happening on the implementation front. Most of the heavy lifting must be done by individual states (and districts, schools, etc.), by the marketplace (both for- and non-profit), and by foundations and other private funding sources. Yet there is obvious merit in tracking who is doing what, in comparing and explaining diverse approaches to Common Core implementation, and in pooling certain activities and arranging shared sources of technical assistance. The coordinating council could usefully facilitate such cooperative work on issues such as curriculum and teacher licensure. According to Eric Smith, “member states [might] purchase products/services directly from consortia-negotiated contracts” and reap some economies from this approach. But all of this is more by way of “making information and help available” and “keeping track of things” than governance per se.

The coordinating council would also be responsible—with suitable expert help—for launching an ambitious validation/evaluation/research program. But it wouldn’t be responsible for updating the standards themselves, at least not for a long time. After all, the new standards shouldn’t need revision for at least several years and the new assessments won’t even be operational for four to five years. Save for correcting actual errors, it doesn’t make sense to revise the standards before the tests aligned with them are in place and are yielding results. Indeed, the revision process should wait—five years, maybe ten, says Pat DeVito. “It will take some time for educators to understand and embrace the standards... and to revise them prematurely will add confusion.” Keeping the standards and assessments separate is also important, notes David Conley, to deter “a natural tendency... to try to harmonize changes in ways that result in the least upheaval to the system as a whole...[A]t a time when the knowledge and skill necessary for life

success may continue to evolve rapidly,” this probably won’t result in the best set of either standards or assessments.

Core funding for the coordinating council’s work should come from private grants and/or state membership dues; but additional resources—maybe federal—would likely be needed for the research agenda, and states that participate in technical assistance co-ops should pay additional fees to cover those costs. (Respondents disagreed on the proper balance between federal and state funding. Paul Manna says, for example, that “the best possible scenario would be to have the states themselves fund the effort.” Rod Paige, on the other hand, says “the entire operation should be paid for by federal funding supplemented by a reasonable fee charged to member states.”)

This coordinating council could be its own new non-profit organization. But getting such an operation off the ground might consume too much time and energy and too many resources. One (anonymous) respondent is “leery of starting from scratch. It takes much longer than people expect.” Rod Paige also sees starting a new organization as too complicated, expen-

sive, and time consuming. So a plausible alternative might be to make the new council a “project” of an existing organization, although none that we know is perfectly suited to this unfamiliar role.

Pros include: It’s incremental (and therefore not scary), encourages diversity and pluralism, allows us to learn from experience, doesn’t cost much, and could be kept at arm’s length from the federal government. It gives the states a bit of breathing room to develop their own implementation strategies and partnerships. It allows the “interim” body to take pains in developing governance options and plans for the longer haul.

Cons include: It kicks a lot of cans down the road, leaving the long-term decisions unresolved. It could also veer off track. (The aforementioned Goals Panel eventually lost its way.) Because it’s more a source of information than actual coordination, states are apt to get away with very different kinds of implementation. There could be gaps between standards and assessments. And it’s unclear whether such a setup is competent—and independent—enough to ensure the satisfactory handling of a complex research, validation, and evaluation function.

PART III: our recommendations

In our minds, and with some honest ambivalence, some version of Model #3—an interim monitoring and coordinating council—makes the most sense at this time. Too much remains unknown about how any of this is going to unfold, and there’s no consensus regarding decisive moves on the governance front. Yet while Model #1 is bolder than the country seems ready for, Model #2 is too passive and doesn’t do enough to nudge forward the process of quality implementation and independent monitoring. Model #3 creates a modest, forward-looking, yet impermanent entity that would do useful things during this sensitive period and help shape the longer haul.

For the moment, let’s call it the Common Core Coordinating Council—“CCCC” or “4C,” which could even morph into “Foresee.” Though we note above that its membership might be determined by participating states, here’s an illustration of the kind of membership that might serve it well—and where those individuals might come from. Consider this model for a ten- to twelve-member council:

- NGA designates two, preferably a Republican governor and a Democratic governor;
- CCSSO designates two, preferably a chief and a state testing director;
- Each of the assessment consortia designates one or two;
- National Conference of State Legislators designates two, one from each party;
- Institute of Education Sciences director designates one; and
- U.S. Secretary of Education designates one.

Start-up funding for the council comes from a consortium of private foundations, but early on, the council develops a dues structure for participating states. Federal funds can play a role, too. We see merit in Judith Rizzo’s formulation: “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.”

The 4C’s initial charge would be five-fold:

- 1.** Track and report on state efforts toward the implementation of the standards and assessments and the many other steps needed to give them traction;
- 2.** Foster interstate cooperation and collaboration, especially when it comes to curriculum and other tools, teacher training and licensure issues, online learning opportunities, and accountability systems;
- 3.** Prepare for the eventual update of the standards and possible inclusion of additional subjects, particularly through a robust research and validation program;
- 4.** Work toward greater understanding and buy-in of the standards among the higher education community, employers, and the general public; and
- 5.** Recommend a long-term governance arrangement.

We think a dedicated staff of ten or so could do this work effectively with a core budget that does not exceed \$5 million annually. Some particular projects—like launching a public awareness campaign or commissioning research and validation studies—would cost more.

Creating a new and independent organization has much to be said for it. Judith Rizzo declares: “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’s a fact, however, that 4C could get going faster and with less hassle by being appended to an existing entity, such as the NGA, CCSSO, Achieve, or ECS.

Let it be noted that we’re not satisfied with stopping at a “coordinating council.” Something bolder, more aggressive, and ambitious would be needed to *ensure* the deliberate and high-quality implementation of the Common Core standards—something akin to

the interstate compact envisioned in Model #1. But we don’t think the country is ready for that, especially in the current political environment. It’s too abrupt a change. It could stir passions about a “national school board.” And it could put the common standards at risk.

Nor do we think that the 4C will be the only entity worrying about Common Core implementation. Many trains are already moving down these tracks, with various organizations and coalitions thinking through how to contribute to the effort.

Still, there’s a lot of work to do to spearhead and organize this important endeavor. Shouldn’t we get started?

APPENDIX A:

partial list of questionnaire respondents

Paul E. Barton, Independent Education Writer and Consultant

Jeb Bush, Former Governor of Florida

David T. Conley, Professor, University of Oregon; Director, Center for Educational Policy Research; CEO, Educational Policy Improvement Center

Pasquale J. DeVito, Director, Client Services, Measured Progress

David P. Driscoll, Former Commissioner of Education for the Commonwealth of Massachusetts, Current Chair of the National Assessment Governing Board

Michael W. Kirst, Professor Emeritus, Stanford University

Paul E. Lingenfelter, President, State Higher Education Executive Officers

Paul Manna, Associate Professor, Department of Government and the Thomas Jefferson Program in Public Policy, College of William and Mary

Neal McCluskey, Associate Director, Center for Educational Freedom, Cato Institute

Mark Musick, James H. Quillen Chair of Excellence in Teaching and Learning, Clemmer College of Education, East Tennessee State University

Rod Paige, 7th U.S. Secretary of Education

Judith A. Rizzo, Executive Director and CEO, James B. Hunt Jr. Institute for Educational Leadership and Policy

Andrew J. Rotherham, Co-Founder and Partner, Bellwether Education

Mark Schneider, Vice President, American Institutes for Research

Robert B. Schwartz, Academic Dean and Professor of Practice, Harvard Graduate School of Education

Eric J. Smith, Commissioner, Florida Department of Education

Michael D. Usdan, Senior Fellow, The Institute for Educational Leadership

Gene Wilhoit, Executive Director, Council of Chief State School Officers



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