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Executive Summary

The Obama administration advocates for education standards designed to make all high school graduates “college- and career-ready.” To achieve this end, the administration is exerting pressure on states to adopt content standards, known as the “common core,” being developed by the National Governors’ Association and the Council of Chief State School Officers (NGA/CCSSO). The administration has, for example, called for federal Title I aid to be withheld from states that do not adopt these or comparable standards. To date, 48 states are at least tentatively participating in the standards effort, thus suggesting that the result might become de facto national standards.

Contentions about global competitiveness provide a key rationale given for common standards, along with increasing equity and streamlining the reform process. The analysis presented here suggests that the data do not support these contentions. U.S. states with high academic standards fare no better (or worse) than those identified as having low academic standards. Research support for standards–driven, test-based accountability systems is similarly weak. And nations with centralized standards generally tend to perform no better (or worse) on international tests than those without.

The NGA/CCSSO standards-development process was completed quickly—in approximately one year—by Achieve, Inc., a private contractor. This brief raises several concerns about the development, content, and use of those 500 pages of standards and supporting documents. For instance, the level of input from school-based practitioners appears to be minimal, the standards themselves have not been field tested, and it is unclear whether the tests used to measure the academic outcomes of common standards will have sufficient validity to justify the high-stakes consequences that will likely arise around their use. Accordingly, it seems improbable that the common core standards will have the positive effects on educational quality or equality being sought by proponents, particularly in light of the lack of essential capacity at the local, state and federal levels.

Recommendations:

- The NGA/CCSSO common core standards initiative should be continued, but only as a low-stakes advisory and assistance tool for states and local districts for the purposes of curriculum improvement, articulation and professional development.
• The NGA/CCSSO common core standards should be subjected to extensive validation, trials and subsequent revisions before implementation. During this time, states should be encouraged to carefully examine and experiment with broad-based school-evaluation systems.

• Given the current strengths and weaknesses in testing and measurement, policymakers should not implement high-stakes accountability systems where the assessments are inadequate for such purposes.
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Introduction

Because economic progress and educational achievement go hand in hand, educating every American student to graduate prepared for college and success in a new work force is a national imperative. Meeting this challenge requires that state standards reflect a level of teaching and learning needed for students to graduate ready for success in college and careers.

Barack Obama
White House Statement
February 22, 2010

Continuing along the path set by his three immediate predecessors, President Obama has stated a strong commitment to academic standards as a fundamental element of his educational reform agenda. Accordingly, in the administration’s proposal for the reauthorization of the Elementary and Secondary Education Act, “A Blueprint for Reform” (here referred to as the “Blueprint”), the first section is entitled “Raising standards for all children.” Since the federal government’s legal and political authority to mandate common national standards is contested, the administration has instead applauded and encouraged the work of the National Governors Association (NGA) and the Council of Chief State School Officers (CCSSO) in developing proposed “common core” standards in reading and math (henceforth referred to as the NGA/CCSSO effort). The administration has also announced its intention to “require all states to adopt and certify that they have college- and career-ready standards in reading and mathematics, which may include common standards developed by a state-led consortium, as a condition for qualifying for Title I funding.” Likewise, the federal Race to the Top competition for funds gives an advantage to states that have a clear intention to adopt such standards. As the NGA/CCSSO effort is the only collaborative effort of this type and 48 states and the District of Columbia are listed as cooperating with the initiative, the NGA/CCSSO standards are poised to become the de facto national curriculum standards.

The NGA/CCSSO standards set forth what students are to learn (such as a command of the conventions of standard written English), but avoids using the term “curriculum,” perhaps to avoid perceived overstepping of the federal law. The administration plans to encourage standards-related curriculum development by, among other things, budgeting $2.5 billion to align state curricula with the NGA/CCSSO standards. An additional $400 million is budgeted for developing
related standardized tests and measures (assessments), resulting in an aligned package of standards, curriculum and assessments. Although beyond the scope of the analysis below, it should also be noted that, in applying the standards, the administration would mandate specific “turn-around” strategies for schools that failed to produce what it considers to be adequate standards-based results. These strategies include firing the principal, firing some or most of the staff, and converting the school to a charter school or closing the school(s).

Taken together, the proposed changes would give the federal government unprecedented influence over the curriculum, pedagogy and governance structure of the nation’s schools.

The Rationale for Standards

According to the administration, common standards are necessary for national economic competitiveness in a global economy. The Obama Blueprint document also asserts that common standards are important in achieving the equality goal of having all children, regardless of circumstance, achieve at high levels. As noted above, aligning these standards with curriculum and assessments is also a key part of the federal approach. In the Blueprint, the common standards are specifically required to be “high” (all students must be career- and college-ready), as contrasted with “low” standards such as those of the 1970s, which only required students to achieve minimum basic skills.

President Obama’s letter transmitting the Blueprint to Congress says that “we must raise the expectations for our students, for our schools and for ourselves” to prevent other nations from out-competing us. The National Governors Association and Council of Chief State School Officers also assert that international competitiveness requires common core standards. Think tanks and business organizations routinely link standards to economic competitiveness.

