



Commonwealth of Pennsylvania
STATE BOARD OF EDUCATION

December 6, 2005

Dr. Melody Wilt
Director of Curriculum
Chester County Intermediate Unit
455 Boot Road
Downingtown, PA 19335

Dear Dr. Wilt:

Thank you for your letter of November 28, 2005 from the Chester County Administrators on proposed 22 Pa. Code, Chapter 4, academic standards and assessments.

Your letter is considered as official public comment and is being shared with all members of the Board. Pursuant to the provisions of the Regulatory Review Act, copies of your comments are also being provided to the Independent Regulatory Review Commission (IRRC) and the Chairpersons of the House and Senate Education Committees.

The regulatory Review Act provides that information on proposed and final regulations be mailed to public commentators at their request. If you would like to receive the final-form of these regulations when they are finalized, please make your request to me in writing at the address printed below.

Sincerely yours,

Jim Buckheit
Jim Buckheit
Executive Director

cc: Members of the State Board
Senator Rhoades
Senator Musto
Representatives Stairs
Representatives Roebuck
IRRC



Chester County Intermediate Unit
455 Boot Road
Downingtown, PA 19335
484-237-5000

F A X C O V E R

Date:	NDecember 2, 2005
Send to:	Jim Buckheit, Executive Director
Organization:	State Board of Education
Phone number:	
Fax number:	717-787-7306
From:	Melody Wilt/Robin Romanelli
Office location:	Chester County Intermediate Unit
Phone number:	484-237-5094

URGENT REPLY ASAP PLEASE COMMENT PLEASE REVIEW FOR YOUR INFORMATION

TOTAL PAGES, INCLUDING COVER:

3

Comments:

Chapter 4 – State Board of Education Proposed Regulations from Dr. Melody Wilt.

Melody Wilt, Ph.D.
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Chester County Intermediate Unit

November 28, 2005
Mr. Jim Buckheit, Executive Director
Pennsylvania State Board of Education
333 Market Street
Harrisburg, Pennsylvania 17126-0333

Dear Mr. Buckheit:

CHAPTER 4 – STATE BOARD OF EDUCATION PROPOSED REGULATIONS

This letter is written to provide comment regarding Chapter 4 as published in the November 5th Pennsylvania Bulletin. The primary area of concern with these regulations is Section 4.52. Local Assessment System. This section notes that school districts may be required to use the PSSA for graduation purposes should they have a “significant” discrepancy between the numbers of students demonstrating proficiency on the PSSA and the local assessment system.

While we recognize the importance of valid, reliable assessments, substituting a single reliable assessment in place of the rich, diversity of local measures is not supported by scientifically based research nor does it honor the variety of ways learners demonstrate their knowledge and skill. Please consider the following widely accepted characteristics of quality assessment:

1. Test validity is tied to the purposes for which an assessment is used. A test may be valid, but inappropriate for a designated purpose. While the PSSA provides reliable information for the state and for district programming, various researchers/authors in assessment have clearly stated large-scale assessments provide limited information for specific students. Too few items are used on the PSSA to provide proficiency levels on individual anchor areas giving students fewer opportunities to demonstrate proficiency AND less information to use for remediation/correction.
2. Multiple and varied measures should be used to assess student learning. The PSSA is one evaluative measure and honors only particular types of learners. Local assessments, in contrast, provide multiple opportunities for mastery as well as diverse formats for demonstrating learning (multiple intelligence, performance assessments). Only when decision-makers have timely access to multiple assessments can they make informed decisions regarding student proficiency and graduation rates.
3. Timely student feedback is critical for learning. Once students take the PSSA, they do not receive results for several months and are never allowed to review the questions missed to determine why mistakes were made. This testing model severely limits students from succeeding to their highest potential on this single test.

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4. Standardized tests historically have discriminated against poor or minority children.
Given this propensity, it is likely dropout rates will increase with the most needy children if the PSSA is used for graduation.

Given the research on assessment, the Chester County administrators noted below ask the State Board of Education to revise this section of the regulations eliminating the possible use of the PSSA for graduation and encourage the Department of Education to provide training, technical assistance, and support to intermediate units and districts who are actively involved in developing valid, reliable items for local assessments.

Sincerely,

Dr. Levi Wingard, Superintendent, Downingtown Area School District
Dr. Rita Jones, Superintendent, Great Valley School District
Dr. Rudolph Karkosak, Superintendent, Kennett Consolidated School District
Dr. Tom Newcome, Superintendent, Octorara Area School District
Dr. Mary Jane Gales, Superintendent, Oxford Area School District
Dr. Myra Forrest, Superintendent, Owen J Roberts School District
Dr. Dave Noyes, Superintendent, Phoenixville Area School District
Dr. Alan Elko, Superintendent, West Chester Area School District
Dr. John Baillie, Executive Director, Chester County Intermediate Unit
Dr. Melody Wilt, Director of Curriculum, Chester County Intermediate Unit
Dr. Grace Cisek, Director of Mathematics and Science, Chester County Intermediate Unit
Dr. Linda Antonowich, Assistant Superintendent, West Chester Area School District
Dr. Midge Barilla, Assistant Superintendent, Owen J Roberts School District
Dr. Robert Lewis, Director of Secondary Education, Octorara Area School District
Dr. Helen Larson, Assistant Superintendent, Phoenixville Area School District
Dr. Alan Slobojan, Director of Career and Technical Education, Chester County Intermediate Unit
Dr. Olivia Spencer, Assistant Superintendent, Avon Grove School District
Dr. Linda MacNeal, Director of Elementary Education, Downingtown Area School District
Dr. Sandy Griffin, Assistant Superintendent, Downingtown Area School District
Dr. Jim Price, Director of Secondary Education, Unionville-Chadds Ford School District