FINAL FORM REGULATION

STATE BOARD OF EDUCATION #6-312 (IRRC #2696) ACADEMIC STANDARDS & ASSESSMENT

THIS DOCUMENT CONTAINS A CORRECTED PAGE 23 OF THE COMMENT AND RESPONSE DOCUMENT. NO CHANGES HAVE BEEN MADE TO ANY OTHER PORTION OF THE FINAL REGULATION PACKAGE.



Commonwealth of Pennsylvania STATE BOARD OF EDUCATION

October 1, 2009

Mr. Kim Kaufman Chairman Independent Regulatory Review Commission 14th Floor, 333 Market Street Harrisburg, PA 17126

Dear Mr. Kaufman:

Enclosed is a copy of page 23 from the document entitled *Response to Comments*. This is a part of the regulatory package for final form State Board of Education regulation 22 Pa. Code, Chapter 4 Academic Standards and Assessment (#006-312) that was delivered on September 21, 2009. This page includes the complete sentence that was inadvertently deleted at the bottom of the page.

The State Board of Education will provide the Commission with any assistance it requires to facilitate a thorough review of this final-form regulation.

Thank you for your consideration.

Sincerely,

Joe Torsella Chairman

Enclosure

cc:

Sen. Piccola

Sen. Dinniman

Rep. Roebuck

Rep. Clymer

Secretary Zahorchak

Gregory Dunlap, Esq.

Teresa Colarusso

First Floor, 333 Market Street, Harrisburg, PA 17126-0333 Telephone (717) 787-3787 • TDD (717) 783-8445 • Fax (717) 787-7306 website www.pde.state.pa.us_stateboard_ed • email 00statbd@psupen.psu.edu

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<u> SECTION</u>	E PROFILE & 2
(1) Agency: State Board of Educ	
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(2) Agency Number: 006	
Identification Number: 312	IRRC Number: 2696
(3) Short Title: Academic Stand	
Primary Contact: Joseph Torsella	whone Number, Address, Fax Number and Email Address): a, (717) 787-3787; State Board of Education, 333 Market Street, Harrisburg, ; Email: 00statebd@psupen.psu.edu
Primary Contact: Joseph Torsella PA 17126; Fax: (717) 787-7306; Secondary Contact: Debby Wyn	a, (717) 787-3787; State Board of Education, 333 Market Street, Harrisburg, ; Email: 00statebd@psupen.psu.edu un, (717) 787-3787, State Board of Education, 333 Market Street, Harrisburg,
Primary Contact: Joseph Torsella PA 17126; Fax: (717) 787-7306; Secondary Contact: Debby Wyn PA 17126; Fax: (717) 787-7306; (6) Primary Contact for Public C	a, (717) 787-3787; State Board of Education, 333 Market Street, Harrisburg, Email: 00statebd@psupen.psu.edu un, (717) 787-3787, State Board of Education, 333 Market Street, Harrisburg, Email: dewynn@state.pa.us Comments (List Telephone Number, Address, Fax Number and Email
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Primary Contact: Joseph Torsella PA 17126; Fax: (717) 787-7306; Secondary Contact: Debby Wyn PA 17126; Fax: (717) 787-7306;	a, (717) 787-3787; State Board of Education, 333 Market Street, Harrisburg, ; Email: 00statebd@psupen.psu.edu an, (717) 787-3787, State Board of Education, 333 Market Street, Harrisburg, ; Email: dewynn@state.pa.us Comments (List Telephone Number, Address, Fax Number and Emailtom #5: RRC'S website)
Primary Contact: Joseph Torsella PA 17126; Fax: (717) 787-7306; Secondary Contact: Debby Wyn PA 17126; Fax: (717) 787-7306; (6) Primary Contact for Public C Address) – Complete if different N.A. (All Comments will appear on II (7) Type of Rulemaking (check appears of Regulation)	a, (717) 787-3787; State Board of Education, 333 Market Street, Harrisburg, ; Email: 00statebd@psupen.psu.edu an, (717) 787-3787, State Board of Education, 333 Market Street, Harrisburg, ; Email: dewynn@state.pa.us Comments (List Telephone Number, Address, Fax Number and Emailtom #5: RRC'S website)
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(8) Briefly explain the regulation in clear and nontechnical language. (100 words or less)
The regulation strengthens state high school graduation requirements by requiring high schools to ensure that students awarded diplomas are proficient in the four core subjects of English, math, science and social studies. To do this, schools have several options, including rigorous, validated local assessments; successful course completion in which one-third of the grade is based upon the results of a state Keystone exam; or passing Advanced Placement or International Baccalaureate exams. The department will provide schools with voluntary model curriculum, diagnostic assessments and professional development and technical guidance in test development and design of supplemental instructional programs.
(9) Include a schedule for review of the regulation including:
A. The date by which the agency must receive public comments: N.A.
B. The date or dates on which public meetings or hearings will be held: N.A.
C. The expected date of promulgation of the proposed regulation as a final-form regulation:
D. The expected effective date of the final-form regulation: 11/14/2009
E. The date by which compliance with the final-form regulation will be required: Phased-in over several years; full compliance required with graduating class of 2016-17
F. The date by which required permits, licenses or other approvals must be obtained: <u>Graduating class of 2016-17</u>
(10) Provide the schedule for continual review of the regulation.
It is the policy and practice of the board to review its regulations every four years.

SECTION II: STATEMENT OF NEED

(11) State the statutory authority for the regulation. Include specific statutory citation.

Sections 2603-B and 2604-B of the Public School Code of 1949 (24 P.S. §§ 26-2603 and 2604).

(12) Is the regulation mandated by any federal or state law or court order, or federal regulation? Are there any relevant state or federal court decisions? If yes, cite the specific law, case or regulation as well as, any deadlines for action.

The federal No Child Left Behind Act of 2001, Section 1111(b)(3)(A), requires administration of state assessments aligned with state academic standards in language arts and math administered in grades 3 through 8 and at the high school level and in science at the elementary, middle and high school levels.

(13) State why the regulation is needed. Explain the compelling public interest that justifies the regulation. Describe who will benefit from the regulation. Quantify the benefits as completely as possible and approximate the number of people who will benefit.

More than 40% of those who graduate from high school—more than 50,000 students each year—are awarded diplomas without having passed the state's reading, writing and math tests. Fewer than half of our high school graduates enroll in college upon graduation, only 37% persist to their sophomore year, and just one-third graduate from college on time. An independent study conducted by Penn State University's College of Education found that only 18 of Pennsylvania's 500 school districts could demonstrate that their high school graduation requirements ensured that all students could perform in reading and math at the 11th grade level

These results severely limit wages and economic opportunity for thousands of graduates and erode the Commonwealth's overall competitiveness for attracting. The data are particularly concerning since today's graduates face a challenging economy and international competition for good jobs.

A coordinated high school reform agenda—including more rigorous academic standards, stronger graduation requirements, and additional support for struggling students—will yield significant benefits for the commonwealth. High-skill graduates will:

- Ensure an agile and productive workforce the cornerstone of a strong business climate which will in turn spur innovation and additional job creation;
- Make steady progress towards postsecondary credentials reducing the need for costly remedial instruction at our public colleges and universities;
- Earn and keep good jobs, thereby ensuring an adequate tax base to support vital government services;
- Contribute to their communities, as citizens and as leaders.

This regulation will have a positive, near-term impact for hundreds of thousands of Pennsylvania public school students, while providing important secondary benefits for the entire commonwealth.

(14) If scientific data, studies, references are used to justify this regulation, please submit material with the regulatory package. Please provide full citation and/or links to internet source.

In both 2007 and 2008, more than 40 percent of high school graduates had not demonstrated proficiency in reading, writing and math on the state system of assessment (PSSA). File attached.

Students who do not demonstrate proficiency on the state assessment can meet current graduation requirements based on a local assessment developed in accordance with 4.24 (a). A February 2009 report by a research team at the Penn State College of Education found "considerable variance in the type and form of these local assessments as well as the manner in which these assessments are used as graduation requirements." Based on criteria established and ratings by Pennsylvania educators, "evidence of alignment to standards and practices that could result in valid measures of proficiency was present from 5 percent of those school districts that submitted local assessments." Report attached.

A February 2009 survey of Pennsylvania's 14 community colleges and 14 state system universities found that 62,000 students at the schools are enrolled in remedial coursework, the cost of which exceeds \$26 million annually. File attached.

(15) Describe who and how many will be adversely affected by the regulation. How are they affected?

This regulation includes provisions – suggested by education stakeholders – designed to meet the specific needs of students who have traditionally left school without the skills to succeed in college or the workforce. The regulation will improve the consistency of graduation requirements statewide and provide clear expectations for student achievement. In addition, the new requirements will be coupled with supports including a voluntary model curriculum and instructional (classroom) diagnostic tools. Under 4.24 (b)(1)(iv)(a), a graduation decision will be based on multiple measures and students will be able to retake an assessment or complete a project-based alternative to meet requirements; no student will be denied a high school diploma based on test scores alone. Finally, any student who does not demonstrate proficiency shall be offered supplemental instructional support.

(16) List the persons, groups or entities that will be required to comply with the regulation. Approximate the number of people who will be required to comply.

Public schools, school boards, school professionals, students, and Pennsylvania Department of Education staff will be required to comply.

SECTION III: COST AND IMPACT ANALYSIS

(17) Provide a specific estimate of the costs and/or savings to the **regulated community** associated with compliance, including any legal, accounting or consulting procedures which may be required. Explain how the dollar estimates were derived.

All resources associated with the regulation will be provided by the state or developed by the school district; there is no cost impact on individuals.

(18) Provide a specific estimate of the costs and/or savings to **local governments** (school districts) associated with compliance, including any legal, accounting or consulting procedures which may be required. Explain how the dollar estimates were derived.

COSTS:

Testimony and discussions during the development of these regulations have suggested that districts and schools will require additional resources to adjust to the new requirement and provide supplemental instructional support. Schools have in place strategic planning processes, professional development systems, curriculum review and development processes, assessment systems and processes to monitor instruction and student progress. These components provide school districts and AVTSs with the foundation to gradually integrate and implement Chapter 4 requirements over the next several years. Additional supports that will offset local costs include:

- Keystone exams, voluntary model curriculum and instructional diagnostic tools will be made available to districts at no cost. Costs associated with administration of Keystone exams should be minimal as Keystones can replace existing end-of-course finals. In addition, local administrative costs will be offset by the elimination of the 11th grade PSSA and 12th grade retest in reading, writing, math and biology. The contract covering development of the Keystone exams, model curriculum and instructional diagnostics also provides for a data maintenance system that will allow administrators and teachers to chart student progress.
- Districts already have considerable state resources to support this work, including Basic education funding (2008-09 enacted: \$5.23 billion), Accountability Block Grant (08-09 enacted: \$271.4 million) and Education Assistance Program funding (08-09 enacted: \$65.1 million). In 2008, the legislature also enacted a school funding formula, setting a goal in law to meet the state's responsibility for helping all school districts achieve a resource level based on what is needed for student success. These resources could offset supplemental instruction (estimated average perstudent cost: \$600) and also fund district- and building-level management of the project-based assessment established under 4.51(n)(1). Districts will have considerable flexibility in these components of the regulation.

Technical assistance in the implementation of academic standards will be provided by the
department and intermediate units. In addition, the voluntary model curriculum and instructional
diagnostics are intended to offset these costs.

Districts that elect to use a locally-developed graduation requirements system will be required to have the system independently validated every six years against criteria that will be set by the Local Assessment Validation Advisory Committee. The costs for validation will be split evenly between the district and the state. Based on initial estimates from the Center for Assessment (Dover, NH), local assessment reviews are expected to cost between \$2,500 and \$7,500 per district assessment system, depending on the format and quantity of materials submitted (district costs would range from \$1,250 to \$3,750). It is estimated that review of a district's local assessment system by a regional panel would take approximately one day to complete. Cost assumptions are based on 200 local assessment systems in 2009-10, with an average validation cost of \$5,000 per district (\$2,500 district share). The department has estimated for 100 local assessment validations in each subsequent year, owing both to the regular approval cycle and the need for approval of material changes to local assessment systems. The department expects the number of districts utilizing local assessments will decline as new resources become available.

SAVINGS:

By utilizing the Keystone exams, model curriculum and instructional diagnostics, districts may be able to reduce ongoing efforts and expenditures relating to test development and scoring, curriculum development, and out-of-school remediation for struggling students. It is difficult to estimate these savings precisely: districts may utilize these resources in a variety of combinations, and savings will vary significantly based on a district's existing framework of curriculum, instruction and assessment. What can be estimated is savings that will result from a series of state-developed end-of-course finals.

Penn State's study of local assessments found that fewer than 5% of districts have developed systems that can yield "valid measures of proficiency" and nearly half of districts received the lowest possible score for practices related to administration and use of local assessments are administered and the use of local assessment scores for graduation requirements. Absent this regulation, districts would be expected to strengthen or develop local assessments to ensure valid measures of proficiency for purposes of graduation.

Based on estimates from the Center for Assessment, these test development costs could easily exceed \$25,000 per assessment. Refining this estimate depends on a number of variables, including the size of the district, assessment format (e.g., a test comprised solely of constructed response items is less expensive), faculty and staff experience with educational measurement, and availability of tools such as electronic scoring devices. Districts will face both near-term start-up costs (e.g., developing a sufficient item bank for each assessment) and ongoing costs associated with printing, scoring and reporting.

By assuming all costs associated with Keystone exam development, scoring and reporting, the state will ensure statewide district-level cost savings of at least several million dollars annually.