The equity argument is made by, among others, the Education Trust, which asserts that educational equity demands uniform, high-quality, standards-based curricula for all. It points to the clear history in the United States of curricular stratification and disparate opportunities; if there are different paths for different students, poor children will be given the inferior path. This view is supported by Joan Richardson, editor of Phi Delta Kappan: “Standards are an essential step toward ensuring equity and high-quality learning for all children everywhere.”

Others claim that the large variations in state assessments and proficiency levels prevent effective and efficient reform, and they advocate moving away from the “messy thinking, disparate standards, and misguided direction” associated with current state standards. In this view, “common core” standards will allow broad-based sharing of what works within and across schools, districts and states. Thus, efficiency will be increased. Further, with a common curriculum, children will be able to move from school to school across the nation and basically not have the continuity of their studies interrupted.

Critics of common standards tend to focus on two types of objections. The most common objections are to top-down, high-stakes standards in general,
whether they originate at the state level or the national ("common") level. They worry that standardization diminishes schooling at its best—the rich variety of experiences and higher-order thinking still found in many classrooms. They caution against locking children into a one-size-fits-all model of education. Society’s needs, they say, are far more diverse than are accounted for by specified standards.\textsuperscript{16} Mostly, they worry that common standards would reduce teaching to only a narrow range of testable information and would not produce the knowledge, flexibility and creativity needed for a new and uncertain age.\textsuperscript{17} Buttressing this concern, the Center on Education Policy found that the emphasis on test-based accountability has indeed already narrowed the curriculum.\textsuperscript{18}

The second type of concern, directed specifically at the new common core standards initiative, focuses on the likelihood of intensification of the most damaging aspects of the existing standards-based accountability policies. When not accompanied by a substantial influx of capacity-building and resources that reach teachers and students, the punitive elements of these policies overwhelm the elements that have the potential to enrich learning. Looking at the common core standards initiative as part of the larger set of education proposals in the Obama administration’s Blueprint and its Race to the Top initiative, the standards appear as a key element of an intensification of these punitive policies, now focused on teachers working in vulnerable communities.

**Analyzing the Case for Common Standards**

There exists no research on the actual impact of common national standards in the United States. The reason is simple: there have never been such standards. There is, however, research evidence that bears on the likely impact of such a system. Other nations have national standards, and over the past two decades all states have adopted standards-based education policies. These efforts can illuminate the likely results of the common core standards policy.

In addition to research evidence, policymakers and others may consider policy and political concerns. As noted, for instance, the federal government’s role in k-12 education has historically been limited, with states charged in their individual constitutions with those responsibilities. Whether framed as a legal, political or policy matter, many Americans question whether the federal government should make such a strong demand on states to adopt common standards. There are also a variety of implementation issues and obstacles that may undermine the success of a common standards effort. Whether such a system can be implemented with valid assessments is fundamental, as is the adequate funding of the programs needed for children to reach these standards.

**Common Standards in Context**

Standards-based reform is not new. Indeed, efforts to create academic standards for public schools are almost as old as the republic.\textsuperscript{19} As one example,
consider a policy that Education Secretary Arne Duncan had implemented in his previous job as CEO of the Chicago school system. He required that explicit lesson plans (including the page numbers to be covered) be posted on the Web. Although he may not have realized it, Duncan was following in the footsteps of a previous Chicago school superintendent. In 1862, Superintendent William Harvey Wells prescribed the lessons for each day and how they should be taught. There was a uniform course of study, and grading and promotion hinged on test scores. As described below, recent efforts of this sort have set the stage for current policy and provide a glimpse into possible outcomes.

Goals 2000

The current push for standards might best be understood as an extension of the education proposals of President George H.W. Bush. The first President Bush met with National Business Roundtable leaders in 1989, and together they set forth what they considered to be the nine essential components of a high-quality education system, including standards, assessments and accountability. Furthermore, all students were to be taught to the same levels of performance.

Also in 1989, President Bush called the first “education summit,” at which governors agreed to set national goals and pledged support for state-based reform initiatives. Educators were for the most part not represented in these two efforts. As a result, standards-making shifted from the professional sphere to a business-influenced political domain.

In 1994, President Clinton, who as governor of Arkansas had been a prime mover at the first education summit, signed Goals 2000 into law. This legislation, which arose out of that 1989 summit, provided states with grants to adopt content standards and established a national goals panel. Goals 2000 generated a conservative-led backlash against the growing federal role in education as well as the specific content of some goals and standards. The tenor of the reaction can be seen in a 1995 Senate resolution, passed on a 99-1 vote, protesting the adoption of history standards, in large part because of a controversy about multiculturalism. Congress eliminated the national goals panel in 1996.

