



STATE OF MICHIGAN
DEPARTMENT OF EDUCATION
LANSING

RICK SNYDER
GOVERNOR

MICHAEL P. FLANAGAN
STATE SUPERINTENDENT

April 22, 2013

Tom McMillin
State Representative 45th District
P.O. Box 30014
Lansing, MI 48909

Dear Representative McMillin,

As promised, below are the remaining answers to your inquiries surrounding the Common Core State Standards. We appreciate the opportunity your questions provide for us to continue to be transparent on the state's adoption and implementation of the Common Core State Standards.

Costs

1. Have there been any studies to determine the cost of implementing Common Core? If so, please provide it to members of the House Education Committee.

The Michigan Department of Education has not conducted any studies to determine the cost of implementing the Common Core State Standards. Implementation is the responsibility of local school districts, which have sole control over translating standards into fully articulated curriculum. Standards adoption and local school district implementation are routine exercises that occur regularly in Michigan as districts revisit their locally-developed curriculum and make use of new learning from research and best practice.

2. Please provide transition costs from Michigan Standards to Common Core Standards, both spent-to-date and projections for the next 5 years, including but not limited to:
 - a. Personnel including benefits
 - b. Consultants
 - c. Professional Development including replacement personnel during training
 - d. Technology
 - e. Payments to local and intermediate districts to help implementation
 - f. Materials
 - g. Other costs

The transition to the Common Core State Standards is the responsibility of local school districts, which have sole control over translating standards into curriculum. Transition costs for local school districts are not gathered or calculated by the Michigan Department of Education as standards implementation is a routine process, and the wide variance in local resources makes comparing costs difficult.

Testing Costs

1. What is the current expenditure for MEAP testing, including machine and hand scoring?

The current expenditure of \$29,205,418 for Michigan’s MEAP and MME assessments is based on actual costs for the most recently completed test cycles, spring and fall 2012. The total cost for mathematics and English language arts is \$21,051,235. Table 1 below shows the MEAP and MME grade levels assessed and per-student cost by content area and total.

Table 1.



2. Is MEAP test scoring outsourced or performed by MDE employees? If outsourced, please provide the name and cost of the vendor. Please provide annual development costs separately.

A blended approach is used for performing all work related to MEAP and MME assessments, including test scoring. Over the last decade, the State has developed and implemented customized systems that perform many test administration, scoring and reporting tasks in a timely and accurate, and more cost-efficient manner. This has resulted in bringing a number of complex test functions in house. Such decisions are based on who can perform the work most efficiently according to pre-established timelines and cost. Therefore, actual staff cost and benefits related to MEAP and MME are provided, as well as development, administration, scoring and reporting services that are primarily outsourced.

Administration, Scoring and Reporting Services Contractors

- ACT[®] provides the following grade 11 tests for MME:
 - a. Day 1—ACT[®] Plus Writing which includes reading, mathematics, science, and writing content;
 - b. Day 2—WorkKeys[®], which includes reading, mathematics, and social studies content.Day 3 supplements the Day 1 and 2 content, adding test questions in mathematics, reading, writing, science or social studies that are required to use MME results for the No Child Left Behind (NLCB) calculation of Adequate Yearly Progress (AYP) and accountability reports for high school. ACT[®] services are provided at an annual contract cost of \$11,078,278.
- Measurement Incorporated[®] provides MEAP and MME scoring and reporting services for the following: reading and mathematics in grades 3-8; writing in grades 4, 7 and 11; science in grades 5, 8 and 11; and social studies in grades 6, 9 and 11; at an annual contract cost of \$14,021,354.

Development Services Contractors

- Cheeney Media Concepts provides MEAP and MME (Day 3) accommodated assessment material services for the following: reading and mathematics, grades 3-8; writing in grades 4, 7 and 11, science in grades 5, 8 and 11; and social studies in grades 6, 9 and 11; at an annual contract cost of \$152,862.
- Data Recognition Corporation provides MEAP and MME (Day 3) item development services for the following: reading and mathematics in grades 3-8; writing in grades 4, 7 and 11; science in grades 5, 8 and 11; social studies in grades 6, 9 and 11 at an annual contract cost of \$2,692,169.

MDE Staff Cost and Benefits

- MDE staff cost and benefits are provided for MEAP and MME oversight at an annual cost of \$1,261,000.

