Introducción

Este número de JPAM inaugura una nueva característica, “Punto/Contrapunto,” en la que dos investigadores sociales de la política de la sociedad hacen comentarios sobre un tema importante, relacionado con la política y la gestión pública. Se tratará no sólo de los temas y las cuestiones de la política y del análisis de la gestión pública, sino también de los métodos y usos de la política y la gestión pública. La idea es enfocar en un tema sobre el que los investigadores y los académicos pueden relacionarse para aclarar un tema importante. En el espacio y el tiempo que se consideran, las argumentaciones presentadas serán más generales y informales que lo que se presentaría en un artículo de una revista. Tomando en cuenta el espacio y el tiempo, se consideró que las argumentaciones presentadas serán más generales y informales que lo que se presentaría en un artículo de una revista. Este primer “Punto/Contrapunto” se refiere a si y de qué manera el gobierno federal debería o no estar involucrado en la responsabilidad de la escuela, un tema que se hizo prominente por la aprobación de la Ley de No Child Left Behind Act of 2001. Los autores son Eric A. Hanushek en favor y Richard Rothstein en contra. Cada uno fue allocations 2,000 palabras. En un esfuerzo por dar coherencia a este debate, Hanushek escribió primero y Rothstein segundo, con Rothstein teniendo en mano el artículo de Hanushek. Cada uno escribió un comentario de contraposición, con Hanushek escribiendo un largo comentario de contraposición como compensación por estar dispuesto a ir primero. Eric Hanushek es un senior fellow en la Hoover Institution de Stanford University y un investigador líder en la economía de la financiación de la escuela. Richard Rothstein es un investigador asociado en el Economic Policy Institute, y...

WHY THE FEDERAL GOVERNMENT SHOULD BE INVOLVED IN SCHOOL ACCOUNTABILITY

Eric A. Hanushek

Americans are frequently surprised to hear that United States schools are not the best. Indeed, the typical American believes that U.S. students both attend very high-quality schools and receive the most education. The available evidence, however, suggests that both perceptions are wrong: Many other countries now provide more schooling while their students outscore U.S. students by a wide margin. Given that, what should and can be done? And, importantly, is there a central role for the federal government?

BACKGROUND

The United States has led the world in economic growth and development and, thus, the well-being of its citizens. Virtually all economists would identify the investment in human capital over the last century as a key ingredient to this growth. And, recent research suggests that an extremely important element in the human capital of a nation is the quality of its schools as measured by mathematics and science skills (Hanushek & Kimko, 2000).

Similarly, individual incomes are highly dependent on human capital measured by both quantity and quality of schooling. Specifically, cognitive skills assessed by standardized tests show a powerful influence on income differences. This influence comes directly through the effect on earnings and indirectly through educational attainment (Hanushek, 2004).

National growth and the distribution of skills in society combine to determine both the level and distribution of economic outcomes. Thus, it is possible to see how the quality of the nation’s schools has long-term impacts on society.

Of course, while the impact of cognitive skills is clear and unmistakable, nothing denies that other attributes—physical skills, personality traits, or what-have-you—may also influence individual success. Nor does it deny that other attributes of the economic system—competitive labor and product markets, natural resources, or well-developed property rights—are also influential in terms of national growth. It does say that, given other favorable conditions, skills have a significant impact on individual and national economic performance.

The typical parent recognizes the importance of schooling. Families are prone to move, if they can, to where they believe schools are good. The typical parent also believes that his or her child's school is quite good—a B+ (Rose & Gallup, 2001). Moreover, the common understanding is that U.S. students obtain more education through a more developed college system than is available anywhere else. Thus, there is a smugness about U.S. schools—and especially one’s own school.

Unfortunately, these judgments about U.S. schools are incorrect and are becoming farther from the truth every year. While once unsurpassed, the expected schooling
level of young Americans now ranks 14 out of 27 countries tracked by the OECD (Organisation for Economic Co-operation and Development, 2002). On perhaps a more important dimension, across 40 years of international testing, U.S. students have consistently fallen below the median, a result of true performance differences and not of any differences in the representativeness of those being tested (Hanushek & Kimko, 2000).