State Standards and No Child Left Behind

Meanwhile, Texas was among the first states to adopt new curriculum and performance standards, aligned to high-stakes standardized assessments. The second President Bush trumpeted these policies during his campaign and incorporated them into his 2001 reauthorization of the Elementary and Secondary Education Act (“No Child Left Behind”), which essentially required states to create and adopt such standards and assessments. State-level National Assessment of Educational Progress (NAEP) scores would serve as a common measure across states. Initially, the wide diversity of state standards under NCLB was viewed as a virtue. After almost a decade, however, the political winds shifted—in large part be-
cause of studies showing that state determinations of “proficient” had little correlation to relative NAEP performance. The Obama administration now uses the heterogeneity of state standards as a justification for common “college- and career-ready” standards. The administration also quoted, as justification for high, common standards, this same National Center for Education Statistics (NCES) study reporting that a number of states had lowered their standards under NCLB in order to avoid the law’s escalating punitive elements.

The NGA/CCSSO Standards Initiative

In April 2009, representatives from 41 states met with CCSSO and NGA representatives in Chicago and agreed to draft a set of common standards for education. Achieve, a corporation founded by the NGA following the 1996 demise of the national standards effort, was commissioned by NGA/CCSSO after the Chicago meeting to draft the new “common core” standards in reading and mathematics. The project was fast-tracked: Achieve was to have a draft by summer 2009 and grade-by-grade standards by the end of the year. Historically, the development of subject-matter standards had been the province of specialists in those subjects working in universities and in schools. By contrast, Achieve workgroups met in private and the development work was conducted by persons who were not, with apparently only a single exception, K-12 educators. The work groups were staffed almost exclusively by employees of Achieve, testing companies (ACT and the College Board), and pro-accountability groups (e.g., America’s Choice, Student Achievement Partners, the Hoover Institute). Practitioners and subject matter experts complained that they were excluded from the development process. Project Director Dane Linn said this was because they were (as paraphrased by Education Week) “determined to draft standards based on the best available research about effective math and reading curricula, rather than the opinions of any single organization.” The internal review boards consisted predominately of college professors. Of the more than 65 people involved in the common core design and review, only one was a classroom teacher and no school administrator is listed as being a member of the groups. In addition to the financial support from the federal government, the Gates Foundation is a significant contributor to the common core standards effort. A number of confidential iterations of the standards took place between the developers and state departments of education. The first public release of a draft was on March 10, 2010.

The Achieve standards are content standards, specifying what is to be learned by students at the various levels. Rather than promoting rote knowledge, the goal is to elevate higher-order skills as “American competitiveness relies on an education system that can adequately prepare our youth for college and the workforce.” In addition, “the standards created will not lower the bar but raise it for all students.” The “final recommendations” for the common core standards were released on June 2, 2010, and may be found at http://www.corestandards.org/the-standards. The evidence supporting the standards can be found at...
The stated aim of the project is to have “fewer, clearer, higher standards.” The recently released final standards and supporting materials are approximately 500 pages long, which some may find less simplified than promised. Pursuant to the push from the Obama administration, a state hoping to be eligible for the second round of Race to the Top grants must adopt these standards by August 2, 2010. The NGA/CCSSO guidelines envision statewide adoption of the standards and require states to adopt at least 85% of the common core standards if they wish to be part of the effort. While the request for proposals and contractor selection phase is now underway, no assessments have yet been constructed nor minimal levels of achievement defined.

The Assessment Development Initiative

Proposals have been submitted in response to a federal RFP for multi-state assessment consortia to design tests based on the common core. Three groups have been formed, with the largest including 31 states and the second largest encompassing 26 states. (Some states belong to both groups; the third group addresses graduation examinations.) The two major proposals reportedly have a number of similarities, and the two groups anticipate having “common benchmarks” or cut-off scores. These would effectively become national proficiency level expectations. The participants, however, acknowledge psychometric obstacles and doubt they can implement a valid system by the 2014-15 deadline.

Policy Issues

Are Common Standards the Key to International Competitiveness?

Those advocating common standards often lead with some variation on their important role in helping the U.S. to compete effectively in an international 21st century society. The assumptions on which this rationale is based are examined below.

High quality state standards result in high test scores

Grover Whitehurst, former director of the federal Institute of Education Sciences and now Director of the Brown Center on Education Policy at the Brookings Institute, recently classified states as having “high” or “low” standards. He compared state proficiency scores in mathematics using the state’s NAEP scores as well as the gains in these scores over time. In this case, high and low standards were defined by the Fordham Foundation’s ratings of state standards and by the American Federation of Teachers’ ratings of state elementary mathematics standards. He found no relationship between the rigor of a state’s standards and its NAEP scores. Whether changes were measured over time, or at

http://epicpolicy.org/publication/common-core-standards
a fixed time, or disaggregated by race, the results showed very small or no relationships. Some high-scoring states had poor or low standards while some low-scoring states had high standards.\textsuperscript{42} Whitehurst concludes:

The lack of evidence that better content standards enhance student achievement is remarkable given the level of investment in this policy and the high hopes attached to it. There is a rational argument to be made for good content standards being a precondition for other desirable reforms, but it is currently just that—an argument.\textsuperscript{43}

Similarly, in 2008, NCES indexed each state’s NAEP scores against that state’s standards thereby providing a relative measure of the difficulty of each state’s standards. It found that the rigor of the state standards has no relation with higher performance on NAEP. The NCES study found inconsistent and small effect sizes of between 7\% and 10\% of the variance. These results were statistically significant for the fourth grade but not for the eighth.\textsuperscript{44} While standards may have a positive effect on the provision of education, meaningful reform will require much more than the simple act of increasing or having common standards.