3. What is the cost of Smarter Balanced testing, implementation and scoring?

To date, MDE has not expended any funds for Smarter Balanced testing. There is no cost for pilot and field testing online test items.

4. Please provide what has already been allocated in past years and what future costs are expected.

- MDE has not expended any funds for the Smarter Balanced testing in past years.
- For future costs, see response to Funding Source Question #3.

5. Please provide the names and costs of outside vendors that may be used for implementation or scoring.

The outside vendors to be used for implementation or scoring include the following:

- Smarter Balanced Assessment Consortium will continue to provide item development services and other assessment development benefits for the annual participation fee of \$9.55 per/student (see Funding Sources, question#2 below for additional benefits). MDE has estimated that 800,000 students (grades 3-8 and 11) will be participating in the Smarter Balanced summative assessment(s) at an Annual Contract Cost of \$7,640,000.
 - American Institutes for Research[®] (AIR) will provide for the online delivery, scoring of multiple-choice item and at the time of testing reports at an annual cost of \$3,191,000.
 - Measurement Incorporated[®] will provide scoring for constructed-response (open-ended) items using “artificial intelligence” (AI) scoring for all items, with 20% read-behind human scoring, and statewide reporting of test results at an annual cost of \$5,981,000.
6. Will any of the costs related to testing be charged to local or intermediate districts for either implementation or continued testing?

No costs related to implementation or continued testing will be charged to local or intermediate districts. Schools and districts may receive a number of benefits (see below).

Funding Sources

1. What is the amount of state funds that have been appropriated or requested from the budget to implement Common Core and Smarter Balanced testing? Please list separately the fiscal years 2009 to present 2013-14 budgets.
 - To date, no State funds have been appropriated or requested from the budget.
 - No State funds have been appropriated or requested from AY 2009 to present 2013-14 budgets.
2. What is anticipated to be requested in the 2014-15 budget?

The anticipated budget for implementing Michigan’s summative assessments (MEAP and MME), is based on actual contracted cost in the amount of \$16,812,000. This cost is based on recent competitive bids that were completed in spring 2013 for online delivery of assessments according to all MDE mandated requirements including use of print materials for all schools and districts that are not online-ready.

The Table 2 below shows the grade levels to be assessed and per- student cost by content area and total. The Cost Table 2 below, outlines the grade levels to be assessed and the per student cost by content area, including ACT[®] and WorkKeys[®] as stand-alone tests. For ease of comparability, Table 1 (showing current cost) has also been included. Table 2, Future Cost, includes Math and English Language Arts (reading, writing, listening and research) in grades 3-8 and 11; science in grades 4, 7 and 11; and for social studies in grades 5, 8 and 11. Additional benefits are noted below:

- Test development costs covered in the participation fee;
- Online testing engine;

- Computer Adaptive Testing;
- Faster, actionable results for teachers, parents & students;
- Expanding writing assessment from grades 4, 7, and 11 to grades 3-8 and 11;
- Expanding content covered in the English language arts test to include listening and research skills for the first time;
- Improved accessibility for special populations at a significantly reduced cost;
- Continued support of print-ready paper-and pencil testing for 3 years;
- Comparable summary results across states;
- Inclusion of standard-setting costs; and
- Flexible interim assessments providing multiple measures of student achievement throughout the year, giving student growth data to schools in order to support educator evaluations.

Table 1

CURRENT		COST PER STUDENT
Math	Grades 3-8 Grade 11	\$10.07 7 GRADE LEVELS
ELA Reading Writing	Grades 3-8 (Reading) Grades 4 and 7 (Writing) Grade 11	\$23.90 ALL GRADE LEVELS
Science	Grades 5 and 8 Grade 11	\$12.33 3 GRADE LEVELS
Social Studies	Grades 6 and 9 Grade 11	\$11.22 3 GRADE LEVELS
TOTAL		\$57.52
<ul style="list-style-type: none"> • Aggregate Program Cost: \$29,205,418 • Average cost for all grade levels with 11th grade ACT Plus Writing and WorkKeys included. • 100% pencil-and-paper assessments 		