Finally, neither lack of trying nor lack of support for schools has led to our current situation. Between 1960 and 2000, spending per student adjusted for inflation over tripled. But the performance of students has remained essentially flat from the first testing of a representative sample of high school seniors in 1970 through today (Hanushek, 2003). Moreover, the gaps in achievement by race and ethnicity, while closing some in the 1980s, actually widened in the 1990s and remain unacceptably large.

STANDARDS AND ACCOUNTABILITY

After decades of an absence of measurable improvement from added resources and a variety of prior reform ideas, the nation embarked on a significantly different school reform effort in the 1990s. First, following confusion about what was to be taught and considerable heterogeneity in the materials that were delivered across classrooms within and between states, a movement to set standards for student outcomes throughout the schooling years took hold. Second, a number of states introduced extensive testing programs, as a direct means of assessing whether students achieved these identified skills. Finally, some states even set rewards and sanctions to go with the measured performance of schools.

The movement toward increased accountability of schools gained momentum throughout the 1990s. While only 12 states had accountability systems at the school level in 1996, 39 states did so by 2000. These systems were (and remain) quite heterogeneous, relying on different tests, different methods of assessing performance, and different rewards and sanctions for performance.

Following the perceived success of early-adopting states, testing and accountability became a centerpiece of George W. Bush’s presidential campaign and on his election, became an early legislative priority. The No Child Left Behind Act of 2001 (NCLB) emphasizes the importance of student achievement and establishes the requirement that all states develop outcome-based accountability systems by 2006. In addition to developing ambitious goals for achievement of all children, it also sets out a series of school rewards as well as sanctions for schools that fail to make progress toward such goals.

THE FEDERAL ROLE

Of course, failure of schools does not necessarily mean that the federal government should step in. Indeed, a traditional Republican Party position has been that the federal government should have a limited role, particularly in education and other areas where the states have long had primacy.

The argument for federal involvement is, however, clear—and falls directly in line with traditional places for centralized governmental policies. School quality is undeniably important for the nation with future economic success depending directly on the quality of our schools. As noted, not only individual incomes but also the future growth of GDP are related directly to the knowledge and skills of the overall population. Moreover, the skills observed to count in the marketplace are the ones forming the basis for school accountability. Promoting a strong economy is an obvious place for federal leadership.
States and localities will not necessarily make the best decisions for the nation, because they do not take into account the implications of the high mobility of the population. Many students will move after schooling, implying that the states making the investment will not fully see the future benefits. Nor will states properly consider the implications of having many poorly educated citizens and workers. The politics of state and local school decisionmaking further complicate the situation. Voter apathy in local school elections magnified by the significant involvement in state and local politics of teacher unions—with their conflicting self-interested and social goals—leads to very predictable distortions in school policy away from any focus on measurable outcomes and toward more spending on the current institutions. The federal government offers a natural counterbalance to these forces.

Finally, the federal government has historically taken an interest in issues of income distribution and the protection of children from disadvantaged populations—the group most hurt by the past shortcomings of our schools. The big change with NCLB is a focus on outcomes for poor and minority students instead of sticking just to the traditional focus on passing extra money to schools serving disadvantaged students. The federal government rightfully sets the goals for what is to be achieved, while the states and localities retain their appropriate role in deciding how best to achieve improved outcomes.

EMPIRICAL UNDERPINNINGS OF SCHOOL ACCOUNTABILITY

At the introduction of the first accountability systems the arguments were all conceptual—much like many of the now discredited ideas previously guiding education. They did differ somewhat dramatically from previous policy proposals in that they focused on what we care about (outcomes) and not on more distant issues (inputs). Nonetheless, the proof is in the results, and concern is not the same as having a positive impact.

We now have direct evidence that school accountability leads to positive results. In an analysis of state differences in student performance on the National Assessment of Educational Progress (NAEP), Hanushek and Raymond (2004) show that states adopting accountability systems have shown better performance. However, this better performance only results from accountability systems that attach consequences for performance to the schools. Consequences have actually ranged broadly, including such things as monetary awards to schools and teachers, the threat of state take-overs of failed schools, or—in the case of Florida—the provision of vouchers to students trapped in failing schools. Systems that merely report results do not achieve the same gains. Thus, the results of prior state policies support the NCLB move to apply rewards and sanctions to school performance including those of expanded choice of schools.