\textit{The presence of national standards results in higher scores on international comparison tests}

For a simple, albeit superficial, test of the claim that national standards generate higher test scores, some have looked at whether high- or low-scoring nations have national educational standards. For eighth-grade math and science scores on the Trends in International Mathematics and Science Study tests (TIMSS), one observer noted that 8 of the 10 top-scoring countries had centralized education curricula—and 9 of the 10 lowest-scoring countries did as well.\textsuperscript{45} A second reviewer of the same data sliced them a different way. He found 33 of the 39 nations that scored below the United States had national standards.\textsuperscript{46} All of the 9 lowest performers had national standards. Among the 5 top-scoring nations, 3 did not have national standards.\textsuperscript{47}

These simple comparisons are methodologically weak and they do not allow for any causal inferences. What is clear, however, is that standards neither make nor break a national education system. Logically, there would be no reason to expect any different results, since the presence or absence of national standards says nothing about equity, quality or the provision of necessary educational resources.

\textit{The United States is in danger of not being competitive in the global economy because of the failings of the educational system}

Advocates of common core standards present education as the key to global economic competitiveness.\textsuperscript{48} The most abundant support for the link between education and economic competitiveness is associational (note the wording
of President Obama’s statement at the beginning of this paper). That is, countries whose populations have higher levels of education have more robust economies. What is not sorted out is cause and effect in this highly interactive and multifaceted relationship, since robust economies can support greater schooling. The complexity is illustrated by the United States’ current under-employment and unemployment among the college-educated while the nation remains internationally competitive. Moreover, comparisons can be misleading, since the significant investments in technology, engineering, vocational education and skills-development necessary for a developing country’s economy are different in kind and degree from those needed in the United States.

Looking longitudinally at the U.S. itself, one finds a history of warnings, exemplified by the 1983 prediction in the “Nation at Risk” report, that the United States would suffer an economic decline due to educational shortcomings. Clearly the U.S. educational system suffers from inequities and limited resources as well as inefficiencies. But if there were a strong linkage between those shortcomings and the economy, the nation’s competitiveness ranking would have been expected to slip considerably in the last 27 years. Such has not been the case. In the nine years the World Economic Forum (WEF) has ranked nations on global competitiveness, the United States has typically been ranked first. (For 2009-10, the United States fell to second with the banking and economic collapse.)

In examining the WEF’s “Twelve Pillars of Competitiveness,” two relate to education. One is “health and primary education” and the other is “higher education and training.” On primary education, the report warns against cutting expenditures in “basic education.” In higher education, adaptability is the key criterion, rather than specific knowledge such as that found on most standards lists. Of the WEF criteria, education falls well below other competitiveness factors such as strong financial markets and macroeconomic stability.

**Common standards help meet the workforce needs of the 21st century economy**

In calling for all students to meet higher standards and be “college- and career-ready,” the Obama administration’s supporting research document includes only limited research citations. For instance, it cites only one independent NCES report on the proportion of college students taking remediation courses along with a vested interest group estimate of costs to society. Regarding workforce readiness, one independent report, published by the Brookings Institution, is cited along with documents by common core contractors. Surprisingly, the Brookings report, “The Future of Middle Skills Jobs,” actually contradicts the Obama administration’s claim. It argues that the need for middle-skill jobs (such as plumbers, electricians, health care workers, and police officers) will continue. According to this Brookings report, claims concerning the loss of these types of jobs have been exaggerated. Belying the call for greater skill levels, the report states, “Using education as a proxy for skills, the projections indicate a dramatic slowdown in the growth of skills over the next two decades, at both the top and the middle of the labor market.”

Coming to the same conclusion, the Economic Policy Institute’s Richard Rothstein highlights a paradox in the administration’s proposed policy: an increa-
singly technology-dependent world actually requires fewer skills for almost all people. Passing items by a check-out lane scanner is, for example, much easier than manually keying in prices. Beyond entry-level training and on-the-job training, 70% of United States jobs do not require more than a high school education, 20% require a college education, and only 10% require technical training.55

Paul Barton of the Educational Testing Service notes that the actual knowledge levels needed in different jobs and professions have immense variation. As regards “college-ready,” the types of skills needed to succeed in astrophysics at MIT are not the same as those of a successful welder trained at a community college. For “career-ready,” the requirements for a pipe-fitter are not the same as for a salesperson or an accountant. Thus, while “college- or career-ready” standards are touted as high standards, in reality, the skill levels within this open-ended phrase are very diverse. Barton cautions that these common standards represent a huge over-simplification of educational needs that would result in a one-size-fits-all high school curriculum that fails to account for the individual differences in children.56

Thus, the call for college- and career-ready standards as necessary for the 21st century global economy does not meet two somewhat different criteria. First, it does not reflect the actual workforce needs of the nation and, second, it is a vague and all-encompassing term that while appearing to be definitive, is anything but that.