(19) Provide a specific estimate of the costs and/or savings to **state government** associated with the implementation of the regulation, including any legal, accounting, or consulting procedures which may be required. Explain how the dollar estimates were derived.

COSTS:

The majority of anticipated costs to the state are identified in the contract that will guide development of ten Keystone exams (algebra I and II, geometry, biology, chemistry, literature, U.S. history, world history, civics and government); model curriculum; and instructional diagnostics. Costs through fiscal year 2014: \$145,000,000; total contract costs: \$176,375,112.

The state will fund development and regional scoring of project-based assessments, an alternative path to graduation based on the Maryland Bridge Plan for Academic Validation. Maryland uses grant funding – approximately \$50,000 annually – to convene educator panels to develop the projects. The department is estimating costs of approximately \$200,000 annually for project development and scoring, beginning 2010-11.

The state is responsible for organizing three committees: the state assessment validation advisory committee, the local assessment validation advisory committee, and an advisory committee for the development of performance-level descriptors and cut scores. Estimated costs for administration, travel reimbursement, and release time for members (e.g., reimbursing districts for the cost of substitutes): \$30,000 annually.

The department will conduct a series of validity studies on the algebra I, literature, and biology Keystone exams which together will serve as the state's high school level accountability system for purposes of NCLB. Estimated total cost: \$150,000 (costs in FYs 2010-11, 11-12, and 12-13).

In addition, once all Keystone exams have been developed, the department will contract with a qualified vendor to perform a validity study of the Keystone exams every five years. Estimate: \$250,000, costs incurred no earlier than FY 2016-17. (The cost of the state board's 2005 PSSA validity study by the Human Resources Research Organization (HumRRO) was approximately \$175,000; however, this study did not include convergent validity, which will be a component of the Keystone validity study.)

The state will share costs associated with the validation of local assessments. As discussed above, the department estimates local validation costs to range from \$2,500 and \$7,500 per district, for an average state share of \$2,500 per district.

SAVINGS:

The department will seek approval from the U.S. Department of Education to replace the 11th grade PSSA and 12th grade retest with three Keystone exams for use as the state's single accountability system under NCLB. As a result, the department will save approximately \$5 million annually, beginning 2012-13, through reductions to an existing contract with Data Recognition Corporation.

(20) In the table below, provide an estimate of the fiscal savings and costs associated with implementation and compliance for the regulated community, local government, and state government for the current year and five subsequent years. NOTE: As of the date of submission of this document, there is no 2009-10 education budget; FY 2008-09 is shown as the current fiscal year. Local and state government savings will continue beyond 2014; local and state costs will also continue beyond 2014.

	Current FY	FY +1	FY +2	FY +3	FY +4	FY +5
	Year: 08-09	09-10	10-11	11-12	12-13	13-14
SAVINGS:	\$	\$	\$	\$	\$ -	\$
Regulated Community	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
Local Government	0	5,000,000	6,000,000	7,000,000	8,000,000	9,000,000
State Government	0	0	0	0	5,000,000	5,000,000
Total Savings	0	5,000,000	6,000,000	7,000,000	13,000,000	14,000,000
COSTS:						
Regulated Community	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
Local Government Local validation:	0	500,000	250,000	250,000	250,000	250,000
State Government	7,976,261	21,425,468	25,679,719	29,578,716	30,500,924	31,374,475
Total Costs	7,976,261	21,925,468	25,929,719	29,828,716	30,750,924	31,624,475
REVENUE LOSSES:	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
Regulated Community	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
Local Government	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
State Government	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
Total Revenue Losses	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.

(20a) Provide the past three year expenditure history for programs affected by the regulation. NOTE: As of the date of submission of this document, there is no 2009-10 education budget; FY 2008-09 is shown as the current fiscal year.

Program	FY -3 (05-06)	FY -2 (06-07)	FY -1 (07-08)	Current FY (08-09)
Basic Education Subsidy	4,492,184,000	4,784,264,000	4,951,429,000	5,226,142,000
Pennsylvania Assessment	20,356,000	20,094,000	31,619,000	54,400,000
Accountability Block Grant	200,000,000	250,000,000	275,000,000	271,425,000
Education Assistance Program	66,000,000	66,000,000	65,683,000	65,142,000
Teacher Prof Dev.	13,867,000	23,367,000	30,367,000	42,556,000

(21) Explain how the benefits of the regulation outweigh any cost and adverse effects.

The regulation will address several importance education policy objectives, including more consistency in academic expectations statewide, stronger high school graduation requirements, and reduced testing time for students by replacing the high school-level PSSA with Keystone exams. The total cost of the proposal represents less than 1 percent of current state-level spending on basic education. For both districts and students, the regulation provides enormous flexibility: districts will have choice in selecting and implementing graduation requirements, and the proposal responds to calls for protections and alternative pathways to ensure that no student will be denied a high school based on a test score alone.

(22) Describe the communications with and input from the public and any advisory council/group in the development and drafting of the regulation. List the specific persons and/or groups who were involved.

Since publication of the proposed regulation in the May 17, 2008 edition of the Pennsylvania Bulletin, the board has conducted extensive public outreach activities:

- In addition to regular board meetings, which include opportunities for public comment, the board held six regional public hearings, at which 72 individuals representing diverse communities and constituencies presented testimony.
- Board leadership met one or more times with the majority and minority leadership of the General Assembly; chairs of the House and Senate Education Committees; individual members of the House Education Committee and other members of the General Assembly; Coalition for Effective and Responsible Testing (CERT); leadership of the Pennsylvania School Boards Association, Pennsylvania Association of School Administrators, Pennsylvania State Education Association, Pennsylvania Association of Elementary and Secondary School Principals, NAACP, Pennsylvania Partnerships for Children and scores of individuals.
- Board and department leadership presented testimony at several public hearings held by the House and Senate Education Committees.

The comments, testimony, research and recommendations offered by members of the public contributed towards the development and drafting of the final regulation.

(23) Include a description of any alternative regulatory provisions which have been considered and rejected and a statement that the least burdensome acceptable alternative has been selected.

The state board published proposed regulations in November 2005 that were designed to address the quality of local assessments in school districts that have a significant discrepancy between the number of students who demonstrate proficiency on the 11th grade PSSA and the number of students awarded high school diplomas. After receiving considerable public comment in opposition to this proposal, the board chose not to promulgate the regulation. Subsequently, Governor Rendell established the Governor's Commission on College and Career Success to study the need for high school reforms, including stronger graduation requirements. This regulation, while modified considerably from the recommendations of the Commission, is based upon its recommendation.

Since state high school graduation requirements can only be established by statute or regulation, the final regulation is the least burdensome acceptable alternative.

- (24) Are there any provisions that are more stringent than federal standards? If yes, identify the specific provisions and the compelling Pennsylvania interest that demands stronger regulations.
- N.A. there are no federal requirements for high school graduation.
- (25) How does this regulation compare with those of other states? How will this affect Pennsylvania's ability to compete with other states?

As of the 2008-09 school year, 24 states – including Maryland, New Jersey, New York and Ohio – "require students to pass exams to receive a high school diploma" (Center for Education Policy, 2008). According to CEP, approximately 70% of public high school students nationwide – including 75% of minority students – are enrolled in states with exit exams. The regulation will allow Pennsylvania to keep pace with rising academic expectations nationally, while still providing districts and students with enormous flexibility in implementing and meeting requirements.

(26) Will the regulation affect any other regulations of the promulgating agency or other state agencies? If yes, explain and provide specific citations.

Chapter 403, Compliance With the Federal No Child Left Behind Act of 2001, will require revision should the U.S. Department of Education approve use of the literature, Algebra I and Biology Keystone exams as Pennsylvania's high school level assessment instrument.

(27) Submit a statement of legal, accounting or consulting procedures and additional reporting, recordkeeping or other paperwork, including copies of forms or reports, which will be required for implementation of the regulation and an explanation of measures which have been taken to minimize these requirements.

Districts will be required to maintain student-level records of progress toward graduation requirements. The department will provide a data-tracking tool to assist districts and schools in meeting this obligation.

(28) Please list any special provisions which have been developed to meet the particular needs of affected groups or persons including, but not limited to, minorities, elderly, small businesses, and farmers.

Provisions are included to address the needs of students with disabilities, gifted students, and English language learners. In addition, the regulation includes a provision that allows the Secretary of Education to waive certain graduation requirements for students who experience extenuating circumstances (e.g., serious illness, death in the immediate family, family emergency, and frequent transfers among schools or transfer from an out-of-state school in 12th grade).

2006-07 Proficiency Rates on 11th Grade PSSA vs. 2007-08 Graduation Rates

File prepared by PA Partnerships for Children, 2009

ď				postsecond	grads not proficient	pssa math
County	AUN	DistrictName	graduates	ary bound	and readin	g.
State Tota	l _.		130296	97711	52219	40.1%
Adams	112011103	BERMUDIAN SPRINGS SD	154	101	38	24.7%
Adams	112011603	CONEWAGO VALLEY SD	297	209	114	38.3%
Adams	112013054	FAIRFIELD AREA SD	96	65	52	54.2%
Adams	112013753	GETTYSBURG AREA SD	285	203	105	36.9%
Adams	112015203	LITTLESTOWN AREA SD	120	88	45	37.5%
Adams	112018523	UPPER ADAMS SD	142	97	71	49.9%
Allegheny		ACADEMY CHARTER SCHOOL	33	6	31	93.9%
Allegheny		ALLEGHENY VALLEY SD	98	89	35	35.7%
Allegheny		AVONWORTH SD	91	79	25	27.5%
Allegheny		BALDWIN-WHITEHALL SD	400	347	102	25.5%
Allegheny		BETHEL PARK SD	460		119	25.9%
Allegheny		BRENTWOOD BOROUGH SD	103		20	19.4%
Allegheny		CAREER CONNECTIONS CHS	62		41	66.1%
Allegheny		CARLYNTON SD	103		37	35.9%
Allegheny		CHARTIERS VALLEY SD	293			27.2%
Allegheny	102020001		94		21	22.3%
		CLAIRTON CITY SD	56	49	39	69.7%
Allegheny		CORNELL SD	60		34	56.7%
Allegheny		DEER LAKES SD	159		38	23.9%
Allegheny			0		30	23.9%
Allegheny		DUQUESNE CITY SD			64	40.00/
Allegheny		EAST ALLEGHENY SD	. 124		61	49.2%
Allegheny		ELIZABETH FORWARD SD	195		81	41.6%
Allegheny		FOX CHAPEL AREA SD	371	340		12.3%
Allegheny		GATEWAY SD	339			28.5%
Allegheny		HAMPTON TOWNSHIP SD	253			12.3%
Allegheny		HIGHLANDS SD	203			49.2%
Allegheny		KEYSTONE OAKS SD	201	172	68	33.8%
Allegheny		MCKEESPORT AREA SD	323		255	78.9%
Allegheny		MONTOUR SD	272		85	31.2%
Allegheny		MOON AREA SD	272			5.5%
Allegheny		MT LEBANON SD	490			18.5%
Allegheny		NORTH ALLEGHENY SD	645			19.2%
Allegheny		NORTH HILLS SD	435			23.9%
Allegheny		NORTHGATE SD	108			45.4%
Allegheny		NORTHSIDE URBAN PATHWAYS	31			77.5%
Allegheny	103020001	PA LEARNERS ONLINE CS	97			91.8%
Allegheny	103027352	PENN HILLS SD	408	252	216	53.0%
Allegheny	103021003	PINE-RICHLAND SD	332	307	68	20.4%
Allegheny	102027451	PITTSBURGH SD	1814	1474	800	44.1%
Allegheny	103027503	PLUM BOROUGH SD	373	329	106	28.4%
Allegheny	103027753	QUAKER VALLEY SD	148	135	29	19.6%
Allegheny	103028203	RIVERVIEW SD	101	88	44	43.6%
Allegheny	103028302	SHALER AREA SD	435	211	186	42.7%
Allegheny	103028653	SOUTH ALLEGHENY SD	133	112	73	54.9%
Allegheny	103028703	SOUTH FAYETTE TOWNSHIP SD	127	120	20	15.8%
Allegheny		SOUTH PARK SD	188	170	47	25.0%
Allegheny		SPECTRUM CS	2	. 1	. 2	100.0%
Allegheny		STEEL VALLEY SD	147			45.6%
Allegheny		STO-ROX SD	96			56.3%
Allegheny		UPPER SAINT CLAIR SD	340			7.9%
Allegheny		WEST ALLEGHENY SD	243			18.8%
Allegheny		WEST JEFFERSON HILLS SD	258			15.5%
Allegheny		WEST MIFFLIN AREA SD	259			45.1%
Allegheny		WILKINSBURG BOROUGH SD	85			72.8%
Allegheny		WOODLAND HILLS SD	316			52.8%
		APOLLO-RIDGE SD	91			43.9%
Armstrong		ARMSTRONG SD	351			52.1%
Armstrong	?	FREEPORT AREA SD	134			35.8%
Armstrong			42			26.2%
Armstrong		LEECHBURG AREA SD	199		•	71.4%
Armstrong	120034007	LENAPE AVTS	193	, 90	174	1,1.770