Obtaining measurable results differentiates school accountability policies from the long string of prior “fixes,” including a variety of specific programs, of resource enhancements, and the like. The results indicate that states introducing consequential accountability showed improvements of some 0.2 standard deviations in eighth-grade NAEP scores over those that did not employ consequential accountability (holding other things constant). No other policy of the last decades has shown a similar sustained improvement for broad population groups.

Interestingly, these gains have also come from accountability systems that are not particularly well-designed in terms of separating the influences of schools from other influences such as family backgrounds. By concentrating on aggregate student performance instead of just the value-added of schools, the accountability systems provide rather blunt incentives to schools. Additionally, the best set of rewards
and sanctions has yet to be studied. Addressing these design shortcomings are likely to lead to even more significant improvements in student results.

**SOME REMAINING ISSUES**

The success of school accountability systems does not deny that there are potential improvements to be had. Indeed, NCLB should be viewed as an important starting point that can be built upon to lead our schools to even greater improvement.

First, for historical and political reasons, accountability relies upon individual state testing and standards. A case can be made, however, that educational performance must be placed within a national labor market where there are common skills that are required—thus suggesting a move toward more consistent national standards and assessment or at least a core of key competencies.

Second, NCLB includes a variety of specific, intensely discussed details that point to potential improvements. These requirements were largely political concessions that were required in order to secure passage of the legislation, but several rest on faulty or untested assumptions about their association with student improvement. The open-ended requirement mandating that all states provide a “highly qualified” teacher for all students has promoted an undesirable reliance on current certification requirements and has not directly linked teacher quality to student performance. In addition, NCLB tacitly endorses an inconsistent (and in some cases flawed) set of performance measures in current use by states. The tracking of school improvement through the standards of “adequate yearly progress” has ignored information about individual student gains and has relied upon unreliable changes in aggregate scores. The emphasis on whether students “pass” or “fail” a state test does not provide sufficient incentives for student learning across the entire spectrum of student performance. The pass/fail emphasis also simultaneously highlights and magnifies the importance of differences across states in the stringency of standards.

Third, accountability cannot solve all problems. For example, while accountability has been shown to lift the performance of all students, it has done so differentially. The state systems of the 1990s had their greatest impact on Hispanic students but less on whites and even less on blacks. Thus, achieving more even outcomes in terms of black-white gaps will still require additional effort and policies.

Nonetheless, while accountability as written into federal law with NCLB can be improved, the existing system offers considerable real improvement over the stagnant schools of the past decades. Not only is the system raising overall student performance, it is also directing attention at a portion of the educational distribution that has long been impervious to policy—the most needy and most disadvantaged. And, importantly, it concentrates on performance instead of simply providing excuses for why these students cannot be educated even with extra funds.

Much of the outcry about school accountability can be attributed directly to school personnel preferring not to have any assessments of their performance. The rallying cry of “we are for accountability but we should not require it until we have perfected the system” is largely a ploy to stop judging schools on the basis of their outputs. The argument that the federal government has not sufficiently funded the required improvements not only distorts reality (Peyser & Costrell, 2004), but attempts to seek rewards for inefficient use of school resources. The recognition that children from disadvantaged backgrounds are most in need of improved school opportunities is not reason to shy away from accountability—rather, it is a good reason for pursuing accountability with vigor. NCLB has changed the character of debate from excusing bad results because students were disadvantaged to focusing attention on the education of previously neglected students.
Current testing can be improved. Current accountability systems can be improved. The schooling results for disadvantaged students can be improved. Indeed, these are all reasons for further federal leadership, because the education of our children is truly important for all of society. To be competitive as a nation we clearly must improve our schools to the levels found in the many developed and developing countries whose students currently outperform our students by a wide margin. Moreover, to provide the opportunities for all that we are committed to as a nation, we must ensure that our schools serve all children, that is, no child left behind.

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WHY THE FEDERAL GOVERNMENT SHOULD NOT BE INVOLVED IN SCHOOL ACCOUNTABILITY

Richard Rothstein

Eric Hanushek argues that:

1. educational failure undermines our economic welfare;
2. previous school improvement efforts have failed—test scores stagnated despite higher investment;
3. states will not spur improvement because benefits are external (students may emigrate), so the task should be federal;
4. recent federal accountability efforts have been successful, validating this approach.

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Hanushek's first three points exaggerate problems we face, laying a flawed foundation for federal control of education. And although I concur with his desire for better schools, I conclude that federal accountability has sabotaged that goal. I address the first points briefly before discussing the harmful new federal accountability system.