The Effects of Standards in the Context of Test-Based Accountability Systems

As noted, there is only limited research suggesting that implementing common standards will, by itself, be an effective reform mechanism. To be sure, there are abundant and uncontested illustrations of the differences between state standards and great variation among state proficiency levels.57 There are also numerous advocacy pieces and guides on how to construct state standards. Passionate appeals on the need for uniform standards for educational improvement are also common.58

Among these documents, the question rarely if ever addressed is whether there is any evidence suggesting that the current diverse collection of standards or their merger into a single set helps, harms, or has zero effect on learning.

To be sure, this is not an easy question to answer, but it seems to be the most important. The NCLB legislation required state standards, but this reform was accompanied by new mandates for testing, sanctions and interventions—making it very difficult to tease out the effects of only one of these elements. The Blueprint also proposes a host of new reforms to be implemented simultaneously. Further, economic and social changes, such as the recession and funding rescissions, roil through the nation and through states at the same time, and it becomes even more difficult to isolate the effects of changing standards.

A number of researchers used the phase-in of state accountability systems in the 1990s (before NCLB) to examine the effects of those comprehensive standards-based reforms. In looking at this work, the reader should bear in mind that there is a big difference between standards alone and state standards-based accountability systems grounded in high-stakes state exams. The effects of these reforms—good or bad—could be due at least as much to the accountability provi-
sions as to the standards themselves. Moreover, aggregated state results are complicated by the reality that state systems were, and are, quite diverse.

A frequently cited 2002 study found that states that had implemented stronger accountability systems (i.e., with stronger consequences) had higher fourth- and eighth-grade NAEP test-score gains. The eighth-grade effects were large and significant, while fourth-grade effects were smaller. High school drop-out rates and progression through the grades showed no relationship with the presence of an accountability system. However, there was large variation and volatility in effects for White, Black and Hispanic students among the states. Some of the gains in low-stakes states were greater than the gains in high-stakes states.

Another prominent study concluded that high-stakes accountability had no effect on test scores. Because state tests are subject to narrowed curriculum, teaching to the test, and other validity problems, the authors instead used college entrance examinations, advanced placement tests and NAEP scores between 1990 and 2000 as their indicators of achievement. In all but one of the 18 comparisons in the study, student learning was either indeterminate, remained the same or went down. Thus, the study offered no support for the efficacy of accountability systems. A later study investigated these findings using cross-sectional and cohort-based analyses, so that the reform states would have a comparison group. When the scores of the remaining “low-stakes” states (where available) were used as the control, the study found stronger gains between 1992 and 2000 for the high-stakes states. Yet when the study followed a particular cohort across the years, the comparisons favored the low-stakes states.

Two final studies are worth noting. In one, the researchers examined the rolling implementation of standards-based reforms during the 1990s and concluded that accountability systems improve test scores. States that implemented accountability systems early in the decade had higher NAEP score gains than those that started high-stakes systems later. But they also found that drop-out rates as well as the Black-White achievement gap were negatively affected. Using the national census and education’s Common Core of Data, later researchers found similar results and also found that exit exams linked to the standards may improve scores in some cases but lead to increased drop-outs and greater inequality.

With almost two decades of experience with standards-based accountability systems, we have no clear evidence that they are particularly effective. Beneficial effects on average test scores are minimal, and some troubling evidence suggests negative effects on the achievement gap and the drop-out rate.

**Questioning the Federal Role**

There has been considerable pushback against the common core standards initiative by those who oppose the expanded federal role in education. The potential of federally supported common standards with two or three common tests using common cut-off scores is seen as a massive and unwarranted intrusion into the business of states and local districts. As noted, the No Child Left Behind Law is read by some as prohibiting the federal government from defining curriculum and instruction.
In addition, the legislation creating the Department of Education prohibits federal involvement in a national test. As education is not mentioned in the Constitution, some contend that such prescriptions must remain a state responsibility.

The National Conference of State Legislatures (NCSL) claims that setting curriculum and providing support for assessment of national standards, even through non-governmental agencies such as the NGA and CCSSO, violates statutory prohibitions. Even if the common core standards are promoted through funding threats and incentives, as opposed to direct mandates, the line is arguably crossed. The NCSL argues that the federal government is most effective in its original role of helping, supporting and encouraging states. Implementing a coercive federal compliance model is not where the government’s strength lies. Rather, a multitude of diverse state and local efforts should be implemented and studied before—if found effective—being scaled up nationally.

**Implementation Issues**

Implementation creates practical problems that must be resolved if the NGA/CCSSO effort is to be successful. To be sure, there is substantial overlap between policy issues and implementation obstacles, but the discussion below attempts to flesh out the latter by pointing to four areas: (a) the content of standards and the formal comments from professional organizations, (b) cut-score issues, (c) issues of validity and reliability, and (d) resource issues.