Table 2

REPLACEMENT		COST PER STUDENT
Math	Smarter Balanced Grades 3-8 Grade 11	\$10.49 7 GRADE LEVELS
ELA Reading Writing Listening Research	Smarter Balanced Grades 3-8 Grade 11	\$15.84 ALL GRADE LEVELS
Science	Grades 4 and 7 Grade 11	\$6.24 3 GRADE LEVELS
Social Studies	Grades 5 and 8 Grade 11	\$6.15 3 GRADE LEVELS
TOTAL		\$38.72
<ul style="list-style-type: none"> • Aggregate Program Cost: \$24,723,887 • Average cost with 11th Grade ACT and WorkKeys included as standalone tests. • 100% online testing—additional costs if schools are not online-ready 		

3. What are the estimated ongoing costs annually for the next 5 years and what are the estimates based upon?

The estimated ongoing costs for all activities are based on MDE’s actual annual increases for 2009-12, which was 3 percent. The estimated annual budgets include MDE administration costs, technical systems support, administration of assessments based on the current score and reporting contract cost (bid in FY 2013), item development contract (bid in FY 2012), and assumptions of 100% online testing, 5% for Print testing, and considering only Smarter Balanced (mathematics and ELA) cost.

The projected costs for mathematics and ELA for the next five years include the following:

- **Current (Actual 2012) \$21,051,235.**
- **2014-15 / \$16,812,000**
- **2015-16 / \$17,316,000**
- **2016-17 / \$17,836,000**
- **2017-18 / \$18,371,000**
- **2018-19 / \$18,922,000**

4. Have any private or federal grants or funding been used to implement Common Core and Smarter Balanced testing by the MDE or local or intermediate districts? Have any other grant requests been submitted? Please specify amount of each grant.

MDE has not applied for or used any private or federal grants funding, for the implementation of Common Core or Smarter Balanced testing.

Local Costs

1. Has there been a cost study on the per pupil cost to local and intermediate districts related to Common Core or Smarter Balanced? If so, please provide it.

The Michigan Department of Education has not conducted a cost study on the per pupil cost to local and intermediate districts related to Common Core State Standards or Smarter Balanced (see Costs: responses to questions 1, 3 and 6).

Future Cost

1. What are the projected ongoing annual costs after implementation? Please include details as to what is included in these costs.

Please see question # 3 above under the Funding Sources Area.

Benchmarks

1. Please provide the following regarding the Common Core Standards:
 - a. Identify the countries' standards to which the Common Core Standards were benchmarked

This state-led initiative developed the standards from individual high-performing countries and provinces were used to inform content, structure, and language of the Common Core Standards. Writing teams looked for examples of rigor, coherence, and progression. The standards were compared to and built on existing standards developed by well-regarded states, countries, and national organizations including: California and Massachusetts math and ELA standards, The National Assessment of Educational Progress framework in math, reading and writing, Singapore and Japan math standards, and Australia, Canada, Finland, England, Hong Kong, Ireland, and Singapore standards.

<http://www.nga.org/files/live/sites/NGA/files/pdf/0812BENCHMARKING.PDF>

<http://www.nga.org/files/live/sites/NGA/files/pdf/1110CCSSIIMPLEMENTATIONGUIDE.PDF>

<http://achieve.org/CCSS-comparison-briefs>

- b. The academic studies on which the Common Core Standards were based

The Common Core State Standards were largely grounded in findings from a 2006 ACT study titled, “Ready for College Ready for Work: Same or Different.” Global studies showed that the United States was lagging behind its peers in career and college readiness. These studies prompted the US to adapt and adopt best practices to improve our education system. In the 2009 Program for International Student Assessment Report, U.S. students ranked 17th in reading and 31st in math. This report illustrated a performance gap among high achievers in the U.S. and high achievers in other developed countries leaves the U.S. about one full year behind.

<http://www.act.org/research/policymakers/pdf/ReadinessBrief.pdf>

<http://www.nga.org/files/live/sites/NGA/files/pdf/0812BENCHMARKING.PDF>

- c. All pilot studies of Common Core Standards prior to and since the approval by the State Board of Education

At this time there are no pilot studies of the Common Core State Standards. Standards are never field tested; rather they consist of desired outcomes based on best evidence and practice. The evidence of best practices support and reinforce that the Common Core will lead to career and college readiness for students.

- d. Include studies of the standards, and validation studies of professional development

At this time there are no studies of the standards or validation studies of professional development.

- e. All pilot studies prior to and since approval of the contract with Smarter Balanced Assessment Consortium covering all aspects of the test and validation of its alignment with Common Core.