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	Beaver	127040503 ALIQUIPPA SD	89	61	62	69.7%	
•	Beaver	127040703 AMBRIDGE AREA SD	190	152	57	29.9%	
	Beaver	127040001 BEAVER AREA ACADEMIC CS	9	0	8	88.9%	
	Beaver	127041203 BEAVER AREA SD	165	134	43	26.1%	
	Beaver	127041503 BIG BEAVER FALLS AREA SD	147	114	70	47.6%	
	Beaver Beaver	127041603 BLACKHAWK SD 127041903 CENTER AREA SD	223 142	176	77 20	34.5%	
	Beaver	127041903 CENTER AREA SD 127042853 FREEDOM AREA SD	131	114 107	29 38	20.4% 29.0%	
	Beaver	127044103 HOPEWELL AREA SD	227	164	82	36.1%	
	Beaver	127040002 LINCOLN PARK PERFORMING AF	60	56	32	53.4%	
	Beaver	127045453 MONACA SD	57	45	29	50.8%	
	Beaver	127045653 NEW BRIGHTON AREA SD	122	101	33	27.0%	
	Beaver	127043430 PA CYBER CS	809	536	479	59.2%	
•	Beaver Beaver	127045853 RIVERSIDE BEAVER COUNTY SD 127046903 ROCHESTER AREA SD	165 55	123 44	75 15	45.4%	
	Beaver	127047404 SOUTH SIDE AREA SD	109	85	41	27.2% 37.6%	
	Beaver	127049303 WESTERN BEAVER COUNTY SD	63	48	31	49.3%	
	Bedford	108051003 BEDFORD AREA SD	158	91	58	36.7%	
	Bedford	108051503 CHESTNUT RIDGE SD	155	104	60	38.8%	
	Bedford	108053003 EVERETT AREA SD	125	79	53	42.4%	
	Bedford Bedford	108056004 NORTHERN BEDFORD COUNTY (108058003 TUSSEY MOUNTAIN SD	90	63	31	34.5%	
	Berks	114060503 ANTIETAM SD	99 98	58 76	55 46	55.6%	
	Berks	114060753 BOYERTOWN AREA SD	556	412	188	46.9% 33.8%	
	Berks	114060853 BRANDYWINE HEIGHTS AREA SI	140	110	46	32.8%	•
	Berks	114061103 CONRAD WEISER AREA SD	242	195	79	32.7%	
	Berks	114061503 DANIEL BOONE AREA SD	249	174	126	50.7%	
	Berks	114062003 EXETER TOWNSHIP SD	317	0	108	34.1%	
	Berks	114062503 FLEETWOOD AREA SD	218	153	107	49.0%	
	Berks Berks	114063003 GOVERNOR MIFFLIN SD 114063503 HAMBURG AREA SD	311 195	261 138	172	55.2%	
	Berks	114064003 KUTZTOWN AREA SD	143	100	114 49	58.4% 34.2%	
	Berks	114065503 MUHLENBERG SD	262	219	111	42.4%	
	Berks	114066503 OLEY VALLEY SD	145	113	30	20.7%	
	Berks	114067002 READING SD	. 716	438	557	77.9%	
	Berks	114067503 SCHUYLKILL VALLEY SD	161	136	27	16.8%	
	Berks	114068003 TULPEHOCKEN AREA SD	116	79	30	25.9%	
	Berks Berks	114068103 TWIN VALLEY SD 114069103 WILSON SD	235 441	190 378	30	12.8%	
	Berks	114069353 WYOMISSING AREA SD	148	136	90 42	20.5% 28.4%	
	Blair	108070502 ALTOONA AREA SD	517	343	131	25.3%	
	Blair	108071003 BELLWOOD-ANTIS SD	102	75	14	13.8%	
	Blair	108070001 CENTRAL PENN DIGITAL LEARNI	16	10	· 11	68.8%	
	Blair	108071504 CLAYSBURG-KIMMEL SD	62	42	43	69.4%	
	Blair	108073503 HOLLIDAYSBURG AREA SD	286	216	77 50	27.0%	
	Blair Blair	108077503 SPRING COVE SD 108078003 TYRONE AREA SD	149 139	90 <u> </u>	53 46	35.6%	
	Blair	108079004 WILLIAMSBURG COMMUNITY SD	46	25	46 29	33.1% 63.0%	•
	Bradford	117080503 ATHENS AREA SD	205	127	104	50.7%	
	Bradford	117081003 CANTON AREA SD	85	50	44	51.8%	
	Bradford	117083004 NORTHEAST BRADFORD SD	62	48	33	53.2%	
	Bradford	117086003 SAYRE AREA SD	71	53	27	38.0%	
	Bradford	117086503 TOWANDA AREA SD	145	93	65	44.8%	
	Bradford Bradford	117086653 TROY AREA SD 117089003 WYALUSING AREA SD	120 101	. 79 60	64	53.3%	
	Bradford Bucks	122091002 BENSALEM TOWNSHIP SD	101 466	69 371	44 188	43.6% 40.3%	
	Bucks	122091303 BRISTOL BOROUGH SD	99	69	60	60.6%	
	Bucks	122091352 BRISTOL TOWNSHIP SD	352	280	200	56.8%	
	Bucks	122091457 BUCKS CO TECHNICAL HS	312	199	121	38.8%	
	Bucks	122092002 CENTENNIAL SD	468	409	116	24.8%	
	Bucks	122092102 CENTRAL BUCKS SD	1540	1351	224	14.5%	
	Bucks	122092353 COUNCIL ROCK SD	1097	476	313	28.6%	
	Bucks Bucks	122090001 CTR STUDENT LEARNING CS - PI 122097203 MORRISVILLE BOROUGH SD	16 64	15 54	16 42	100.0% 65.6%	•
	- cvon	TETOSTEON MOUTHOUTHOUTHOUTHOUTHOUTHOUTHOUTHOUTHOUTH	04	. 04	42	00.0%	

Duelee	100007E00 NECHAMINIV CD	740	000	200	44.004
Bucks	122097502 NESHAMINY SD	743	639	333	44.8%
Bucks Bucks	122097604 NEW HOPE-SOLEBURY SD 122098003 PALISADES SD	115 193	106	32	27.8%
Bucks	122098103 PENNRIDGE SD	573	154 477	46 154	23.9%
Bucks	122098202 PENNSBURY SD	840	786	335	26.9% 39.9%
Bucks	122098403 QUAKERTOWN COMMUNITY SD	373	323	100	26.8%
Butler	104101252 BUTLER AREA SD	610	522	100	16.7%
Butler	104103603 KARNS CITY AREA SD	113	86	23	20.3%
Butler	104105003 MARS AREA SD	255	243	113	44.3%
Butler	104105353 MONITEAU SD	121	76	57	47.1%
Butler	104107903 SENECA VALLEY SD	542	470	122	22.6%
Butler	104107503 SLIPPERY ROCK AREA SD	166	145	53	32.0%
Butler	104107803 SOUTH BUTLER COUNTY SD	253	209	101	39.9%
Cambria	108110603 BLACKLICK VALLEY SD	46	35	13	28.2%
Cambria	108111203 CAMBRIA HEIGHTS SD	110	81	30	27.3%
Cambria	108111303 CENTRAL CAMBRIA SD	158	113	51	32.3%
Cambria	108111403 CONEMAUGH VALLEY SD	64	43	19	29.8%
Cambria	108112003 FERNDALE AREA SD	56	34	15	26.8%
Cambria	108112203 FOREST HILLS SD	230	163	90	39.2%
Cambria	108112502 GREATER JOHNSTOWN SD	212	114	93	43.9%
Cambria	108114503 NORTHERN CAMBRIA SD	98	60	34	34.7%
Cambria	108116003 PENN CAMBRIA SD	168	98	59	35.1%
Cambria	108116303 PORTAGE AREA SD	68	49	26	38.3%
Cambria	108116503 RICHLAND SD	134	0	34	25.4%
Cambria	108118503 WESTMONT HILLTOP SD	147	129	24	16.3%
Cameron	109122703 CAMERON COUNTY SD	83	54	40	48.1%
Carbon	121131507 CARBON CAREER & TECH INSTIT	64	24	41	64.1%
Carbon	121135003 JIM THORPE AREA SD	151	132	79	52.3%
Carbon	121135503 LEHIGHTON AREA SD	224	183	128	57.2%
Carbon	121136503 PALMERTON AREA SD	123	109	41	33.3%
Carbon	121136603 PANTHER VALLEY SD	138	95	101	73.2%
Carbon	121139004 WEATHERLY AREA SD	67	54	18	26.9%
Centre	110141003 BALD EAGLE AREA SD	162	99	73	45.1%
Centre	110141103 BELLEFONTE AREA SD	255	195	100	39.2%
Centre	110147003 PENNS VALLEY AREA SD 110148002 STATE COLLEGE AREA SD	123	86	27	21.9%
Centre Chester	124150002 STATE COLLEGE AREA SD	656 74	576	162	24.7%
Chester	124150002 2151 CENTORY CYBER CS	71 33	62 25	30 42	42.3%
Chester	124150503 AVON GROVE 65 124150503 AVON GROVE SD	421	345	12	36.4%
Chester	124151902 COATESVILLE AREA SD	509	418	118 293	28.0% 57.6%
Chester	124153320 COLLEGIUM CS	10	9	293	
Chester	124151607 CTR FOR ARTS AND TECHNOLOG	177	0	156	90.0% 88.1%
Chester	124152003 DOWNINGTOWN AREA SD	910	833	174	19.1%
Chester	124153503 GREAT VALLEY SD	318	294	42	13.1%
Chester	124154003 KENNETT CONSOLIDATED SD	299	238	125	41.8%
Chester	124156503 OCTORARA AREA SD	177	137	88	49.7%
Chester	124156603 OWEN J ROBERTS SD	363	324	123	33.9%
Chester	124156703 OXFORD AREA SD	287	197	135	47.1%
Chester	124150004 PENNSYLVANIA LEADERSHIP CF	238	110	208	87.4%
Chester	124157203 PHOENIXVILLE AREA SD	244	217	58	23.8%
Chester	124153350 RENAISSANCE ACAD CS	32	32	4	12.5%
Chester	124157802 TREDYFFRIN-EASTTOWN SD	491	4 79	50	10.2%
Chester	124158503 UNIONVILLE-CHADDS FORD SD	311	301	57	18.3%
Chester	124159002 WEST CHESTER AREA SD	941	863	253	26.9%
Clarion	106160303 ALLEGHENY-CLARION VALLEY S	86	48	51	59.3%
Clarion	106161203 CLARION AREA SD	72	53	27	37.4%
Clarion	106161703 CLARION-LIMESTONE AREA SD	71	49	21	29.6%
Clarion	106166503 KEYSTONE SD	114	81	48	42.2%
Clarion	106167504 NORTH CLARION COUNTY SD	57	38	22	38.6%
Clarion	106168003 REDBANK VALLEY SD	84	49	31	37.0%
Clarion	106169003 UNION SD	45	27	25	55.5%
Clearfield	110171003 CLEARFIELD AREA SD	201	125	81	40.3%
Clearfield	110171803 CURWENSVILLE AREA SD	74 201	59	31	41.8%
Clearfield	106172003 DUBOIS AREA SD	301	239	82	27.2%