**Content and the Reaction from Professional Organizations**

On the surface, English and mathematics seem like straightforward, basic skills on which agreement is easy. But this has not proven to be the case. During the 1990s, efforts at developing standards for mathematics, reading and history fell victim to deep divisions over content and classroom implications. While standards advocates argued that the needs of the economy and international competitiveness demanded specified content, many educators said that the reform both narrowed and lowered the level of the curriculum. The 1995 Senate vote to cut funding for the history standards, a decision rooted in conflicts over cultural and diversity issues, also demonstrates the political divisions that can arise over curriculum content.

The major educational professional associations such as the American Association of School Administrators, National Association of State Boards of Education, National Education Association, American Federation of Teachers, and National School Boards Association have been supportive of the NGA/CCSSO initiative, though conditioning their support on the provision of adequate resources and professional development, as well as on active involvement by practitioners. The statements from teacher organizations in particular included strong calls for more time to be taken for careful development, for standards being broader than just reading and mathematics, for avoiding a lock-step curriculum and for maintaining the role of local educators. However, it is the math and Eng-
lish teachers associations that have focused most on the content of the draft standards, and they have voiced serious concerns.

The National Council of Teachers of Mathematics (NCTM) has been heavily involved in writing standards since 1989. Not surprisingly, the NCTM spokespeople indicate a preference for their own work. They compliment the NGA/CCSSO effort, but report that the curriculum is not properly articulated from one grade to the next. They also object to the lack of focus on mathematical understanding and to the short-changing of technology, statistics and data analysis. Fractions, according to NCTM, get too much attention, and the organization worries overall that the standards are inadequate and fall short of the mark.75

The National Council of Teachers of English (NCTE) was cautious about taking a general stand on the standards. Yet, in its committee review, the group felt that the NGA/CCSSO effort was too narrow and inappropriately prescriptive, and that grade-to-grade articulation was deficient. Members especially criticized what they felt was the standards’ concentration on lower-order rote learning at the expense of higher-order thinking and applications—despite claims to the contrary by the NGA/CCSSO. They expressed worry that the standards would reduce the curriculum to what can be measured on a standardized test.76

In the revisions to the standards following the spring 2010 review period, Education Week reports that math standards were made “easier to test” and grade-to-grade articulation was smoothed. English standards placed a stronger emphasis on technical reading such as comprehending government documents.77 Notwithstanding their earlier concerns, the NCTM and three other groups of mathematics professionals did endorse these NGA/CCSSO “final recommendations.”78 The NCTE stayed with its earlier generalized statement.79

The complete NGA/CCSSO development and review process has been conducted in one year (June 2009-June 2010). In most standards efforts, there is extensive practitioner involvement, accompanied by public hearings, which have typically been conducted over years. The draft recommendations were made publicly available on March 10, 2010, and the final recommendations were released on June 2, 2010. Most of the review process was conducted confidentially, although state agencies were given restricted drafts along the way. In the end, states were left with two months (until August 2, 2010) to review and adopt the standards or formally declare their intent prior to the Race to the Top application deadline. In the administration’s plan, such standards are necessary to be eligible for Race to the Top funding.80 Yet conducting a thorough review and state board adoption during the summer months substantially limits the likelihood of wide, thoughtful and comprehensive review by qualified practitioners.

**Cut Scores on Assessments Attached to the Standards**

Beyond the difficulty level implied by the requirement that every American high school graduate be “college- and career-ready,” there is a less visible but critically important set of decisions that must be made: the difficulty of the necessary tests and where the passing scores (or cut scores) are set. These decisions di-
rectly affect the percentage of students, teachers and schools labeled proficient—as “passing” or “failing.” Excessive or unrealistically high standards lead to the counseling away of potentially low-scoring students and tend to be harmful to individuals, the economy and society.\textsuperscript{81}

Rather than being scientifically determined or validated by some real-life criteria, cut-off points have no such foundation. The Educational Testing Service’s Randy Bennett says, “It’s a political question about how much you need to know and be able to do to be proficient.”\textsuperscript{82} The problem is illustrated in the controversy that erupted when proficiency levels were attached to the NAEP test.\textsuperscript{83} To demonstrate the arbitrary and unrealistically high level of the new national assessment standards, Gerald Bracey documented that no nation has ever achieved so high a level of test score performances.\textsuperscript{84}

The NGA/CCSSO cut-score criterion is that “every high school student must be college-ready.”\textsuperscript{85} Yet, the Pioneer Institute argued the standards were too low, while the Economic Policy Institute said they were too high.\textsuperscript{86} Psychometrists approach the cut-off score in a different way. They recommend the point on the scale where the least measurement error is found and design the tests to have the greatest discriminatory power at that point on the test’s scale. However, this statistical exercise may or may not bear any relation to the knowledge a student needs to prosper in society—which in the end is a political exercise, informed, it is hoped, by practitioner knowledge.\textsuperscript{87}

### Validity and Reliability of Assessments

When test scores are used for “high-stakes” assessment—to determine student promotion or graduation, to sanction a school or to make compensation or employment decisions—they must meet the highest standards for validity and reliability. The technical criteria are most easily satisfied by multiple-choice tests, which can be scored inexpensively and quickly. But properly measuring the higher-order skills to which the administration and the NGA/CCSSO aspire is considerably more problematic for state-wide testing programs. Scoring open-ended or constructed responses on tests measuring “problem solving” represents a far more demanding set of challenges.