There is no contract between the Smarter Balanced Assessment Consortium and the State of Michigan. The State has only signed a non-binding Memorandum of Understanding (MOU), which provides Michigan with the opportunity to substantively shape the development of the assessment system. The MOU is available at the link below.

http://michigan.gov/documents/mde/SMARTER_Balanced_Assessment_Consortium_MOU_323910_7.pdf

As part of this development process, Smarter Balanced is currently conducting a pilot test involving over 700 Michigan schools. Information from this event will be studied extensively and used to support the next phases of test development, which will include data on how Smarter Balanced test items function with Michigan students and alignment with the Common Core State Standards.

2. How will the impact of Common Core Standards on student achievement be measured and evaluated?

Standards are translated into curriculum by each local school district. The effectiveness of the curriculum design is the area normally subjected to study. The first indicators of success will occur at the classroom level with a local assessments conducted by the classroom teacher. From there, districts may choose to use formative assessments across grade levels to

determine student acquisition of the curriculum. The statewide assessment system also will inform the acquisition of skills and knowledge with the annual test.

3. Will they be compared to Michigan Standards?

A crosswalk of the Common Core State Standards and Michigan's Grade Level Content Expectations and High School Content Expectations was done during the development of the Common Core State Standards. The Common Core State Standards compares favorably with Michigan's existing content expectations.

4. Over what time period will these evaluations be made?

Classroom, building, district and state assessments of student acquisition of skills and knowledge are ongoing. Each student has differing needs and it is incumbent on the school to address the unique needs through differentiated classroom instruction. In order to tailor instruction to the student's needs, assessment in its many forms, creates the foundation for determining individual needs.

5. What are the pre-defined targets for success?

The target for success is that all students are able to graduate from high school ready to move to their selected career or preparation. A student will be able to enter the world of work, additional training, the military service, and the community or four year college system knowing that they have the English language arts and mathematic skills necessary to do so without remediation.

Freedom of Information

1. Will Michigan parents have access to all questions on the Smarter Balanced Assessments?

As has always been the case with the MEAP and MME, parents will not have access to secure test questions used for high-stakes purposes. States are required to administer these assessments in a secure manner to ensure that the results are fair and comparable across schools, districts and states. Releasing every item on a test has the deleterious effect of significantly increasing program costs of maintaining an assessment, as the entire bank of test items has to be re-developed every year.

However, Smarter Balanced will release many items over time that will be freely available to the public. For example, in October 2012 Smarter Balanced released over 50 sample items representing all grades, item types, and content areas that will be covered on the operational test. In addition, on May 29, 2013 Smarter Balanced will release a set of Practice Tests that will be available over the summer and throughout the next school year for parents, teachers, students and the general public to have opportunities to become familiar with all types of items. In the future, Smarter Balanced will release items as they are retired from secure usage on operational tests, to ensure that parents and educators continue to have access to a wide variety of items that were used in all grades and content areas.

2. Will teachers have access to all questions on the Smarter Balanced Assessments?

In addition to the opportunities described above, there are two pools of test questions for Smarter Balanced, secure and non-secure. For the secure questions, which will be used for the end of year accountability testing, parents, teachers and states will not be able to select or drop individual questions. This would introduce serious test security and comparability issues. However, all items that appear on secure Smarter Balanced tests will have gone

through multiple reviews by committees that include teachers and parents before they appear in front of students, in a manner similar to how that process currently works for MEAP and other state tests. For any non-secure Smarter Balanced testing, we are working with the Consortium to build in the ability for teachers to select individual items for tests they can use in their classrooms.

3. Will legislators or staff at MDE have access to all questions on the Smarter Balanced Assessment?

Legislators and most staff at MDE will have access to Smarter Balanced test items as described in the preceding responses. Select MDE staff, in addition to a number of Michigan educators, will have access to some Smarter Balanced questions as they are created and reviewed as part of the item development process, before they are used for secure testing purposes. This access will be based on their particular content area or test development expertise.

Data Collection and Storage

1. Will answers to Smarter Balanced Assessments be stored individually for each student?

Yes. Answers to Smarter Balanced test items will be collected and securely stored for individual students. This is necessary to compile and provide accurate achievement reports for students, educators and parents.

Who will have access to data collected from Smarter Balanced Assessments?

Only State Education Agencies such as MDE will have access to Smarter Balanced tests data that is connected to individual students. Districts and educators will have access to student-identifiable data for the students they are responsible for serving, as currently is the practice with statewide testing.