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	Clearfield	110173003 GLENDALE SD	. 71	53	30	42.3%	
	Clearfield	110173504 HARMONY AREA SD	28	16	13	46.5%	
	Clearfield	110175003 MOSHANNON VALLEY SD	79	48	36	45.5%	
	Clearfield	110177003 PHILIPSBURG-OSCEOLA AREA S	129	86	46	35.6%	
	Clearfield	110179003 WEST BRANCH AREA SD	94	53	42	44.7%	
	Clinton	110183602 KEYSTONE CENTRAL SD	350	238	166	47.4%	
	Clinton	101833400 SUGAR VALLEY RURAL CS	31	13	20	64.6%	
	Columbia	116191004 BENTON AREA SD	54	37	28	51.8%	
	Columbia	116191103 BERWICK AREA SD	208	150	109	52.4%	
	Columbia	116191203 BLOOMSBURG AREA SD	99	78	25	25.3%	
	Columbia	116191503 CENTRAL COLUMBIA SD	174	122	62	35.6%	
	Columbia	116191757 COLUMBIA-MONTOUR AVTS	150	67	84	56.0%	
	Columbia	116195004 MILLVILLE AREA SD 116197503 SOUTHERN COLUMBIA AREA SD	44	32	18	40.9%	
	Columbia Crawford	105201033 CONNEAUT SD	112 217	94 133	34	30.4%	
	Crawford	105201033 CONNEAUT SD 105201352 CRAWFORD CENTRAL SD	305	205	97 101	44.7% 33.1%	
	Crawford	105204703 PENNCREST SD	283	181	101	33.1% 37.1%	
	Cumberlan	115210503 BIG SPRING SD	208	136	106	50.9%	
	Cumberlan	115211003 CAMP HILL SD	85	.74	15	17.6%	
	Cumberlan	115211103 CARLISLE AREA SD	347	244	173	49.8%	
	Cumberlan	115211603 CUMBERLAND VALLEY SD	570	449	61	10.7%	
٠,	Cumberlan	115212503 EAST PENNSBORO AREA SD	193	169	71	36.8%	
	Cumberlan	115216503 MECHANICSBURG AREA SD	247	216	66	26.7%	
	Cumberlan	115218003 SHIPPENSBURG AREA SD	236	182	113	47.9%	
	Cumberlan	115218303 SOUTH MIDDLETON SD	179	153	72	40.2%	•
	Dauphin	115221402 CENTRAL DAUPHIN SD	779	660	318	40.8%	•
	Dauphin	115221607 DAUPHIN CO AVTS	178	75	118	66.2%	
	Dauphin	115221753 DERRY TOWNSHIP SD	264	233	56	21.2%	
	Dauphin	115222504 HALIFAX AREA SD	78	56	39	50.0%	
	Dauphin	115222752 HARRISBURG CITY SD	438	282	372	84.9%	
	Dauphin	115224003 LOWER DAUPHIN SD	293	235	105	35.8%	
	Dauphin	115226003 MIDDLETOWN AREA SD	143	86	55	38.4%	
	Dauphin	115226103 MILLERSBURG AREA SD	72	64	30	41.6%	
	Dauphin Dauphin	115220003 PA DISTANCE & ELECTRONIC LE 115228003 STEELTON-HIGHSPIRE SD	56 66	50 34	29 52	51.8%	
	Dauphin	115228303 SUSQUEHANNA TOWNSHIP SD	254	231	110	78.7%	
	Dauphin	115229003 UPPER DAUPHIN AREA SD	82	59	25	43.3% 30.5%	
	Delaware	125231232 CHESTER-UPLAND SD	241	132	229	95.0%	
	Delaware	125231303 CHICHESTER SD	255	186	140	54.8%	
	Delaware	125234103 GARNET VALLEY SD	355	333	109	30.7%	
	Delaware	125234502 HAVERFORD TOWNSHIP SD	461	434	172	37.4%	
	Delaware	125235103 INTERBORO SD	350	254	183	52.4%	
	Delaware	125235502 MARPLE NEWTOWN SD	297	265	110	37.1%	
	Delaware	125236903 PENN-DELCO SD	297	252	116	39.1%	
	Delaware	125237603 RADNOR TOWNSHIP SD	271	244	44	16.3%	
	Delaware	125237702 RIDLEY SD	469	384	182	38.8%	
	Delaware	125237903 ROSE TREE MEDIA SD	288	267	67	23.2%	
	Delaware	125238402 SOUTHEAST DELCO SD	200	164	126	63.1%	
	Delaware	125238502 SPRINGFIELD SD	283	262	47	16.7%	
	Delaware	125239452 UPPER DARBY SD	783	591	398	50.8%	
	Delaware Delaware	125239603 WALLINGFORD-SWARTHMORE § 125239652 WILLIAM PENN SD	322 364	282 278	80	24.9%	
	Elk	109243503 JOHNSONBURG AREA SD	56	43	267 25	73.3%	•
	Elk	109246003 RIDGWAY AREA SD	91	74	25 36	44.6% 39.6%	
	Elk	109248003 SAINT MARYS AREA SD	190	140	59	31.0%	
	Erie	105251453 CORRY AREA SD	186	123	70	37.6%	
	Erie	105252602 ERIE CITY SD	783	573	262	33.4%	
	Erie	105253303 FAIRVIEW SD	134	114	29	21.6%	
	Erie	105253553 FORT LEBOEUF SD	196	147	48	24.5%	
	Erie	105253903 GENERAL MCLANE SD	210	170	49	23.2%	
	Erie	105254053 GIRARD SD	138	99	31	22.5%	
	Erie	105254353 HARBOR CREEK SD	154	115	48	31.1%	
	Erie	105256553 IROQUOIS SD	105	79	49	46.6%	
	Erie	105257602 MILLCREEK TOWNSHIP SD	574	484	235	41.0%	

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Erie	105258303 NORTH EAST SD	144	109	61	42.4%
Erie	105258503 NORTHWESTERN SD	160	110	76	47.5%
Erie	105250001 PERSEUS HOUSE CS OF EXCELL	45	20	41	91.1%
Erie	105259103 UNION CITY AREA SD	85	49	42	49.3%
Erie	105259703 WATTSBURG AREA SD	115			
			80	36	31.2%
Fayette	101260303 ALBERT GALLATIN AREA SD	243	148	135	55.5%
Fayette	101260803 BROWNSVILLE AREA SD	106	56	60	56.7%
Fayette	101266007 Connellsville Area Career & Te	83	26	83	100.0%
Fayette	101261302 CONNELLSVILLE AREA SD	238	183	47	19.7%
Fayette	101262903 FRAZIER SD	81	54	21	
					25.9%
Fayette	101264003 LAUREL HIGHLANDS SD	240	205	105	43.8%
Fayette	101268003 UNIONTOWN AREA SD	221	165	80	36.1%
Forest	106272003 FOREST AREA SD	68	4 8	38	55.9%
Franklin	112281302 CHAMBERSBURG AREA SD	601	337	216	35.9%
Franklin	112282004 FANNETT-METAL SD	45	18	26	57.8%
Franklin	112283003 GREENCASTLE-ANTRIM SD	204	144	63	
					31.0%
Franklin	112288008 SCOTLAND SCH VET. CHILDREN	25	22	6	24.0%
Franklin	112286003 TUSCARORA SD	207	118	96	46.4%
Franklin	112289003 WAYNESBORO AREA SD	312	209	. 143	45.9%
Fulton	111291304 CENTRAL FULTON SD	65	42	. 29	44.6%
Fulton	111292304 FORBES ROAD SD	33	19	17	51.5%
Fulton	111297504 SOUTHERN FULTON SD	63			
_			45	16	25.4%
Greene	101301303 CARMICHAELS AREA SD	74	45	29	39.2%
Greene	101301403 CENTRAL GREENE SD	156	97	73	46.7%
Greene	101303503 JEFFERSON-MORGAN SD	68	48	38	55.8%
Greene	101306503 SOUTHEASTERN GREENE SD	40	23	26	65.1%
Greene	101308503 WEST GREENE SD	77	47	26	33.7%
Huntingdor	111312503 HUNTINGDON AREA SD	179			
			118	57	31.9%
Huntingdor	111312804 JUNIATA VALLEY SD	64	36	22	34.4%
Huntingdor	111316003 MOUNT UNION AREA SD	108	64	53	49.0%
Huntingdor	111317503 SOUTHERN HUNTINGDON COUN	109	61	76	69.7%
Indiana	128321103 BLAIRSVILLE-SALTSBURG SD	177	137	46	26.0%
Indiana	128323303 HOMER-CENTER SD	93	72	28	30.1%
Indiana	128323703 INDIANA AREA SD				
		290	232	77	26.6%
Indiana	128325203 MARION CENTER AREA SD	116	89	45	38.8%
Indiana	128326303 PENNS MANOR AREA SD	69	55	26	37.6%
Indiana	128327303 PURCHASE LINE SD	78	44	27	34.6%
Indiana	128328003 UNITED SD	110	77	51	46.4%
Jefferson	106330703 BROCKWAY AREA SD	67	54	17	
					25.4%
Jefferson	106330803 BROOKVILLE AREA SD	140	96	58	41.4%
Jefferson	106333407 JEFFERSON CO-DUBOIS AVTS	79	8	45	56.9%
Jefferson	106338003 PUNXSUTAWNEY AREA SD	229	162	70	30.6%
Juniata	111343603 JUNIATA COUNTY SD	232	151	137	59.1%
Lackawanr	119350303 ABINGTON HEIGHTS SD	315	276	109	34.6%
Lackawanr	119351303 CARBONDALE AREA SD	101	65	36	
					35.6%
Lackawanr	119352203 DUNMORE SD	148	135	34	23.0%
Lackawanr	119354603 LAKELAND SD	114	88	63	55.2%
Lackawanr	119355503 MID VALLEY SD	. 118	0	52 -	44.1%
Lackawanr	119356503 NORTH POCONO SD	230	185	89	38.7%
Lackawanr	119356603 OLD FORGE SD	70	63	18	25.7%
Lackawanr	119357003 RIVERSIDE SD	119	95		
				42	35.3%
Lackawanr	119357402 SCRANTON SD	758	723	297	39.2%
Lackawanr	119358403 VALLEY VIEW SD	186	155	86	46.3%
Lancaster	113361303 COCALICO SD	263	177	88	33.5%
Lancaster	113361503 COLUMBIA BOROUGH SD	110	71	50	45.4%
Lancaster	113361703 CONESTOGA VALLEY SD	249	192	59	23.7%
Lancaster	113362203 DONEGAL SD	208	128		
				84	40.4%
Lancaster	113362303 EASTERN LANCASTER CO SD	309	188	89	28.8%
Lancaster	113362403 ELIZABETHTOWN AREA SD	281	203	80	28.5%
Lancaster	113362603 EPHRATA AREA SD	363	234	130	35.8%
Lancaster	113363103 HEMPFIELD SD	522	412	98	18.7%
Lancaster	113362940 LA ACADEMIA CS	10	2	8	80.0%
Lancaster	113363603 LAMPETER-STRASBURG SD	254			
			192	4 5	17.7%
Lancaster	113363705 Lancaster County Academy	38	12	38	100.0%
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	113364002 LANCASTER SD	500	200	222	0 T 00/
Lancaster		590	389	389	65.9%
Lancaster	113364403 MANHEIM CENTRAL SD	179	96	0	0.0%
Lancaster	113364503 MANHEIM TOWNSHIP SD	413	360	68	16.4%
Lancaster	113365203 PENN MANOR SD	444	316	144	32.4%
Lancaster	113365303 PEQUEA VALLEY SD	143	92	53	37.1%
Lancaster	113367003 SOLANCO SD	304	176	127	41.7%
Lancaster	113369003 WARWICK SD	343	263	105	30.7%
Lawrence	104372003 ELLWOOD CITY AREA SD	130	95	53	40.7%
Lawrence	104374003 LAUREL SD	90	69	43	47.7%
Lawrence	104374207 LAWRENCE CO AVTS	87	51	76	87.4%
Lawrence	104375003 MOHAWK AREA SD	163	129	71	43.5%
Lawrence	104375203 NESHANNOCK TOWNSHIP SD	90	86	22	24.4%
Lawrence	104375302 NEW CASTLE AREA SD	200	156	80	39.9%
Lawrence	104376203 SHENANGO AREA SD	122	92	33	27.1%
Lawrence	104377003 UNION AREA SD	54	49	31	57.4%
Lawrence	104378003 WILMINGTON AREA SD	131	113	36	27.5%
Lebanon	113380303 ANNVILLE-CLEONA SD	108	82	21	19.4%
Lebanon	113381303 CORNWALL-LEBANON SD	428	317	88	20.6%
Lebanon	113382303 EASTERN LEBANON CO SD	180	118	76	42.2%
Lebanon	113384603 LEBANON SD	191	138	109	57.1%
Lebanon	113385003 NORTHERN LEBANON SD	212	80	127	59.9%
Lebanon	113385303 PALMYRA AREA SD	249	169	89	35.8%
Lehigh	121390302 ALLENTOWN CITY SD	1080	673	762	70.6%
Lehigh	121391303 CATASAUQUA AREA SD	106	79	31	
Lehigh	121391303 CATASAGGGAAREA 3D	637			29.2%
	121394503 NORTHERN LEHIGH SD		534	156	24.5%
Lehigh		168	124	66	39.3%
Lehigh	121394603 NORTHWESTERN LEHIGH SD	183	140	61	33.3%
Lehigh	121395103 PARKLAND SD	744	651	218	29.3%
Lehigh	121393330 ROBERTO CLEMENTE CS	28	28	18	64.3%
Lehigh	121395603 SALISBURY TOWNSHIP SD	146	123	41	28.1%
Lehigh	121395703 SOUTHERN LEHIGH SD	249	209	79	31.7%
Lehigh	121397803 WHITEHALL-COPLAY SD	355	272	150	42.3%
Luzerne	118401403 CRESTWOOD SD	279	242	141	50.6%
Luzerne	118401603 DALLAS SD	218	194	102	46.8%
Luzerne	118402603 GREATER NANTICOKE AREA SD	190	138	130	68.4%
Luzerne	118403003 HANOVER AREA SD	166	108	81	48.8%
Luzerne	118403302 HAZLETON AREA SD	746	514	319	42.8%
Luzerne	118403903 LAKE-LEHMAN SD	155	129	77	49.6%
Luzerne	118406003 NORTHWEST AREA SD	86	74	37	43.0%
Luzerne	118406602 PITTSTON AREA SD	246	205	95	38.6%
Luzerne	118408707 WEST SIDE AVTS	102	38	102	100.0%
Luzerne	118408852 WILKES-BARRE AREA SD	518	396	153	29.5%
Luzerne	118409203 WYOMING AREA SD	208	183	62	29.8%
Luzerne	118409302 WYOMING VALLEY WEST SD	356	282	183	51.4%
Lycoming	117412003 EAST LYCOMING SD	153	119	27	17.6%
Lycoming	117414003 JERSEY SHORE AREA SD	227	167	88	38.8%
Lycoming	117414203 LOYALSOCK TOWNSHIP SD	102	91	7	6.9%
Lycoming	117415004 MONTGOMERY AREA SD	71	38	23	32.4%
Lycoming	117415103 MONTOURSVILLE AREA SD	174	131	33	18.9%
•	117415303 MUNCY SD	75			
Lycoming	117416303 MONCT 3D 117416103 SOUTH WILLIAMSPORT AREA SE		63	25	33.4%
Lycoming		91	66	16	17.6%
Lycoming	117417202 WILLIAMSPORT AREA SD	368	204	155	42.1%
Mckean	109420803 BRADFORD AREA SD	253	199	117	46.2%
Mckean	109422303 KANE AREA SD	100	71	34	34.1%
Mckean	109426003 OTTO-ELDRED SD	65	40	28	43.0%
Mckean	109426303 PORT ALLEGANY SD	99	69	44	44.4%
Mckean	109427503 SMETHPORT AREA SD	69	46	31	45.0%
Mercer	104431304 COMMODORE PERRY SD	62	49	20	32.3%
Mercer	104432503 FARRELL AREA SD	68	3	44	64.7%
Mercer	104432803 GREENVILLE AREA SD	106	72	53	50.1%
Mercer	104432903 GROVE CITY AREA SD	205	166	64	31.2%
Mercer	104433303 HERMITAGE SD	190	154	84	44.2%
Mercer	104433604 JAMESTOWN AREA SD	58	36	25	43.2%
Mercer	104432830 KEYSTONE ED CTR CS	75	21	69	92.0%
		. •	<i>,</i> - •	30	52.070

