

What Can the Common Core State Standards Initiative Learn from the National Assessment Governing Board?

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Common Education Standards: Tackling the Long-Term Questions

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Introduction

The Common Core State Standards Initiative (CCSSI) is a bit like the underdog candidate who wins the election when few think it possible. “Now what?” is the question facing the surprised victor. With an initial agreement for the Common Core State Standards to be developed, and visible progress toward their development and promulgation, what will happen to those standards and the new assessments meant to be aligned with them?

There are many ways to think about “now what” or “what next.” One way is to seek lessons from a previous effort that has some similarities to CCSSI.

The National Assessment of Educational Progress (NAEP) and its National Assessment Governing Board (NAGB) are an obvious place to look. The fact that some are suggesting that the CCSSI and associated assessments might be assigned, long term, to NAGB to run or oversee makes this an important, as well as obvious, place to look.

Brief history

NAEP was included in the 1987-88 congressional reauthorization of the Elementary and Secondary Education Act. The National Assessment was revamped dramatically and the National Assessment Governing Board was created. A key reason why revamping NAEP and creating a new governing board have some bearing on the Common Core State Standards is that the most important change to the National Assessment in 1988 was to make it, at least part of it, a common assessment that could be used by states and that would yield state-level NAEP data that never before existed.

The Alexander-James study group that provided Congress with a blueprint for a substantially reshaped National Assessment of Educational Progress said that its “most important recommendation” was to create a state-level NAEP. This meant that states could use the National Assessment, in effect a “common assessment,” to get information that was comparable among states and linked to the results and content frameworks of the National Assessment.

A second key reason why NAEP and its Governing Board may have a bearing on the Common Core State Standards Initiative is what NAEP and NAGB have done over the past twenty-two years. The National Assessment’s results are more accessible, timely, and useful for policy makers and the public than before 1988, when the main audience for less timely NAEP data was a relatively small number of education researchers. The Governing Board deserves a share of credit for this as it took seriously the congressional charge to develop standards for reporting and disseminating results and to improve the form and use of the National Assessment.

Without focusing too much on similarities and differences, here are some of the actions taken to create and operate a new National Assessment that may bear on the Common Core State Standards and associated assessments.

Create an independent—as independent as possible—organization

When the NAGB was taking shape, first in the Alexander-James study group and then in Congress, many terms were used frequently to describe NAEP and, particularly, what would become its Governing Board: “strong, independent”; “powerful, independent”; “relatively independent”; “as independent as possible”; “an independent agency”; “independent judgment”; “free from inappropriate influences and special interests”; “buffered from manipulation.”

Working to achieve the right degree of “independence” in such an enterprise involves an imprecise mixture of political art and political science. A former U.S. undersecretary of education, reflecting on the National Assessment years ago, said it well when he observed that the challenge was “to create a quasi-governmental body that has true independence and, at the same time, has enough clout to get good appropriations.”

“Independence from” may be the key issue. For NAGB, being “free from inappropriate influences and special interests” was part of its congressional charge. The Alexander-James study group had wanted the new board to be “buffered from manipulation by any individual, level of government, or special interest within the field of education.”

For NAEP and NAGB, the independence issue has most often turned on the degree of independence from the federal government. The challenge has been to achieve a “national, not federal” assessment program with a very important “state” component. For the Common Core State Standards, the aim may better be described as creating a state-centric standards-and-assessment program with a very important “national” or “common” component.

The National Assessment Governing Board was created as part of a three-legged governance/operating system for NAEP. The three legs were the Board, the National Center for Education Statistics (part of the U.S. Department of Education), and the testing contractor that operates the National Assessment under contract with NCES.

On one central point, the recommendations of the Alexander-James study group (embraced almost in its entirety by the Senate) differed significantly from the final congressional action.

This was the authority of the new Board to govern or directly oversee the National Assessment. Alexander-James recommended a powerful, independent board that would directly oversee—truly govern—NAEP. Indeed, the Senate version called for the Board to “design and supervise the conduct of the National Assessment.”

But the House thought differently, and the Senate-House compromise that eventually cleared the Congress called for NAGB to “formulate the policy guidelines for the National Assessment.” Between “design and supervise the conduct of” and “formulate the policy guidelines for” is a long stretch of ambiguity.

As part of a three-legged governance system, the Governing Board does *not* actually govern or directly oversee the two other legs—the contractor(s) and federal agency that actually operate NAEP. The NCES commissioner, who is him/herself nominated by the president and confirmed by the Senate but whose agency is in turn overseen by the U.S. secretary of education and the director of the Office of Education Sciences, oversees the contractor(s) that operate the National Assessment.