**DO SCHOOL SHORTCOMINGS UNDERMINE ECONOMIC WELFARE?**

Hanushek overstates the claim that school shortcomings undermine economic welfare. While some nations surpass U.S. attainment levels, the optimal choice is not unlimited attainment: Today's youth will enter a workforce in which 21 percent of openings will require a bachelor's degree (Hecker, 2001, Table 6) while 28 percent of young Americans now earn such degrees (Stoops, 2004, Table A), a share projected to grow (Day & Bauman, 2000). Student scores in some nations surpass those here, but the picture is mixed—Americans rank at the top on an international reading test (Elley, 1992) and in the middle on several others (Lemke et al., 2002). Leaders of nations (Japan and Korea, for example) with higher math and science scores publicly disparage their own performance and urge curricula that de-emphasize standardized tests to become more well-rounded like, they say, America's (Sato, 2000; Lee, 2001).

We should be skeptical of claims that fine distinctions in learning affect national economic success. The drive to federalize education policy began in the late 1980s when import competition suggested to some that superior schools caused foreign workers' productivity growth. Yet when Japanese and European economies subsequently stagnated and American productivity soared, few credited better American schools. Clearly, macroeconomic policy was most important, and relative educational quality (within industrialized nations' narrow range) did not affect economic performance. Nonetheless, with American fiscal deficits, interest rates, and dollar values now rising, we can soon expect to hear again that inadequate schools retard economic growth.

**HAVE PREVIOUS SCHOOL IMPROVEMENT EFFORTS FAILED?**

The claim that previous school improvement efforts have failed is also exaggerated. While Hanushek properly says education spending has grown, his estimate of a tripling relies on an inappropriate inflation adjustment that ignores effects of "Baumol's disease" on costs of labor-intensive services like schools. Real new spending to improve regular academic outcomes has been modest, as most increases have gone for special populations—the disabled, for example (Rothstein & Miles, 1995).

Hanushek acknowledges that the achievement gap closed "some" in the 1980s; in fact, when spending grew most rapidly, the black-white gap was halved, a very substantial improvement (Grissmer, Flanagan, & Williamson, 1998).

**CAN STATES BE TRUSTED TO IMPROVE SCHOOLS?**

Education has historically been a state and local, not federal, responsibility, with benefits for civil society. Except in the largest cities (and states with county-wide districts), democratic participation flourishes most in school politics. Perhaps as a result, Americans typically are satisfied with their schools (as Hanushek notes).

There is no evidence that states hesitate to improve schools, fearing an inability to capture externalities. States with better schools (measured by test scores) often are
those exporting more educated workers—Wisconsin, Minnesota, Iowa, for example. These states maintain fine schools because an involved citizenry demands that government educate their children well, no matter where those children settle as adults.

**HAVE FEDERAL ACCOUNTABILITY EFFORTS BEEN SUCCESSFUL?**

Abandoning local control is dangerous because pedagogy is complex, with few final answers and a need for experimentation. Standardization, an unavoidable byproduct of federalization, can easily level school quality downward. Federal sanctions have done more harm than good since 1990, though they have done some of both. Accountability rules have forced some schools to pay more attention to basic skills for disadvantaged students, but have also created incentives to narrow curricula so that little more than basic skills will be taught to many students.

The “No Child Left Behind” law (NCLB) that Hanushek praises requires states to make all students “proficient” in math, reading, and science by 2014. Considered separately, racial minority, low-income, and learning-disabled children must also achieve proficiency.

Aiming for schools to narrow the test score gap is a worthy goal, but federal law makes the absurd demand that it be rapidly eliminated without any attention to social policy. No matter how well schools teach challenging subject matter, student mastery will be distributed somewhat normally. Because learning stems partly from non-school influences (such as parents’ literacy and values, economic security, and health status), typical achievement of disadvantaged students is inevitably bunched below mean achievement of all students. Hanushek himself has shown that greater residential mobility of black students (perhaps from high housing costs) is alone responsible for 14 percent of the racial test score gap (Hanushek, Kain, & Rivkin, 2004). Or consider that low-income students typically have less adequate pediatric care and so miss 30 percent more school (Starfield, 1997)—differential attendance also contributes to the gap. Compounding the many home background influences, a test score gap is inevitable. Indeed, race and socioeconomic gaps are firmly established by age three, before exposure to school (Lee & Burkam, 2002).