Mercer	104433903 LAKEVIEW SD	126	82	59	46.7%	
Mercer	104435003 MERCER AREA SD	97	63	25	25.8%	
Mercer	104435303 REYNOLDS SD	102	67	37	36.2%	
Mercer	104435603 SHARON CITY SD	142	77	68	47.9%	
Mercer	104435703 SHARPSVILLE AREA SD	109	90	48	44.1%	
Mercer	104437503 WEST MIDDLESEX AREA SD	79	64	37	46.9%	
Mifflin Mifflin	111444602 MIFFLIN COUNTY SD 111440001 TUSCARORA BLENDED LEARNIN	437	274	202	46.3%	
Monroe	120452003 EAST STROUDSBURG AREA SD	77 701	18 355	72 345	93.5% 49.2%	
Monroe	120450003 EVERGREEN COMMUNITY CS	9	8	9	100.0%	
Monroe	120455203 PLEASANT VALLEY SD	539	0	275	51.0%	
Monroe	120450002 POCONO MOUNTAIN CHARTER 5	2	2	2	100.0%	
Monroe	120455403 POCONO MOUNTAIN SD	950	725	445	46.8%	
Мопгое	120456003 STROUDSBURG AREA SD	436	318	194	44.6%	
Montgome	123460302 ABINGTON SD	580	521	74	12.7%	
Montgome	125230001 ACHIEVEMENT HOUSE CS	81	23	56	69.1%	
Montgome	123461302 CHELTENHAM TOWNSHIP SD	395	375	148	37.5%	
Montgome Montgome	123461602 COLONIAL SD 123463603 HATBORO-HORSHAM SD	356 473	321 431	103	28.9%	
Montgome	123463803 JENKINTOWN SD	473	40	125 19	26.4% 45.3%	
Montgome	123464502 LOWER MERION SD	603	581	· 78	43.3% 13.0%	
Montgome	123464603 LOWER MORELAND TOWNSHIP	190	188	36	19.0%	
Montgome	123465303 METHACTON SD	437	388	128	29.3%	
Montgome	123465602 NORRISTOWN SD	428	349	233	54.4%	
Montgome	123465702 NORTH PENN SD	1121	997	311	27.7%	
Montgome	123466103 PERKIOMEN VALLEY SD	343	295	107	31.2%	
Montgome	123466303 POTTSGROVE SD	154	137	40	26.0%	
Montgome	123466403 POTTSTOWN SD	169	136	79	46.7%	
Montgome Montgome	123467103 SOUDERTON AREA SD 123467203 SPRINGFIELD TOWNSHIP SD	496 191	422 175	149	30.0%	
Montgome	123467303 SPRING-FORD AREA SD	442	398	79 157	41.4% 35.5%	
Montgome	123468303 UPPER DUBLIN SD	403	385	100	24.8%	
Montgome	123468402 UPPER MERION AREA SD	237	216	83	35.0%	
Montgome	123468503 UPPER MORELAND TOWNSHIP S	226	176	108	47.8%	
Montgome	123468603 UPPER PERKIOMEN SD	211	165	69	32.7%	
Montgome	123469007 WESTERN CTR FOR TECH STUD	121	62	106	87.6%	
Montgome	123469303 WISSAHICKON SD	333	307	82	24.6%	
Montour	116471803 DANVILLE AREA SD	191	155	63	33.0%	
Northampt Northampt	120480803 BANGOR AREA SD 120481002 BETHLEHEM AREA SD	309 1123	194 962	144	46.7%	
Northampt	120483302 EASTON AREA SD	698	607	540 372	48.1% 53.3%	
Northampt	120483170 LEHIGH VALLEY CHS PERFORMI	97	87	48	49.5%	
Northampt	120484803 NAZARETH AREA SD	389	349	166	42.7%	
Northampt _i	120484903 NORTHAMPTON AREA SD	463	378	167	36.1%	
Northampt _i	120485603 PEN ARGYL AREA SD	131	116	34	26.0%	
Northampt	120486003 SAUCON VALLEY SD	190	150	76	40.0%	
Northampt	120488603 WILSON AREA SD	177	134	74	41.8%	
Northumbe	116493503 LINE MOUNTAIN SD	82	62	33	40.3%	
Northumbe Northumbe	116495003 MILTON AREA SD 116495103 MOUNT CARMEL AREA SD	205 127	133 93	107 47	52.2%	
Northumbe	116496503 SHAMOKIN AREA SD	142	93 102	4 7 59	37.0% 41.5%	
Northumbe	116496603 SHIKELLAMY SD	208	118	71	34.1%	
Northumbe	116493130 SUSQ-CYBER CS	49	10	40	81.6%	
Northumbe	116498003 WARRIOR RUN SD	124	104	47	37.9%	
Perry	115503004 GREENWOOD SD	68	33	42	61.8%	
Perry	115504003 NEWPORT SD	74	.54	38	51.4%	
Perry	115506003 SUSQUENITA SD	148	104	73	49.3%	•
Perry	115508003 WEST PERRY SD	193	107	90	46.7%	
Philadelphi	126510020 AGORA CYBER CS	30	10	22	73.3%	
Philadelphi Philadelphi	126513190 ARCH AND DESIGN CHS	131	0 75	60	45.8%	
Philadelphi Philadelphi	126512840 COMM ACAD OF PHILA CS 126513470 DELAWARE VALLEY CHS	132 140	75 00	112	84.9%	
Philadelphi	126513470 DELAWARE VALLET CHS 126513450 FRANKLIN TOWNE CHS	179	99 149	118 81	84.3% 45.3%	
Philadelphi	126513270 FREIRE CS	74	68	45	45.3% 60.9%	
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,Philadelphi	126510003 HOPE CS	68	49	68	100.0%
Philadelphi	126512980 IMHOTEP INSTITUTE CS	104	104	76	73.1%
Philadelphi	126513480 MARIANA BRACETTI ACAD CS	80	72	53	66.2%
Philadelphi	126510014 MARITIME ACADEMY CS	35	30	32	91.5%
Philadelphi Philadelphi	126513150 MAST COMMUNITY CS 126510002 MASTERY CHARTER HIGH SCHO	85	83	26	30.5%
Philadelphi Philadelphi	126513230 MATH CIVICS & SCIENCES CS	77 60	75 60	28 31	36.4% 51.7%
Philadelphi	126513000 MULTI-CULTURAL ACADEMY CS	23	23	17	73.9%
Philadelphi	126510018 NEW MEDIA TECHNOLOGY CS	69	63	51	73.9%
Philadelphi	126513440 NUEVA ESPERANZA ACAD CS	143	137	113	79.0%
Philadelphi	126510009 PHILA ELEC & TECH CHS	134	76	75	56.0%
Philadelphi Philadelphi	126513280 PHILADELPHIA ACAD CS 126515001 PHILADELPHIA CITY SD	104 8732	74	68	65.4%
Philadelphi	126512960 PREPARATORY CS	149	5089 126	5690 48	65.2% 32.1%
Philadelphi	126512860 WORLD COMMUNICATIONS CS	44	44	10	22.8%
Philadelphi -	126512870 Youth Build Phila CS	97	45	97	100.0%
Pike	120522003 DELAWARE VALLEY SD	446	377	129	28.9%
Potter	109530304 AUSTIN AREA SD	18	9	8	44.5%
Potter	109531304 COUDERSPORT AREA SD	66	51	12	18.2%
Potter Potter	109532804 GALETON AREA SD 109535504 NORTHERN POTTER SD	22 49	10 27	9 22	41.0% 44.9%
Potter	109537504 OSWAYO VALLEY SD	44	26	13	44.9% 29.5%
Schuylkill	129540803 BLUE MOUNTAIN SD	226	183	62	27.4%
Schuylkill	129544503 MAHANOY AREA SD	88	71	55	62.4%
Schuylkill	129544703 MINERSVILLE AREA SD	97	74	41	42.3%
Schuylkill	129545003 NORTH SCHUYLKILL SD	155	111	66	42.5%
Schuylkill Schuylkill	129546003 PINE GROVE AREA SD 129546103 POTTSVILLE AREA SD	131 275	91 199	66 147	50.3% 53.5%
Schuylkill	129547303 SCHUYLKILL HAVEN AREA SD	99	74	56	56.6%
Schuylkill	129547203 SHENANDOAH VALLEY SD	72	48	41	57.0%
Schuylkill	129547603 TAMAQUA AREA SD	156	137	73	46.8%
Schuylkill	129547803 TRI-VALLEY SD	73	50	30	41.1%
Schuylkill	129548803 WILLIAMS VALLEY SD	91	64	54	59.3%
Snyder Snyder	116555003 MIDD-WEST SD 116557103 SELINSGROVE AREA SD	164 209	81 161	59 82	36.0%
Somerset	108561003 BERLIN BROTHERSVALLEY SD	82	60	62 28	39.2% 34.1%
Somerset	108561803 CONEMAUGH TOWNSHIP AREA (96	78	29	30.2%
Somerset	108565203 MEYERSDALE AREA SD	81	53 .	34	42.1%
Somerset	108565503 NORTH STAR SD	101	81	40	39.6%
Somerset	108566303 ROCKWOOD AREA SD	65	0	22	33.8%
Somerset Somerset	108567004 SALISBURY-ELK LICK SD 108567204 SHADE-CENTRAL CITY SD	35 47	25 25	12 25	34.3%
Somerset	108567404 SHANKSVILLE-STONYCREEK SD	47 45	30	25 13	53.3% 28.8%
Somerset	108567703 SOMERSET AREA SD	221	149	85	38.4%
Somerset	108568404 TURKEYFOOT VALLEY AREA SD	18	7	10	55.7%
Somerset	108569103 WINDBER AREA SD	99	79	30	30.2%
Sullivan	117576303 SULLIVAN COUNTY SD	56 76	34 55	13	23.2%
Susquehar Susquehar	119581003 BLUE RIDGE SD 119582503 ELK LAKE SD	76 101	55 75	33 45	43.5%
Susquehar	119583003 FOREST CITY REGIONAL SD	67	75 40	45 43	44.6% 64.2%
Susquehar	119584503 MONTROSE AREA SD	154	129	72	46.8%
Susquehar	119584603 MOUNTAIN VIEW SD	105	90	55	52.4%
Susquehar	119586503 SUSQUEHANNA COMM SD	62	50	24	38.7%
Tioga	117596003 NORTHERN TIOGA SD	169	119	79	46.7%
Tioga	117597003 SOUTHERN TIOGA SD 117598503 WELLSBORO AREA SD	186 107	116	90	48.3%
Tioga Union	11/598503 WELLSBURG AREA SD 116604003 LEWISBURG AREA SD	107 166	82 134	44 39	41.1% 23.5%
Union	116605003 MIFFLINBURG AREA SD	189	124	81	42.8%
Venango	106611303 CRANBERRY AREA SD	98	70	32	32.6%
Venango	106612203 FRANKLIN AREA SD	179	109	76	42.5%
Venango	106616203 OIL CITY AREA SD	191	125	82	42.9%
Venango	106617203 TITUSVILLE AREA SD	159	120	56	35.2%
Venango Warren	106618603 VALLEY GROVE SD 105620001 TIDIOUTE COMMUNITY CS	70 15	49 8	25 13	35.7% 86.7%
v vali Cii	100020001 FIDIOUTE COMMUNITITIOS	10	. 0	13	86.7%