The congressional compromise both created a new “governing board” *and* stated that the “National Assessment shall be placed in the National Center for Education Statistics and shall report directly to the Commissioner for Education Statistics.” This federal agency in turn selects, funds, and monitors the (private) test contractor(s) for the National Assessment.

Under its umbrella mandate “to formulate policy guidelines,” the Governing Board was specifically assigned responsibility for:

- selecting subject areas to be assessed;

- identifying appropriate achievement goals for each age and grade in each subject area to be tested under the National Assessment;
- developing assessment objectives;
- developing test specifications;
- designing the methodology of the assessment;
- developing guidelines and standards for analysis plans for reporting and disseminating results;
- developing standards and procedures for interstate, regional, and national comparisons; and
- taking appropriate actions needed to improve the form and use of the National Assessment.

That’s a lot—and the Board has been extremely influential—but it isn’t exactly “governing” and this three-legged arrangement could have led to serious conflict if not deadlock. That it hasn’t—or mostly hasn’t—is attributable not to statutory clarity but to the efforts of the individuals involved these past twenty-two years and their commitment to making things work. Still and all, the ambiguity and “unclear relationship” (one of the more tactful terms used by outsiders who have studied this set-up) are not a particularly good model for the Common Core State Standards and their assessments. The new venture should more closely track the Senate version of the 1988 NAEP authorization (which is not to say that CCSSI necessarily requires congressional action).

An independent governing board requires...a board

NAGB's membership and how it is appointed may have relevance for CCSSI. Congress created a modified Noah's Ark set of categories for membership on the National Assessment Governing Board in 1988, and has changed it only slightly in subsequent years. The legislation sought to comprise the Board in a way that would be balanced, diverse, and independent in its judgment.

The categories for board membership were:

- two Governors, or former Governors, who shall not be members of the same political party;
- two State legislators, who shall not be members of the same political party
- two chief state school officers;
- one superintendent of a local educational agency;
- one member of a state board of education;
- one member of a local board of education;
- three classroom teachers representing the grade levels at which the National Assessment is conducted;
- one representative of business or industry;
- two curriculum specialists;
- two testing and measurement experts;
- one nonpublic school administrator or policy maker;
- two school principals, one elementary and one secondary;
- three additional members who are representatives of the general public, including parents.

(The only changes in membership since 1988 have been to add a third testing and measurement expert, a fourth representative of the general public, and the director of the Institute of Education Sciences as an ex-officio member.)

The most important factor about NAGB's membership, however, is not something that can be legislated or mandated. This factor is that board members, whatever their background or category, must *not* see their role as representatives of specific groups, categories, or organizations. Rather, they are to function in the public interest, more as statesmen (or women) than as "representatives." And in point of fact, the Board generally managed to function that way and has received good marks for its members rising above positions of organizations, places, or parties with which they may be affiliated.

While the agreements that create a governance structure can anticipate and seek to address this matter, in reality it is a board leadership and board culture issue for which the board itself must take charge and take responsibility.

The appointment process for NAGB was revised by Congress in 1994 reauthorization but in practice has remained much as the 1988 legislation intended. The secretary of education has always made the appointments. The Governing Board has always recommended persons to the secretary for appointment (several persons for each appointment). Before 1994, the secretary was obligated by law to make appointments from among the Board's nominees. Congress changed the process in the 1994 reauthorization to increase the input from organizations and groups related to the categories of membership. Then secretary of education Richard Riley requested, however, that the Board continue to recommend candidates, by specified categories, for

consideration by the secretary. Riley's successors have continued this practice.

Recommendations to the secretary emerge from an extensive solicitation by the Board itself of suggestions from hundreds of organizations and individuals. While the secretary is no longer required to appoint members from the lists recommended by the Governing Board, secretaries have overwhelmingly made their appointments based on these recommendations.

Appointments to the Governing Board are for four-year terms (or to the portion of an unexpired term). Board members may serve two full terms and may complete their terms if they change jobs, retire, or leave office.

When it comes to CCSSI, the first decision is whether to build *any* structural relationship between it and the federal government. If federal funding is going to be required, then it may be risky to have no such relationship. If there is substantial federal funding over the long term, there will almost inevitably be some quid pro quo. For example, the secretary of education could choose board members from among individuals nominated by states.