The NCLB goal necessitates manipulation of subjective “proficiency” definitions that are unfit for legislative mandate. The scientific community has consistently denounced federal definitions as politically motivated. For the National Assessment of Educational Progress (NAEP), a federal test, citizen panels judge how well “proficient” students should perform. Yet adults, even the most sophisticated, have difficulty envisioning distributions and typically define minimum requirements that are too high for many students to achieve.

The General Accounting Office (1993) charged that technically flawed federal definitions were deliberately adopted to send a dire message about school achievement. A National Academy of Education report said student achievement had been condemned using “unreasonably high” standards (Shepard et al., 1993). A National Academy of Sciences panel summarized,

> [T]his committee [and] other evaluators ... have judged the current achievement-level-setting model and results to be flawed ... [P]rocesses are too cognitively complex for the raters, and there are notable inconsistencies in the judgment data ... Furthermore, NAEP achievement-level results do not appear to be reasonable compared with other external information about students’ achievement (Pellegrino, Jones, & Mitchell, 1999, p. 7).

Federal law now requires each state to conduct its own level-setting exercise, with predictably silly results. For example, 28 percent of Arkansas fourth graders are
proficient readers by NAEP standards, but 61 percent are proficient by Arkansas’ own definition. For Florida, it’s 32 percent proficient by federal standards, 60 percent by state; for Iowa, 35 percent vs. 76 percent; North Carolina, 33 percent vs. 81 percent; Wisconsin, 33 percent vs. 80 percent; and for Texas, whose system inspired NCLB, it is 27 percent vs. 85 percent. These gaps will grow as states “game” the rules by reducing their own proficiency definitions to avoid sanctions. Shouldn’t a federal mandate this capricious be withdrawn?

Federal micromanagement of school performance requires great precision in test scores. Yet with real performance constant, a school’s average scores can vary year to year from sampling or measurement error. (Ask any teacher if this year’s class can be “better” than last year’s demographically identical group.) Still, the federal system imposes sanctions for successive cohorts’ tiny proficiency changes. Statistical difficulties are exacerbated because of the law’s laudable intent to hold schools accountable for minority group performance. Because subgroups are smaller than entire schools, minority scores are subject to greater inaccuracy. A perverse consequence is that schools with more diverse populations are more likely to be deemed failing.

While the administration was designing NCLB, Thomas Kane and Douglas Staiger (2002) circulated analyses showing that the proposed system would result in many schools sanctioned solely from statistical error.1 The bill was delayed for months while administration experts tried to address the problem. Failing, they introduced the bill anyway and the result has been some schools rewarded one year and punished the next with no underlying change in effectiveness, and the same schools rewarded under state systems while punished under the federal one.

The system’s most serious flaw, however, is its holding schools accountable for only a few of the many outcomes we should expect. State courts, public opinion polls, and Congress itself (in “Goals 2000” legislation) have insisted that schools teach not only basic but advanced academic skills, employment-related behaviors, citizenship, fitness and health, artistic sensibility, and social ethics. But only basic math, reading, and science are inexpensive to measure with standardized assessments, so these are the only skills federal law demands.

Proponents of this policy argue that unless students are proficient in basic skills, they waste time attempting higher skills. But effective teaching entails teaching basic and higher skills simultaneously—they reinforce each other. With a reading passage, a child need not successfully recall every detail (a basic skill) before being taught to write in response to the theme (a more advanced skill). Because the former is easier to test, federal sanctions ensure its emphasis. With incentives to raise only basic skills, schools have reduced or eliminated creative writing, art, music, physical education, and social studies. Is setting a precise balance between these subjects a decision Congress should make (based on ease-of-testing), rather than permitting localities to experiment with alternative approaches?

Standardized tests can be designed to hold schools accountable for higher skills (creative writing, for example). Teachers would then have to stress such skills. But tests of higher skills, like creative writing, take more time, sacrificing instruction. Independent readers must be trained to ensure consistent grading. This requires spending considerably more on testing than we do now.

Federal incentives also encourage teaching to only a few students, those otherwise scoring just below proficiency, because only their gains enable schools to escape sanctions. Under NCLB, instructing already proficient students is a low priority.