2. Does the Federal Government or other third parties have access to student answers?

The federal government is only provided with aggregate, summary data that does not include individual student scores or any way to identify individual students. If the federal government, or any other third party, such as researchers, were to request any such data, it would only be provided in a manner such that individual students cannot be identified. States are required to guarantee this level of individual student data privacy under the FERPA.

3. What specifically is being done ensure individual student data and privacy is protected?

Michigan collects individual student-level data and has since 2002 through the Center for Educational Performance and Information (CEPI). All data is collected, stored, and shared in a manner that is fully FERPA compliant. Neither Smarter Balanced nor Michigan will provide data to third parties for purposes unrelated directly to intended educational uses.

NCLB Waiver

1. Why did the State Board of Education choose Common Core standards or MI Grade Level Content Expectations (GLCE) and High School Content Expectations (HSCE) when applying for NCLB waiver?

The State Board of Education adopted the Common Core State Standards in June 2010. It is important to know that ESEA waiver opportunities for states were not announced by U.S.

Department of Education until the end of 2011. Thus, no decision regarding the adoption of the Common Core was based on preparing a request for ESEA Flexibility.

2. When does the current waiver expire?

The ESEA waiver has been granted through the end of the 2013-14 school year. The MDE has the ability to apply for an extension at that time.

State Control of Common Core Standards and Testing

1. What is the mechanism for the State of Michigan to change a Common Core Standard? Note: This is not a reference to adding 15% to the standards, but changing a standard we disagree with.

That opportunity existed prior to the adoption of the standards. Through numerous opportunities for public input and a final review required by the State Board of Education prior to consideration for adoption, the Department and the State Board of Education were satisfied that the standards needed no changes.

As has been the case with all sets of content standards, the Common Core Standards will be updated periodically. The National Governor's Association and Council of Chief State School Officers have made a commitment to keep this process state led, with no involvement from the federal government. When the Standards are revised, Michigan will have numerous opportunities for State Education Agency (MDE) and public comment to advocate for changes in any standards we disagree with.

2. What is the mechanism for the State of Michigan to change a question on the Smarter Balanced assessment?

Michigan will have multiple opportunities to contribute to the development of test questions throughout the item development and review process. Michigan can ask to have test items reviewed and removed if necessary, so that it does not appear during future test events.

3. If Michigan decides it doesn't like a standard and we refuse to teach it in Michigan schools, will it negatively affect our student's scores on Smarter Balance assessment tests?

The Smarter Balanced assessments will measure the breadth of the Common Core State Standards. While this means that untaught standards might put students at a disadvantage on specific test items measuring those concepts, covering the breadth of the standards means that this impact would be minimal.

4. Please provide the date that the State Board of Education approved the Common Core State Standards and the date they joined the Smarter Balanced Assessment Consortium.

The Common Core State Standards were adopted by the State Board of Education in June 2010.

Michigan joined Smarter Balanced in June 2010.

http://michigan.gov/documents/mde/SMARTER_Balanced_Assessment_Consortium_MOU_323_910_7.pdf

Michigan Law

1. Please describe how compliance with Michigan law will be ensured with the implementation of Common Core State Standards. Include but do not limit your response to:

- a. The Michigan School Aid Act

The State School Aid Act contains a number of provisions that call for summative assessment measures. Valid and reliable summative measures of student performance will continue to be available once the Smarter Balanced summative assessment system is implemented.

- b. High School Graduation requirements

The Michigan Merit Curriculum already is highly aligned with the Common Core State Standards.

- c. Open Meetings Act

State Board of Education meetings when these initiatives were reviews and adopted are compliant with Michigan's Open Meetings Act.

- d. Michigan School Code 380.10, The Parental Rights Act

The adoption of the Common Core State Standards to replace the Grade Level Content Expectations/High School Content Expectations does not change the parental rights outlined in MCL 380.10.

- e. Michigan School Code 380.1279c prohibiting the use of assessments to measure pupils' values or attitudes.

As Michigan's current summative assessments do, the Smarter Balanced summative assessments will measure student learning and abilities; they do not measure student's values or attitudes.

Again, we thank you for the opportunity to be straightforward and transparent on the Common Core State Standards. Please do not hesitate to contact Wendy Larvick, our Legislative Liaison, with any additional questions or concerns. She can be reached at 517-241-4993 or LarvickW@michigan.gov.

Sincerely,

Marty Ackley
Director
Office of Public and Governmental Affairs