_s Warren	105628302 WARREN COUNTY SD	428	305	118	27.6%	
Washingto	101630504 AVELLA AREA SD	62	47	27	43.6%	
Washingto	101630903 BENTWORTH SD	92	80	28	30.5%	
Washingto	101631003 BETHLEHEM-CENTER SD	95	65 .	46	48.5%	
Washingto	101631203 BURGETTSTOWN AREA SD	116	93	35	30.2%	
Washingto	101631503 CALIFORNIA AREA SD	76	72	36	47.4%	
Washingto	101631703 CANON-MCMILLAN SD	329	288	137	41.7%	
Washingto	101631803 CHARLEROI SD	101	88	41	40.5%	
Washingto	101631903 CHARTIERS-HOUSTON SD	102	81	51	49.9%	
Washingto	101632403 FORT CHERRY SD	90	65	36	39.9%	
Washingto	101633903 MCGUFFEY SD	158	104	73	46.2%	
Washingto	101636503 PETERS TOWNSHIP SD	351	328	34	9.7%	
Washingto	101637002 RINGGOLD SD	266	203	144	54.2%	
Washingto	101638003 TRINITY AREA SD 101638803 WASHINGTON SD	272 124	216	80	29.4%	
Washingto Wayne	119648303 WALLENPAUPACK AREA SD	301	88 238	43 79	34.7%	
Wayne	119648703 WAYNE HIGHLANDS SD	258	236 184		26.2%	
Wayne	119648903 WESTERN WAYNE SD	∠58 186	184	90 111	34.8% 59.6%	
Westmorel	107650603 BELLE VERNON AREA SD	239	184	85	35.6%	
Westmorel	107650703 BURRELL SD	165	144	67	40.5%	
Westmorel	107651603 DERRY AREA SD	210	183	96	45.6%	
Westmorel	107652603 FRANKLIN REGIONAL SD	320	282	81	25.3%	
Westmorel	107653102 GREATER LATROBE SD	317	269	92	29.1%	
Westmorel	107653203 GREENSBURG SALEM SD	224	138	39	17.4%	
Westmorel	107653802 HEMPFIELD AREA SD	503	430	182	36.2%	
Westmorel	107654103 JEANNETTE CITY SD	91	70	25	27.5%	
Westmorel	107654403 KISKI AREA SD	325	285	119	36.7%	
Westmorel	107654903 LIGONIER VALLEY SD	165	127	47	28.5%	
Westmorel	107655803 MONESSEN CITY SD	80	60	29	36.3%	
Westmorel	107655903 MOUNT PLEASANT AREA SD	188	157	56	29.8%	
Westmorel	107656303 NEW KENSINGTON-ARNOLD SD	130	90	49	37.8%	
Westmorel	107656502 NORWIN SD	398	314	97	24.4%	
Westmorel	107657103 PENN-TRAFFORD SD	359	308	106	29.6%	
Westmorel	107653040 RIDGEVIEW ACAD CS	25	10	22	88.0%	
Westmorel	107657503 SOUTHMORELAND SD	153	124	61	39.9%	
Westmorel	107658903 YOUGH SD	190	140	95	50.0%	
Wyoming	119665003 LACKAWANNA TRAIL SD	95	67	63	66.3%	
Wyoming	118667503 TUNKHANNOCK AREA SD	259	189	84	32.4%	
York	112671303 CENTRAL YORK SD	349	281	- 85	24.3%	
York	112673300 Crispus Attucks Youthbuild CS	46	3	46	100.0%	
York	112671603 DALLASTOWN AREA SD	435	343	112	25.7%	
York	112671803 DOVER AREA SD	207	150	67	32.4%	
York	112672203 EASTERN YORK SD	175	119	77	43.9%	
York	112672803 HANOVER PUBLIC SD	104	68	48	46.1%	
York	112674403 NORTHEASTERN YORK SD	214	155	55	25.7%	
York	115674603 NORTHERN YORK CO SD	258	179	117	45.4%	
York	112675503 RED LION AREA SD	366	270	127	34.7%	
York	112676203 SOUTH EASTERN SD	247	193	128	51.8%	
York	112676403 SOUTH WESTERN SD	299	241	115	38.5%	
York	112676503 SOUTHERN YORK CO SD	282	219	97 103	34.5%	
York York	112676703 SPRING GROVE AREA SD 115219002 WEST SHORE SD	283 625	222 485	103	36.3%	
York	112678503 WEST YORK AREA SD	625 167	485 151	278 24	44.5%	
York	112678003 WEST YORK AREA SD 112679002 YORK CITY SD	254	151 80	2 4 184	14.4% 72.4%	
York York	112679002 YORK CITY SD 112679107 YORK CO SCHOOL OF TECH	25 4 98	80 21	184 0	72.4%	
York	112679107 FORK CO SCHOOL OF FECH 112679205 York County HS	96 185	21 85	185	0.0% 100.0%	
York	112679203 YORK COUNTY ITS 112679403 YORK SUBURBAN SD	179	65 159	48	26.8%	
1 0112	TIEDIOTOO TOTAL OODONDAN OD	113	100	70	20.070	

REMEDIATION REPORT

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Adams	Bermudian Springs SD	65	21	32%	37	\$10,991	\$2,574	\$11,908	\$25,473
Adams	Conewago Valley SD	127	53	42%	83	\$24,436	\$5,928	\$25,931	\$56,295
Adams	Fairfield Area SD	40	16	40%	26	\$7,856	\$1,716	\$8,839	\$18,411
Adams	Gettysburg Area SD	152	47	31%	74	\$21,759	\$5,304	\$23,024	\$50,087
Adams	Littlestown Area SD	78	28	36%	50	\$14,585	\$3,666	\$15,139	\$33,389
Adams	Upper Adams SD	74	28	38%	49	\$14,523	\$3,432	\$15,652	\$33,607
Allegheny	Allegheny Valley SD	58	19	33%	45	\$13,606	\$2,964	\$15,329	\$31,899
Allegheny	Avonworth SD	54	19	35%	49	\$14,077	\$3,744	\$14,067	\$31,888
Allegheny	Baldwin-Whitehall SD	86	16	19%	17	\$6,742	\$0	\$11,479	\$18,221
Allegheny	Bethel Park SD	248	71	29%	138	\$41,896	\$8,970	\$47,616	\$98,482
Allegheny	Brentwood Borough SD	77	27	35%	46	\$14,003	\$2,964	\$16,004	\$32,971
Allegheny	Carlynton SD	79	26	33%	54	\$15,948	\$3,822	\$17,047	\$36,817
Allegheny	Chartiers Valley SD	140	45	32%	83	\$24,882	\$5,616	\$27,516	\$58,014
Allegheny	City CHS	68	43	63%	109	\$32,739	\$7,332	\$36,355	\$76,425
Allegheny	Clairton City SD	40	24	60%	70	\$20,954	\$4,758	\$23,096	\$48,808
Allegheny	Cornell SD	14	8	57%	12	\$3,643	\$780	\$4,141	\$8,564
Allegheny	Deer Lakes SD	92	20	22%	34	\$10,359	\$2,184	\$11,864	\$24,407
Allegheny	DUQUESNE CITY SD	16	8	50%	19	\$5,861	\$1,170	\$6,886	\$13,917
Allegheny	East Allegheny SD	49	26	53%	64	\$18,798	\$4,602	\$19,837	\$43,237
Allegheny	Elizabeth Forward SD	145	59	41%	136	\$40,211	\$9,594	\$43,095	\$92,900
Allegheny	Fox Chapel Area SD	157	47	30%	112	\$32,924	\$8,034	\$34,814	\$75,772
Allegheny	Gateway SD	264	75	28%	161	\$47,559	\$11,388	\$50,863	\$109,809
Allegheny	Hampton Township SD	152	37	24%	74	\$21,871	\$5,226	\$23,420	\$50,517
Allegheny	Highlands SD	126	30	24%	62	\$18,674	\$4,134	\$20,864	\$43,672
Allegheny	Keystone Oaks SD	151	. 62	41%	146	\$42,391	\$10,842	\$43,508	\$96,741
Allegheny	McKeesport Area SD	145	69	48%	174	\$51,041	\$12,558	\$53,697	\$117,296
Allegheny	Montour SD	157	56	36%	106	\$31,772	\$7,176	\$35,122	\$74,070
Allegheny	Moon Area SD	168	43	26%	85	\$25,452	\$5,772	\$28,074	\$59,298
Allegheny	Mt Lebanon SD	159	37	23%	62	\$18,339	\$4,368	\$19,676	\$42,383
Allegheny	North Allegheny SD	339	67	20%	143	\$42,429	\$9,984	\$45,841	\$98,253
Allegheny	North Hills SD	285	73	26%	167	\$49,046	\$12,012	\$51,744	\$112,802
Allegheny	Northgate SD	73	30	41%	69	\$20,334	\$4,914	\$21,629	\$46,877

Allegheny	NORTHSIDE URBAN PATHW	11	10	91%	23	\$6,890	\$1,560	\$7,606	\$16,055
Allegheny	PA LEARNERS ONLINE CS	11	5	45%	9			\$3,304	\$6,638
Allegheny	Penn Hills SD	312	138	44%	292	\$86,121	\$20,748	\$91,771	\$198,640
Allegheny	Pine-Richland SD	169	36	21%	57	\$17,696	\$3,432	\$21,054	\$42,182
Allegheny	Pittsburgh SD	1,030	550	53%	1,429		\$100,230	\$455,752	\$979,314
Allegheny	Plum Borough SD	242	77	32%	165	\$48,587	\$11,778	\$51,583	\$111,948
Allegheny	Quaker Valley SD	59	19	32%	41	\$11,908	\$3,042	\$12,232	\$27,182
Allegheny	Riverview SD	62	23	37%	49	\$15,192	\$2,964	\$18,030	\$36,186
Allegheny	Shaler Area SD	339	126	37%	304	\$88,983	\$22,074	\$93,137	\$204,194
Allegheny	South Allegheny SD	79	43	54%	103	\$29,690	\$7,800	\$29,926	\$67,415
Allegheny	South Fayette Township SD	85	24	28%	38	\$11,499	\$2,496	\$12,980	\$26,975
Allegheny	South Park SD	130	40	31%	79	\$23,631	\$5,382	\$26,004	\$55,016
Allegheny	Steel Valley SD	76	32	42%	80	\$23,469	\$5,772	\$24,698	\$53,939
Allegheny	Sto-Rox SD	32	17	53%	44	\$12,540	\$3,432	\$12,276	\$28,248
Allegheny	Upper Saint Clair SD	121	21	17%	40	\$12,293	\$2,496	\$14,330	\$29,119
Allegheny	West Allegheny SD	129	45	35%	83	\$24,771	\$5,694	\$27,120	\$57,584
Allegheny	WEST JEFFERSON HILLS SD	159	50	31%	124	\$36,344	\$8,970	\$38,162	\$83,476
Allegheny	West Mifflin Area SD	188	79	42%	187	\$54,969		\$58,117	\$126,501
Allegheny	Wilkinsburg Borough SD	36	24	67%	49	\$15,416	\$2,808	\$18,822	\$37,046
Allegheny	Woodland Hills SD	205	103	50%	253	\$73,779	\$18,564	\$76,531	\$168,873
Allegheny	Career Connections Charter	19	10		30		<u> </u>		\$19,260
Armstrong	Apollo-Ridge SD	58	12	21%	18	\$5,911	\$858	\$7,796	\$14,565
Armstrong	Armstrong SD	245	48	20%	63	\$21,972	\$2,106	\$31,842	\$55,920
Armstrong	Freeport Area SD	90	21	23%	28	\$9,765		\$14,152	\$24,853
Armstrong	Leechburg Area SD	35	8	23%	11	\$3,581	\$546	\$4,654	\$8,781
Armstrong	Lenape Tech	35	9	26%	10	\$3,966	\$0	\$6,753	\$10,718
Beaver	Aliquippa SD	59	28	47%	61	\$18,612	\$3,900		\$43,890
Beaver	Ambridge Area SD	122	39	32%	65	\$19,752	\$4,212	\$22,494	\$46,458
Beaver	Beaver Area SD	115	49	43%	70	\$20,508	\$5,070		\$47,089
Beaver	Big Beaver Falls Area SD	86	28	33%	48	\$14,461	\$3,198		\$33,825
Beaver	Blackhawk SD	134	33	25%	54	\$16,617	\$3,354		\$39,396
Beaver	Center Area SD	121	38	31%	65	\$18,971	\$4,758		\$43,449
Beaver	Freedom Area SD	87	29	33%	51	\$14,870			\$34,031
Beaver	Hopewell Area SD	126	33	26%	54	\$15,836			\$36,387
Beaver	Monaca SD	45	15	33%	29	\$8,265	\$2,262	\$8,091	\$18,618
Beaver	New Brighton Area SD	89	22	25%	29	\$8,823	\$1,872	\$10,072	\$20,767
Beaver	PA CYBER CS	54	3	6%	3	\$1,190	\$0	\$2,026	\$3,215

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Beaver	Riverside Beaver County SD	89	24	27%	39	\$11,896	\$2,496	\$13,655	\$28,047
Beaver	Rochester Area SD	52	17	33%	36	\$10,372	\$2,730	\$10,440	\$23,542
Beaver	South Side Area SD	50	. 8	16%	16	\$4,895	\$1,014	\$5,653	\$11,561
Beaver	Western Beaver County SD	53	17	32%	31	\$9,616	\$1,872	\$11,423	\$22,911
Beaver	Lincoln Park Performing Arts	9	5	56%	6	\$1,710	\$468	\$1,674	\$3,852
Bedford	Bedford Area SD	25	1	4%	1	\$397	\$0	\$675	\$1,072
Bedford	Chestnut Ridge SD	13	1	8%	1	\$397	\$0	\$675	\$1,072
Bedford	Northern Bedford County SD	10	2	20%	3	\$1,190	\$0	\$2,026	\$3,215
Bedford	Tussey Mountain SD	11	1	9%	1	\$397	\$0	\$675	\$1,072
Berks	Antietam SD	34	17	50%	26	\$7,968	\$1,638	\$9,235	\$18,841
Berks	Boyertown Area SD	299	88	29%	152	\$44,882	\$10,764	\$47,956	\$103,602
Berks	Brandywine Heights Area SD	. 27	16	59%	41	\$11,685	\$3,198	\$11,439	\$26,322
Berks	Conrad Weiser Area SD	115	41	36%	83	\$25,217	\$5,382	\$28,705	\$59,304
Berks	Daniel Boone Area SD	141	41	29%	80	\$23,581	\$5,694	\$25,094	\$54,369
Berks	Exeter Township SD	192	57	30%	126	\$36,356	\$9,516	\$36,739	\$82,611
Berks	Fleetwood Area SD	83	26	31%	38	\$11,165	\$2,730	\$11,791	\$25,685
Berks	Governor Mifflin SD	198	84	42%	154	\$45,787	\$10,686	\$49,702	\$106,175
Berks	Hamburg Area SD	87	20	23%	46	\$13,222	\$3,510	\$13,230	\$29,962
Berks	Kutztown Area SD	77	16	21%	32	\$9,455	\$2,262	\$10,117	\$21,833
Berks	Muhlenberg SD	175	66	38%	137	\$39,714	\$10,218	\$40,601	\$90,533
Berks	Oley Valley SD	78	27	35%	44	\$13,098	\$3,042	\$14,257	\$30,397
Berks	Reading SD	437	296	68%	592	\$173,406	\$42,900	\$181,811	\$398,117
Berks	Schuylkill Valley SD	82	25	30%	48	\$14,126	\$3,432	\$14,977	\$32,535
Berks	Tulpehocken Area SD	25	14	56%	22	\$6,270	\$1,716	\$6,138	\$14,124
Berks	Twin Valley SD	90	21	23%	35	\$10,310	\$2,496	\$10,954	\$23,759
Berks	Wilson SD	234	74	32%	∤156	\$45,241	\$11,622	\$46,298	\$103,161
Berks	Wyomissing Area SD	47	19	40%	36	\$10,595	\$2,574	\$11,233	\$24,401
Blair	Altoona Area SD	86	15	17%	18	\$7,138	\$0	\$12,155	\$19,293
Blair	Claysburg-Kimmel SD	11	1	9%	1	\$397	\$0	\$675	\$1,072
Blair	Hollidaysburg Area SD	47	5	11%	7	\$2,776	\$0	\$4,727	\$7,503
Blair	Spring Cove SD	1	1	100%	1	\$285	\$78	\$279	\$642
Blair	Tyrone Area SD	16	5	31%	5	\$1,983	\$0	\$3,376	\$5,359
Blair	Williamsburg Community SD	1	1	100%	1	\$285	\$78	\$279	\$642
Bradford	Athens Area SD	31	7	23%	8	\$3,173	\$0	\$5,402	\$8,575
Bradford	Canton Area SD	21	7	33%	9	\$3,569	\$0	\$6,077	\$9,646
Bradford	Sayre Area SD	35	4	11%	5	\$1,871	\$78	\$2,980	\$4,929
Bradford	Towanda Area SD	25	3	12%	3	\$1,190	\$0	\$2,026	\$3,215