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1 The version circulated in the summer of 2001 was an earlier draft of the published paper.
Hanushek is right that state and local education policy can be corrupted by special interests. But federal policy can be and is dominated by partisan ideologues and academics (like him and me) who never have to face the consequences of their recommendations. State and local education politics tend to be more bipartisan and pragmatic. On balance, we’re better off with imperfect local control.

Still, federal policy could have an important role, one presently ignored. Although externalities do not discourage states from improving, some states have greater fiscal capacity to finance education. The federal government should distribute education funds to states where real personal income per child is relatively low, and especially where it is low relative to the number of disadvantaged children. Presently, the federal government exacerbates inequality, because per-pupil dollars distributed under NCLB are scaled to state per-pupil spending. Even after regional cost adjustment, poor children in Connecticut get more federal aid than poor children in Mississippi. To reform federal education policy, this would be a good place to start.

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It is foolish to argue that either individual citizens or the aggregate U.S. economy is unaffected by the unmistakably low relative achievement of its students. Overwhelming evidence suggests that the skills measured by the standardized tests—the cornerstone of current accountability systems—are extraordinarily important in determining economic success.

In the policy details, it takes a little effort to sort through the confusion in Rothstein’s attack on NCLB. For example, Rothstein provides a lengthy discussion about how the NAEP proficiency levels are too high, but then also blasts states for not currently demanding such levels of performance. He also misses the central feature of school accountability. Local control over decisions is fully maintained as long as the local districts demonstrate good performance. The federal policies specify student outcomes that should be obtained but not how the districts (or states) respond. If students are being shortchanged, the policies emphasize providing options to the students—as opposed to protecting and rewarding the poorly performing schools.

Rothstein and I agree that we should improve our testing and that we should provide incentives for better performance across the entire spectrum of cognitive skills. But these arguments do not deny that emphasizing achievement of disadvantaged students on basic skills initially is important for our society.

Rothstein’s “liberal” arguments for abandoning accountability are particularly disturbing. Rothstein argues: (1) we have probably promoted too much education; (2) disadvantages of birth and background make it impossible to bring significant numbers of minorities up to basic skill levels, at least in the foreseeable future; and (3) the tests are narrow and overly concentrated on low-level skills, distracting schools from providing a wider, richer, and more creative curriculum. One hears echoes of the “Scarsdale parent” position that we should not bother testing for basic skills because such tests are not relevant for their children. It also fits nicely into a continuing excuse for low-performing schools because disadvantaged students enter school less prepared and face greater challenges. If ratified in policy, this position would ensure that existing distributional inequities are reinforced and maintained for generations.

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Without doubt, NCLB has focused attention on improving the performance of the most disadvantaged. When schools could choose to provide a wider, richer, and more creative curriculum—which for the most part they still can—they have systematically neglected even basic skills for the most needy students.

REJOINDER

Richard Rothstein

Eric Hanushek agrees “we should provide incentives for better performance across the entire spectrum” of outcomes schools should produce. But he can’t logically maintain this while also supporting a federal accountability system that incentivizes only a few of these outcomes.

Incentives, if they work, direct institutions away from activities that are not rewarded, toward activities that are. If schools do not respond to federal incentives by de-emphasizing all but easily tested basic skills such as computation, decoding words, and memorizing science facts, the accountability system would be a failure.

Hanushek is wrong that “first” emphasizing basic skills for disadvantaged students is important for society. Employers consistently report that high school graduates, particularly black graduates, are unemployable primarily because they lack communication skills, ability to work in teams, flexibility, and problem-solving habits—not computational facility and literacy. Youths need better basic skills, too, but not to the exclusion of other competencies.

I do not argue, as Hanushek charges, that we promote too much education. We need more and better education to improve the quality of our civic participation and to enrich the cultural and intellectual lives of our citizens as well as to enhance our productivity. But there is no competitiveness crisis that requires a federal takeover of our traditional state and local control of schools.

A state and locally administered accountability system could incentivize a balanced curriculum, but it can’t do so with easily quantifiable standardized assessments. It would require something like an accreditation system, with visiting teams of professional educators and public representatives, able not only to interpret test scores but also to review student writing, listen to student presentations, and assemble other outcome data (for example, judging social studies instruction partly by graduates’ subsequent voting participation). Such accountability teams would be costly, would require non-standardized judgments, and cannot be administered from Washington.