This state-led effort might need an “interstate” clause to encourage, or require, that states recommend persons from other states whose work and leadership are recognized beyond their state's boundaries as well as such persons from their own state. It might be an unwieldy process, but a governing board for Common Core State Standards (and, perhaps, assessments, too) could be created from a pool of state-recommended nominees.

A board needs to be large enough, but ideally no larger

NAGB has twenty-six members. Not many organizational or management experts would recommend so large a board. But for “governing” a national effort with all of the factors to be

considered, “about two dozen” has worked well enough. This number allows for a system of *working* committees, and much of NAGB’s work is done in its committees. The group dynamics, even with more than twenty people at the table during (quarterly) meetings of the full board, have shown that members quickly reach a comfort level and do not hesitate to speak up as part of a full discussion of issues.

A governing board for CCSSI would also likely need to be larger than organizational experts might recommend. One obvious issue is whether there needs to be a member from each participating state. If so, then a board of two dozen could become a board of about four dozen and the dynamics would be very different. Moreover, if each state sends a member, the board may have difficulty getting beyond the expectation that members are there principally to “represent” their states rather than to govern a common venture.

Independence, board membership, appointments...and dollars

NAGB’s experience suggests that even a “quasi-independent” organization with a satisfactory appointment process and structure to address the work to be done must nonetheless be concerned about ... the money, specifically, how much and where it comes from. The NAEP program and the Governing Board are almost entirely federally funded. It is highly unlikely that they would exist without federal funding.

NAEP itself now costs about \$130 million annually. The Governing Board’s own budget—a separate line item in the Education Department budget—is now about \$9 million. These are not small sums, though they pale in comparison with what states now spend on their own testing programs. The architects of CCSSI’s long-term governing arrangement will need to carefully

consider its financing, whether it is relatively small (e.g., responsible only for the standards), medium size (perhaps standards plus various efforts to foster their implementation), or enormous, as it could become if CCSSI-aligned assessments replace states' own tests in many jurisdictions and if CCSSI itself is responsible for administering the testing program.

Even the most modest version, however, will carry costs and it's essential to consider how these will be met over the long haul. If by congressional appropriation, what does that portend for governance? If not by federal subsidy, then where will the money come from and under what kind of arrangement?

Funding for the National Assessment has increased dramatically as the scope of this program has widened. In the mid-1980s the cost of NAEP was about \$3-4 million per annum. But that was before there was a state-level NAEP (which now exists in all states under No Child Left Behind), before there were achievement levels or expedited reporting of results in the year the tests are given (or very soon thereafter), before there were readily available and widely shared curriculum frameworks, and before there was a "trial urban district assessment" grafted onto NAEP. Today's appropriation is thirty times as much, primarily because the NAEP program is so much more comprehensive.

As noted above, the costs of CCSSI and, especially, its aligned assessments could be enormous, but how much is needed for the "governing" arrangement depends very much on "who does what." Still, it's hard to see how this arrangement can endure over time in robust health absent any federal funding.

The amount of funding is of course critical, but in terms of having an organization that is as “independent as possible,” it also matters how the funding is allocated and through what channels it flows. One issue for NAGB has been that its funding (and that of NAEP itself) flows to the secretary of education who is then, in some sense, accountable for the use of these funds. This sets in motion the federal financial machinery that confounds and complicates the issue of the board’s independence.

When NAEP was in its formative years in the mid- and late-1960s, long before Alexander-James and NAGB, it was funded as a joint private-federal venture. Seed money from the Carnegie Corporation and Ford Foundation was critical to breathe life into the NAEP idea. Indeed, in NAEP’s earliest years the funding from these private sources *exceeded* the federal funding. But when NAEP shifted into a full-fledged operation, the federal funding in two years exceeded the total private funding for the first six years and the private funding then ceased. Private-public funding has been a catalyst for CCSSI and its aligned assessments, but NAEP’s history suggests that sustaining this enterprise over the long term with a blend of public and private dollars is not likely to succeed.

“Building a home”...or moving in with another family

One lesson of the National Assessment Governing Board and the organizational arrangements for NAEP that preceded it is that an enterprise with a complex and sometimes highly visible mission needs a home of its own.

In NAEP’s earliest days, before it had given its first test, its home was more like a room. Fortunately that “room” was in a small nonprofit organization headed by the late Ralph Tyler, an

iconic figure in American assessment. Soon thereafter, however, NAEP moved in with the Education Commission of the States (ECS), which turned out to be NAEP's home for more than a decade (1969-1983). During that time, NAEP became the largest project at ECS, accounting for some two-thirds of the total ECS revenue and staff. In time, the NAEP and ECS emphasis and missions got out of sync, and it was not surprising that ECS lost the NAEP program in 1983 to an Educational Testing Service (ETS) proposal that incorporated many innovations. As the largest testing company in the land, ETS had the resources to make the financial and organizational commitments required by the NAEP grant—and to agree to level funding (no inflation adjustment) for the five years of the grant.