Bradford	Troy Area SD	21	1	5%		\$793	\$0		\$2,14
Bradford	Wyalusing Area SD	27	3	11%		\$1,760	\$156	\$2,584	\$4,49
Bucks	Bensalem Township SD	305	163	53%		\$91,349	\$24,024	\$92,009	\$207,38
Bucks	Bristol Borough SD	43	23	53%		\$13,148	\$2,730	\$15,167	\$31,04
Bucks	Bristol Township SD	231	139	60%	259	\$75,489	\$19,032	\$78,205	\$172,72
Bucks	Bucks County Technical High \$	9	2	22%	2	\$793	\$0	\$1,351	\$2,14
Bucks	Centennial SD	317	125	39%	195	\$57,695	\$13,728	\$61,934	\$133,35
Bucks	Central Bucks SD	933	281	30%	442	\$129,094	\$32,292	\$134,413	\$295,79
Bucks	Council Rock SD	701	237	34%		\$109,491	\$27,144	\$114,649	\$251,28
Bucks	Morrisville Borough SD	31	18	58%	38	\$10,942	\$2,886	\$10,998	\$24,82
Bucks	Neshaminy SD	590	243	41%	394	\$114,410	\$29,250	\$117,455	\$261,1
Bucks	New Hope-Solebury SD	43	13	30%	23	\$6,778	\$1,638	\$7,210	\$15,62
Bucks	Palisades SD	95	28	29%	38	\$11,276	\$2,652	\$12,187	\$26,11
Bucks	Pennridge SD	395	146	37%	258	\$75,538	\$18,720	\$79,115	\$173,37
Bucks	Pennsbury SD	544	222	41%	388	\$113,481	\$28,236	\$118,555	\$260,2
Bucks	Quakertown Community SD	194	72	37%	128	\$38,265	\$8,736	\$42,052	\$89,0
Butler	Butler Area SD	477	129	27%	207	\$60,334	\$15,210	\$62,508	\$138,0
Butler	Karns City Area SD	87	18	21%	27	\$7,918	\$1,950	\$8,326	\$18,1
Butler	Mars Area SD	117	30	26%		\$13,036	\$2,808	\$14,771	\$30,6
Butler	Moniteau SD	58	22	38%	43	\$12,255	\$3,354	\$11,997	\$27,6
Butler	Seneca Valley SD	301	88	29%	134	\$40,756	\$8,658	\$46,500	\$95,9
Butler	Slippery Rock Area SD	129	22	17%	32	\$9,678	\$2,106		\$22,6
Butler	South Butler County SD	170	42	25%	71	\$20,793	\$5,148	\$21,790	\$47,7
Cambria	Blacklick Valley SD	39	4	10%	5	\$1,537	\$312	\$1,791	\$3,6
Cambria	Cambria Heights SD	64	4	6%	5	\$1,537	\$312	\$1,791	\$3,6
Cambria	Central Cambria SD	127	. 14	11%	18	\$5,799	\$936	\$7,400	\$14,1
Cambria	Conemaugh Valley SD	46	8	17%	10	\$3,296	\$468	\$4,375	\$8,1
Cambria	Ferndale Area SD	30	3	. 10%	3	\$1,078	\$78	\$1,630	\$2,7
Cambria	Forest Hills SD	145	. 22	15%	34	\$10,248	\$2,262	\$11,467	\$23,9
Cambria	Greater Johnstown SD	108	18	17%	31	\$9,951	\$1,638	\$12,612	\$24,2
Cambria	Northern Cambria SD	36	. 3	8%		\$1,190	\$0		\$3,2
Cambria	Penn Cambria SD	67	8	12%	12	\$3,643	\$780	\$4,141	\$8,5
Cambria	Portage Area SD	27	4	15%	7	\$1,995	\$546	\$1,953	\$4,4
Cambria	Richland SD	100	10	10%	13	\$4,151	\$702	\$5,212	\$10,0
Cambria	Westmont Hilltop SD	141	18	13%	23	\$7,559	\$1,092	\$9,983	\$18,6
Cameron	Cameron County SD	22	7	32%	9	\$3,569	\$0	\$6,077	\$9,6
Carbon	Jim Thorpe Area SD	89	28	31%	44	\$13,209	\$2,964	\$14,654	\$30,8

Carbon	Lehighton Area SD	120	37	31%	63	\$18,178	\$4,758	\$18,370	\$41,306
Carbon	Palmerton Area SD	88	25	28%	44	\$12,652	\$3,354	\$12,672	\$28,678
Carbon	Panther Valley SD	76	27	36%	48	\$14,238	\$3,354	\$15,373	\$32,965
Carbon	Weatherly Area SD	30	4	13%	5	\$1,648	\$234	\$2,188	\$4,070
Centre	Bald Eagle Area SD	199	82	41%	221	\$63,431	\$16,926	\$63,244	\$143,601
Centre	Bellefonte Area SD	53	1	2%	1	\$397	\$0	\$675	\$1,072
Centre	Penns Valley Area SD	24	3	13%	4	\$1,586	\$0	\$2,701	\$4,287
Centre	State College Area SD	61	13	21%	16	\$6,345	\$0	\$10,804	\$17,149
Chester	Avon Grove SD	173	41	24%	64	\$21,029	\$3,042	\$27,762	\$51,834
Chester	Center for Arts & Technology	2	1	50%	1	\$397	\$0	\$675	\$1,072
Chester	Coatesville Area SD	209	96	46%	176	\$54,735	\$10,530	\$65,350	\$130,615
Chester	COLLEGIUM CS	2	2	100%	6	\$2,045	\$234	\$2,863	\$5,141
Chester	Downingtown Area SD	486	171	35%	297	\$88,997	\$20,124	\$98,317	\$207,437
Chester	Great Valley SD	126	44	35%	68	\$20,273	\$4,680	\$22,142	\$47,095
Chester	Kennett Consolidated SD	83	31	37%	51	\$15,874	\$3,042	\$18,984	\$37,900
Chester	Octorara Area SD	94	33	35%	62	\$18,228	\$4,446	\$19,279	\$41,953
Chester	Owen J Roberts SD	179	59	33%	106	\$30,879	\$7,800	\$31,952	\$70,631
Chester	Oxford Area SD	97	23	24%	36	\$12,045	\$1,560	\$16,384	\$29,989
Chester	Phoenixville Area SD	143	50	35%	96	\$28,476	\$6,708	\$30,747	\$65,930
Chester	RENAISSANCE ACAD CS	5	2	40%	4	\$1,363	\$156	\$1,909	\$3,428
Chester	Tredyffrin-Easttown SD	97	19	20%	35	\$10,979	\$2,028	\$13,331	\$26,338
Chester	Unionville-Chadds Ford SD	87	22	25%	32	\$10,571	\$1,482	\$14,079	\$26,132
Chester	West Chester Area SD	386	131	34%	225	\$68,811	\$14,274	\$79,418	\$162,503
Chester ·	21st Century Cyber Charter Sc	6	4	67%	7	\$1,995	\$546	\$1,953	\$4,494
Clarion	Allegheny-Clarion Valley SD	42	10	24%	14	\$4,771	\$546	\$6,680	\$11,997
Clarion	Clarion Area SD	57	17	30%	20	\$7,932	\$0	\$13,505	\$21,437
Clarion	Clarion-Limestone Area SD	40	9	23%	10	\$3,966	\$0	\$6,753	\$10,718
Clarion	Keystone SD	54	17	31%	18	\$7,027	\$78	\$11,758	\$18,863
Clarion	North Clarion County SD	34	4	12%	- 5	\$1,983	\$0	\$3,376	\$5,359
Clarion	Redbank Valley SD	77	21	27%	24	\$9,183	\$234	\$15,017	\$24,434
Clarion	Union SD	38	16	42%	19	\$7,200	\$234	\$11,641	\$19,075
Clearfield	Clearfield Area SD	86	8	9%	12	\$4,759	\$0	\$8,103	\$12,862
Clearfield	Curwensville Area SD	45	9	20%	10	\$3,966	\$0	\$6,753	\$10,718
Clearfield	Dubois Area SD	106	15	14%	18	\$7,138	\$0	\$12,155	\$19,293
Clearfield	Glendale SD	21	2	10%	3	\$1,190	\$0	\$2,026	\$3,215
Clearfield	Harmony Area SD	15	4	27%	6	\$1,933	\$312	\$2,467	\$4,712
Clearfield	Moshannon Valley SD	27	4	15%	4	\$1,586	\$0	\$2,701	\$4,287

Clearfield	Philipsburg-Osceola Area SD	73	9	12%	10	\$3,966	\$0	\$6,753	\$10,718
Clearfield	West Branch Area SD	38	4	11%	4	\$1,586	\$0	\$2,701	\$4,287
Clinton	Keystone Central SD	179	13	7%	17	\$6,630	\$78	\$11,083	\$17,791
Columbia	Benton Area SD	35	7	20%	17.	\$6,072	\$468	\$9,102	\$15,642
Columbia	Berwick Area SD	158	39	25%	62	\$19,232	\$3,744	\$22,846	\$45,822
Columbia	Bloomsburg Area SD	93	18	19%	24	\$8,402	\$780	\$12,244	\$21,426
Columbia	Central Columbia SD	125	17	14%	31	\$11,290	\$702	\$17,367	\$29,358
Columbia	Columbia-Montour AVTS	18	3	17%	4	\$1,586	\$0	\$2,701	\$4,287
Columbia	Millville Area SD	40	8	20%	10	\$3,073	\$624	\$3,583	\$7,280
Columbia	Southern Columbia Area SD	105	15	14%	23	\$7,448	\$1,170	\$9,587	\$18,205
Crawford	Conneaut SD	73	15	21%	19	\$7,535	\$0	\$12,830	\$20,365
Crawford	Crawford Central SD	106	15	14%	21	\$8,328	\$0	\$14,180	\$22,508
Crawford	Penncrest SD	139	19	14%	25	\$9,691	\$156	\$16,089	\$25,936
Cumberland	Big Spring SD	98	19	19%	27	\$8,364	\$1,638	\$9,911	\$19,913
Cumberland	Camp Hill SD	45	11	24%	17	\$5,291	\$1,014	\$6,328	\$12,633
Cumberland	Carlisle Area SD	199	74	37%	122	\$36,221	\$8,502	\$39,189	\$83,912
Cumberland	Cumberland Valley SD	419	126	30%	210	\$61,747	\$15,054	\$65,326	\$142,127
Cumberland	East Pennsboro Area SD	140	50	36%	95	\$27,410	\$7,176	\$27,694	\$62,279
Cumberland	Mechanicsburg Area SD	182	60	33%	101	\$29,678	\$7,254	\$31,349	\$68,281
Cumberland	Shippensburg Area SD	152	21	14%	30	\$11,116	\$546	\$17,484	\$29,146
Cumberland	South Middleton SD	104	30	29%	46	\$14,003	\$2,964	\$16,004	\$32,971
Dauphin	Central Dauphin SD	623	231	37%	418	\$122,701	\$30,108	\$129,302	\$282,111
Dauphin	Dauphin County AVTS	5	3	60%	4	\$1,586	\$0	\$2,701	\$4,287
Dauphin	Derry Township SD	104	32	31%	52	\$15,155	\$3,822	\$15,697	\$34,673
Dauphin	Halifax Area SD	62	22	35%	32	\$9,455	\$2,262	\$10,117	\$21,833
Dauphin	Harrisburg City SD	153	103	67%	237	\$71,450	\$15,756	\$79,992	\$167,198
Dauphin	Lower Dauphin SD	178	48	27%	97	\$28,761	\$6,786	\$31,026	\$66,572
Dauphin	Middletown Area SD	119	53	45%	83	\$24,771	\$5,694	\$27,120	\$57,584
Dauphin	Millersburg Area SD	49	21	43%	35	\$10,310	\$2,496	\$10,954	\$23,759
Dauphin	Steelton-Highspire SD	41	20	49%	29	\$9,269	\$1,560	\$11,657	\$22,486
Dauphin	Susquehanna Township SD	178	78	44%	150	\$44,424	\$10,530	\$47,794	\$102,747
Dauphin	Upper Dauphin Area SD	59	23	39%	44	\$12,763	\$3,276	\$13,069	\$29,108
Delaware	Chester-Upland SD	91	57	63%	129	\$37,434	\$9,594	\$38,369	\$85,397
Delaware [.]	Chichester SD	77	28	36%	50	\$15,254	\$3,198	\$17,516	\$35,968
Delaware	Garnet Valley SD	136	31	23%	51	\$15,204	\$3,510	\$16,607	\$35,321
Delaware	Haverford Township SD	291	150	52%	272	\$79,194	\$20,046	\$81,832	\$181,071
Delaware	Interboro SD	160	97	61%	166	\$48,426	\$12,168	\$50,277	\$110,870