Unfortunately, fundamental measurement issues continue to undermine state assessments: tests are incomplete measures of achievement, learning targets are not always coherent or clearly expressed, vertical scaling—necessary for growth models—remains problematic, tests are often not on equal interval scales (essential for measuring progress), and measurement error is too large for high-stakes applications.\textsuperscript{88}

To meet growth-score requirements, the tested knowledge must be linear, sequential and hierarchal. However, once beyond elementary-school reading and math, this requirement is not easily met. Reading and understanding directions is, for instance, very different from writing poetry. In the current state of psychometrics, measuring the growth of higher-order skills with a series of standardized tests poses significant measurement and cost problems.\textsuperscript{89}
While “growth scores” (and particularly value-added models) are touted by some as an answer to NCLB’s problem of comparing very different groups of students, many key measurement and policy issues remain unresolved. Both the subject matter content and the tests must be *vertically equated*. That is, a scale score must run up through the grades and be comparable from one grade to the next. Unfortunately, none of the methods to build this essential equal-interval vertical scale is free of fundamental flaws.

Robert Linn summed it up a decade ago, and his cautions still hold true:

I am led to conclude that in most cases the instruments and technology have not been up to the demands that have been placed on them by high-stakes accountability. Assessment systems that are useful monitors lose much of their dependability and credibility for that purpose when high-stakes are attached to them. The unintended negative effects of the high-stakes accountability uses often outweigh the intended positive effects.

While the NGA/CCSSO leaders are aware of the need to “develop new ways of thinking about psychometric rules,” it does not appear that solutions have been found.

**Equality and the Lack of Adequate Funding**

Proponents of the standards effort assert that it will create opportunities for all children to have high and equal educational opportunities, avoiding or limiting destructive practices that marginalize children by shunting them off to weaker classes and schools. Yet these promises must be considered in light of the recent experiences with the No Child Left Behind law. The underfunding of NCLB and of financially challenged schools has been the subject of considerable and still unresolved controversy. Specifically, the level of funding needed to provide a legally adequate education has been litigated and studied extensively, resulting in the completion of more than 70 statewide adequacy studies. These studies tend to show that economically deprived children require 20% to 40% more funds per pupil than more advantaged students. If we supplied the resources necessary for all children to reach standards, the total increased costs are estimated at about 32% more than current total federal, state and local education spending, or $158.5 billion in FY05 monies. Unfortunately, the most vulnerable students continue to receive fewer resources than their more advantaged counterparts, even after taking into account dedicated funds (such as Title I) from both federal and state governments. High-minority districts received 17% less money per child, while poor districts received 20% less than their more affluent neighbors.

In the midst of the current recession, state school funding has been squeezed, and the administration’s FY2011 budget proposal calls for flat-funding economically deprived children (Title I) and shifting new and old funds from need-based allocation to competitive grants. Even if competitive funds are suc-
cessful in improving achievement for the fund winners, the needs of the funding losers remain unaddressed. Yet, the common core standards initiative could easily result in new unfunded obligations at all governmental levels. And if the initiative is genuinely successful in making schooling more demanding and challenging, even more resources will be needed to accomplish those goals. The president has critically noted that No Child Left Behind has been underfunded, but the administration has not explained how these essential resource needs will be met. Nor are these resources provided in the administration’s budget proposals. Most importantly, the administration has not addressed how the increase in standards and accountability consequences, when combined with dramatic funding shortfalls, will improve schools.

Conclusions, Discussion and Recommendations

The Obama administration has stated its commitment to research-based and evidence-based (“what works”) policy making. Thus, it is troubling that the common core standards initiative lacks a convincing research base. In May 2010, the administration did publish a “research summary” concerning its proposals to achieve “college- and career-ready students,” and a few pages were devoted to common core standards (the remainder of the research summary focuses on accountability and capacity). The summary presents standards as a valid and meaningful reform tool, but the support for this statement is primarily in the form of a critique of the existing system. As Gerald Bracey noted, there is no evidence that the simple act of raising standards or making them uniform across states will, in fact, cause increased student learning. Similarly, Grover Whitehurst did not find, following his 50-state analysis, a relationship between standards and performance. At the very least, there appears to be faint evidence or promise for this reform in proportion to the massive, national undertaking it has become.