ETS did a commendable job as the new NAEP contractor, including creation of an Assessment Policy Committee designed to obtain policy advice from education, government, and business leaders. This, however, also served to foreshadow the need for what would become the National Assessment Governing Board. NAEP was increasingly visible and its role as a key source of essential data for policy makers and the public—particularly in the aftermath of the 1983 *Nation At Risk* report—was recognized by ETS. But while the Assessment Policy Committee had outstanding members (including Lamar Alexander, the “Alexander” in Alexander-James), it remained an advisory group to the NAEP contractor and it was appointed by the NAEP contractor.

The National Assessment needed a “home” where it was the number one priority—and it needed a strong, independent board to look out for it. This was part of the aim of the 1988 legislation. CCSSI is likely to come to a similar realization.

As independent as possible...and a staff that works for it

NAGB, even with governors, legislators, chief state school officers, and state board members among others serving on it, would be like an airplane without radar if it did not have a competent, dedicated staff.

The Governing Board has been successful in recruiting and retaining staff despite the fact that being under the federal umbrella for personnel matters has not been helpful to the Governing Board. This success has been largely because of its mission and the organizational culture created by its leadership around this mission. From day one of the Governing Board, there was a sense that this was an important mission and a leading edge for education in the nation. The Governing Board has been a rewarding and professionally exciting place to work.

The mission of the CCSSI could likewise make for a rewarding and professionally exciting workplace. Highly competent staff could be attracted to the possibility of doing something that has never been done. For CCSSI with its state-centered mission, it is even more important that it not be required to operate under the federal personnel regulations. These federal regulations would run counter to its mission and its effectiveness.

Different challenges require a different and stronger board

For the CCSSI to do things that have not been done before will mean solving challenges similar to those faced by the National Assessment and the National Assessment Governing Board.

The twenty-year history of accomplishments by the National Assessment Governing Board and the forty-year history of successes and improvements in the National Assessment of Educational

Progress are impressive. They are more than impressive. Even so, they do not make the Governing Board the right “home” for the new Standards’ assessments program.

There are key reasons why the National Assessment Governing Board should not be asked to develop and oversee the CCSSI assessments. First, the Governing Board and NAEP began at a very different place than where the CCSSI began. NAEP was, and is, a federal program even with the addition of state-level NAEP. The cards are stacked in favor of the federal side for the Governing Board as it struggles to achieve the “national” emphasis in its title.

The CCSSI is state-centered, not federal. It will want assessments that are not federal and are not seen as federal. For the CCSSI to operate as state-centered, likely with federal funding, it will require a board that is stronger and more independent than the Governing Board.

Second, the CCSSI needs an organization—a board—that is *directly in charge* of developing and overseeing assessments. The Governing Board is not directly in charge and does not govern the National Assessment. The Governing Board could not be in charge of and directly oversee the CCSSI assessments if it is not in charge of and does not directly oversee the National Assessment. Such an arrangement would be unworkable. It would be wrong for CCSSI, and it would complicate and undermine NAEP itself.

The most important reason for not force fitting CCSSI into NAEP and the Governing Board may also be the most obvious to those who know NAEP best. NAEP, our only national assessment of educational progress, is an independent outside auditor that has credibility and integrity. This is a unique role for NAEP—and it is a role that the nation needs.

For NAEP and the Governing Board to be in charge of the CCSSI assessments would end NAEP's role as "independent outside auditor." NAEP and the Governing Board would become essentially both the states' "educational achievement accountant" *and* the "educational achievement auditor." Accountant and auditor: This is not an arrangement that works anywhere. This role for NAEP and the Governing Board as auditor is too important to be compromised or eliminated.

More than twenty years ago, Congress decided that a different kind of organizational arrangement was needed for the National Assessment of Educational Progress, and that this arrangement could not be achieved by simply making NAEP a part of an existing organization. An organization's value is sometimes underscored by claims that "if it did not exist we would need to invent it." In the case of the National Assessment Governing Board, it *did not exist* and it was invented.

The differences and similarities of NAEP/NAGB and CCSSI may be debated, but this need to have created—to have invented—their own organizational home is their fundamental similarity.