In fact, setting high uniform national standards could be harmful to effective government and reform. Richard Rothstein contends that “the most widely ridiculed of NCLB’s pretensions was that all children would be ‘proficient’ at a challenging level by 2014.” This foundational element bred cynicism, undermined the legitimacy of other aspects of the law, and even corrupted classroom learning.

While many education-practitioner organizations have endorsed the new common core standards initiative, they have simultaneously said that proper economic, programmatic and social support for our neediest children as well as for adequate professional development and organizational support is required if the effort is to be meaningful. States and local districts do not currently have the capacity. With the president’s proposal to flat-fund the Title I allocations in FY2011, corresponding with the end of ARRA stimulus funds and the weak fiscal condition of the states, the provision of adequate and necessary resources seems particularly important yet increasingly unlikely.

To be sure, common standards could bring a much-needed focus and common agenda to educational conversations and professional development. A coherent and articulated curriculum, clearly expressed, is logically fundamental to
any across-the-board reform initiative. However, the swift production of 500 pages of learning standards, with federal pressure on states to adopt them within two months, begs for a more thoughtful and considered review. Standards of this scale, complexity and importance should be field-tested and revised for validity, focus and effects as implemented. Objective review is particularly necessary for an effort undertaken with deep involvement by groups with a financial interest in the outcome, a process with a very limited review window, no trial implementation, and development that largely failed to include practitioners.

Several other elements are also troubling. The major rationale offered for common standards—international economic competitiveness—is poorly grounded. There is only a weak or nonexistent relationship between common standards and high scores on international achievement measures. Within the United States, there is no relationship between high state standards and NAEP scores. The research on the efficacy of standards-based accountability systems is mixed. The level of test cut-off scores is determined politically rather than empirically. Major psychometric problems, particularly for measuring growth or value added, remain unresolved. And the Obama administration argues for strong “turnaround” or school takeover provisions being associated with standards and their associated tests, yet such systems lack a convincing research base and appear psychometrically inadequate for such high-stakes applications.

Finally, any meaningful, successful reform tied to these common core standards would have to include a major new investment of resources, to help teachers and students meet the more ambitious goals. To date, such resource discussions have been minimal. It does not appear that the types of program investments necessary for our lowest-achieving students will be made. Without this support, the effectiveness of any standards-based accountability system is foreclosed. The common core initiative faces the real danger of focusing American policy on ineffective and false panaceas while ignoring the fundamental inequities in educational opportunities that lie at the root of the nation’s greatest educational problems.

Recommendations

- The NGA/CCSSO common core standards initiative should be continued, but only as a low-stakes advisory and assistance tool for states and local districts for the purposes of curriculum improvement, articulation and professional development.
- The NGA/CCSSO common core standards should be subjected to extensive validation, trials and subsequent revisions before implementation. During this time, states should be encouraged to carefully examine and experiment with broad-based school-evaluation systems.
- Given the current strengths and weaknesses in testing and measurement, policymakers should not implement high-stakes accountability systems where the assessments are inadequate for such purposes.
Notes and References


11 See for example,


http://epicpolicy.org/publication/common-core-standards

Publishers and testing companies, many of whom are sponsors of the NGA/CCSSO standards project, also tend to favor common standards. Their arguments range from policy (reform efficiency and focus will be improved as a result) to business considerations (Publisher Houghton-Mifflin, for example, points out that national standards would mitigate the need to publish a large number of different texts, while Scholastic Inc. sees standards as providing a better focus for their business opportunities). Aarons, D. I. (2010, January 14). Marketing scramble ahead amid a shifting landscape; Quality Counts 2010. *Education Week, 29*(17), 17.


Also see, Broader, Bolder approach to education at [http://www.boldapproach.org/statement.html](http://www.boldapproach.org/statement.html)


This elementary grades prescription has since been restricted to a password-protected site. [http://intranet.cps.k12.il.us/Lessons/StructuredCurriculumTOC/structuredcurriculumtoc.html](http://intranet.cps.k12.il.us/Lessons/StructuredCurriculumTOC/structuredcurriculumtoc.html)


This report can be found at http://www2.ed.gov/pubs/NatAtRisk/index.html.


See for example,


http://epicpolicy.org/publication/common-core-standards


See also the formal statement of the National School Boards Association, found at http://onlinepressroom.net/nsba/new/.


The formal statements or endorsements of the organizations can be found at www.corestandards.org


Also see the formal statement of NCTM at http://www.corestandards.org/the-standards.


Davis, M. (2010, June 9). Personal email from NCTE re: Public Information: NGA/CCSSO common core standards


Marion, S. (2010, May 3). Getting value from value-added. Presentation at the American Educational Research Association annual meeting in Denver, CO.


http://epicpolicy.org/publication/common-core-standards


87 For a more technical discussion of these issues, see the National Research Council and National Academy of Education working group papers at [http://www7.nationalacademies.org/bota/VAM_Workshop_Agenda.html](http://www7.nationalacademies.org/bota/VAM_Workshop_Agenda.html). In particular, see the papers by Robert Linn and Mark Reckase.


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Also see,


107 See organizational statements at the commoncore.org web site.


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