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Delaware	Marple Newtown SD	174	63	36%	105	\$31,710	\$6,942	\$35,635	\$74,287
Delaware	Penn-Delco SD	136	66	49%	126	\$37,026	\$9,048	\$39,117	\$85,190
Delaware	Radnor Township SD	79	26	33%	59	\$17,484	\$4,134	\$18,839	\$40,457
Delaware	Ridley SD	335	129	39%	235	\$68,314	\$17,394	\$70,320	\$156,028
Delaware	Rose Tree Media SD	165	81	49%	147	\$43,011	\$10,686	\$44,976	\$98,672
Delaware	Southeast Delco SD	135	118	87%	225	\$66,580	\$15,834	\$71,493	\$153,906
Delaware	Springfield SD	200	105	53%	214	\$62,664	\$15,522	\$65,650	\$143,835
Delaware	Upper Darby SD	579	343	59%	684	\$197,060	\$51,870	\$198,365	\$447,295
Delaware	Wallingford-Swarthmore SD	101	52	51%	94	\$27,794	\$6,630	\$29,792	\$64,216
Delaware	William Penn SD	153	115	75%	222	\$66,394	\$15,132	\$73,033	\$154,559
Elk `	Johnsonburg Area SD	34	5	15%	6	\$2,268	\$78	\$3,655	\$6,001
Elk	Ridgway Area SD	37	6	16%	6	\$2,379	\$0	\$4,052	\$6,431
Elk	Saint Marys Area SD	89	13	15%	15	\$5,949	\$0	\$10,129	\$16,077
Erie	Corry Area SD	47	11	23%	16	\$6,345	\$0	\$10,804	\$17,149
Erie	Erie City SD	166	41	25%	56	\$22,208	\$0	\$37,814	\$60,023
Erie	Fairview SD	51	6	12%	11	\$4,362	\$0	\$7,428	\$11,790
Erie	Fort LeBoeuf SD	63	10	16%	13	\$5,156	\$0	\$8,778	\$13,934
Erie	General McLane SD	128	22	17%	32	\$12,691	\$0	\$21,608	\$34,299
Erie	Girard SD	44	9	20%	11	\$4,362	\$0	\$7,428	\$11,790
Erie	Harbor Creek SD	44	8	18%		\$3,966	\$0		\$10,718
Erie	Iroquois SD	24	6	25%		\$3,173	\$0	\$5,402	\$8,575
Erie	Millcreek Township SD	222	41	18%		\$21,415	\$0		\$57,879
Erie	North East SD	49	9	18%		\$3,966	\$0		\$10,718
Erie	Northwestern SD	61	12	20%		\$5,949	\$0		\$16,077
Erie	Perseus House CS of Excellen	7	3	43%		\$1,983	\$0		\$5,359
Erie	Union City Area SD	31	10	32%		\$4,759	\$0		\$12,862
Erie	Wattsburg Area SD	38	11	29%	1	\$7,138	\$0		\$19,293
Fayette	Albert Gallatin Area SD	56	13	23%	22	\$7,051	\$1,170	\$8,912	\$17,133
Fayette	Brownsville Area SD	46	16	35%	21	\$8,105	\$156	\$13;388	\$21,649
Fayette	Connellsville Area SD	127	39	31%		\$19,840	\$3,042	\$25,737	\$48,618
Fayette	Frazier SD	18	4	22%		\$1,983	\$0	\$3,376	\$5,359
Fayette	Laurel Highlands SD	75	18	24%		\$8,861	\$1,014		\$22,280
Fayette	Uniontown Area SD	43	17	40%		\$8,637	\$1,170	\$11,613	\$21,420
Forest	Forest Area SD	33	5	15%	1	\$1,983	\$0	\$3,376	\$5,359
Franklin	Chambersburg Area SD	210	33	16%		\$16,396	\$1,014		\$42,645
Franklin	Fannett-Metal SD	10	3	30%		\$1,983	\$0		\$5,359
Franklin	Greencastle-Antrim SD	65	8	12%	10	\$3,743	\$156	\$5,960	\$9,859

Franklin Tuscarora SD	64	7	11%	11	\$3,804	\$390	\$5,447	\$9,641
Franklin Waynesboro Area SD	62	10	16%	10	\$3,966	\$0	\$6,753	\$10,718
Fulton Forbes Road SD	9	2	22%	3	\$1,190	\$0	\$2,026	\$3,215
Fulton Southern Fulton SD	7	1	14%	1	\$397	\$0	\$675	\$1,072
Greene Carmichaels Area SD	22	9	41%	11	\$3,916	\$312	\$5,843	\$10,071
Greene Central Greene SD	36	10	28%	23	\$7,113	\$1,404	\$8,398	\$16,915
Greene Jefferson-Morgan SD	15	6	40%	9	\$2,900	\$468	\$3,700	\$7,067
Greene Southeastern Greene SD	5	3	60%	3	\$1,190	\$0	\$2,026	\$3,215
Greene West Greene SD	4	2	50%	4	\$1,140	\$312	\$1,116	\$2,568
Huntingdon Huntingdon Area SD	37	7	19%	7	\$2,553	\$156	\$3,934	\$6,643
Huntingdon Juniata Valley SD	10	2	20%	3	\$967	\$156	\$1,233	\$2,356
Huntingdon Mount Union Area SD	. 21	3	14%	3	\$1,190	\$0	\$2,026	\$3,215
Huntingdon SOUTHERN HUNTINGDO	N C 32	4	13%	6	\$2,156	\$156	\$3,259	\$5,571
Indiana Blairsville-Saltsburg SD	85	16	19%	24	\$7,956	\$1,092	\$10,659	\$19,706
Indiana Homer-Center SD	51	12	24%	17	\$5,738	\$702	\$7,913	\$14,353
Indiana Indiana Area SD	233	28	12%	42	\$15,094	\$1,092	\$22,813	\$38,999
Indiana Marion Center Area SD	68	9	13%	13	\$4,709	\$312	\$7,193	\$12,214
Indiana Penns Manor Area SD	53	11	21%	12	\$4,759	\$0	\$8,103	\$12,862
Indiana Purchase Line SD	59	9	15%	. 19	\$7,200	\$234	\$11,641	\$19,075
Indiana United SD	62	7	11%	10	\$3,185	\$546	\$3,979	\$7,709
Jefferson Brockway Area SD	39	7	18%	9	\$3,569	\$0	\$6,077	\$9,646
Jefferson Brookville Area SD	79	13	16%	17	\$6,630	\$78	\$11,083	\$17,791
Jefferson County-DuBois A		2	50%	. 4	\$1,586	\$0	\$2,701	\$4,287
Jefferson Punxsutawney Area SD	106	19	18%	22	\$8,725	\$0	\$14,856	\$23,580
Juniata Juniata County SD	96	26	27%	47	\$14,176	\$3,120	\$15,887	\$33,183
Lackawanna Abington Heights SD	71	6	8%	6	\$2,268	\$78	\$3,655	\$6,001
Lackawanna Carbondale Area SD	31	5	16%	11	\$3,916	\$312	\$5,843	\$10,071
Lackawanna Dunmore SD	26	7	27%	8	\$3,173	\$0	\$5,402	\$8,575
Lackawanna Lakeland SD	43	6	14%	8	\$2,615	\$390	\$3,421	\$6,425
Lackawanna Mid Valley SD	14	2	14%	4	\$1,252	\$234	\$1,512	\$2,998
Lackawanna North Pocono SD	45	3	7%	3	\$967	\$156	\$1,233	\$2,356
Lackawanna Old Forge SD	25	7	28%	9	\$3,123	\$312	\$4,492	\$7,927
Lackawanna Riverside SD	26	9	35%	16	\$4,783	\$1,092	\$5,257	\$11,132
Lackawanna Scranton SD	83	18	22%	35	\$10,644	\$2,262	\$12,143	\$25,049
Lackawanna Valley View SD	40	10	25%	15	\$5,726	\$156	\$9,336	\$15,218
Lancaster Cocalico SD	143	60	42%	102	\$29,963	\$7,332	\$31,628	\$68,923
Lancaster Columbia Borough SD	31	13	42%	22	\$6,493	\$1,560	\$6,931	\$14,984

Lancaster	Conestoga Valley SD	191	66	35%	140	\$40,346	\$10,608	\$40,645	\$91,599
Lancaster	Donegal SD	94	39	41%	73	\$21,698	\$5,070	\$23,537	\$50,305
Lancaster	Eastern Lancaster County SD	129	37	29%	60	\$17,769	\$4,212	\$19,118	\$41,099
Lancaster	Elizabethtown Area SD	149	47	32%	84	\$24,721	\$6,006	\$26,210	\$56,937
Lancaster	Ephrata Area SD	146	45	31%	86	\$24,845	\$6,474	\$25,183	\$56,501
Lancaster	Hempfield SD	358	102	28%	208	\$61,065	\$14,976	\$64,372	\$140,413
Lancaster	Lampeter-Strasburg SD	147	32	22%	64	\$18,909	\$4,524	\$20,234	\$43,667
Lancaster	Lancaster SD	257	133	52%	260	\$80,460	\$15,834	\$95,127	\$191,420
Lancaster	Manheim Central SD	111	36	32%	61	\$18,501	\$3,978	\$20,982	\$43,460
Lancaster	Manheim Township SD	202	59	29%	107	\$31,946	\$7,332	\$35,004	\$74,282
Lancaster	Penn Manor SD	280	64	23%	119	\$34,808	\$8,658	\$36,371	\$79,837
Lancaster	Pequea Valley SD	74	26	35%	35	\$10,533	\$2,340	\$11,746	\$24,619
Lancaster	Solanco SD	128	47	37%	84	\$25,279	\$5,616	\$28,191	\$59,086
Lancaster	Warwick SD	166	42	25%	73	\$21,363	\$5,304	\$22,348	\$49,015
Lawrence	Ellwood City Area SD	97	24	25%	45	\$14,052	\$2,652	\$16,914	\$33,618
Lawrence	Laurel SD	56	12	21%	18	\$5,465	\$1,170	\$6,211	\$12,845
Lawrence	Lawrence County CTC	4	1	25%	1	\$397	\$0	\$675	\$1,072
Lawrence	Mohawk Area SD	66	12	18%	15	\$4,610	\$936	\$5,374	\$10,919
Lawrence	Neshannock Township SD	56	16	29%	22	\$7,609	\$780	\$10,893	\$19,282
Lawrence	New Castle Area SD	101	40	40%	72	\$22,194	\$4,446	\$26,032	\$52,671
Lawrence	Shenango Area SD	56	20	36%	26	\$7,633	\$1,872	\$8,047	\$17,552
Lawrence	Union Area SD	17	15	88%	30	\$8,550	\$2,340	\$8,370	\$19,260
Lawrence	Wilmington Area SD	34	3	9%	4	\$1,252	\$234	\$1,512	\$2,998
Lebanon	Annville-Cleona SD	87	24	28%	33	\$9,740	\$2,340	\$10,396	\$22,475
Lebanon	Cornwall-Lebanon SD	192	67	35%	126	\$37,472	\$8,736	\$40,702	\$86,910
Lebanon	Eastern Lebanon County SD	97	28	29%	48	\$14,015	\$3,510		\$32,105
Lebanon	Lebanon SD	65	27	42%	58	\$16,530		\$16,182	\$37,236
Lebanon	Northern Lebanon SD	83	35	42%	62	\$17,782	\$4,758	\$17,694	\$40,234
Lebanon	Palmyra Area SD	112	35	31%	56	\$16,741	\$3,822	\$18,398	\$38,961
Lehigh	Allentown City SD	491	238	48%	529	\$152,216	\$40,248	\$152,742	\$345,206
Lehigh	Catasauqua Area SD	90	24	27%	37	\$10,768	\$2,730	\$11,116	\$24,614
Lehigh	East Penn SD	428	116	27%	202	\$58,909	\$14,820	\$61,113	\$134,842
Lehigh	Northern Lehigh SD	101	27	27%	46	\$13,110		\$12,834	\$29,532
Lehigh	Northwestern Lehigh SD	145	41	28%	76	\$21,995	\$5,694	\$22,393	\$50,081
Lehigh	Parkland SD	504	131	26%	237	\$70,111	\$16,692	\$75,237	\$162,040
Lehigh	Salisbury Township SD	112	19	17%	32	\$9,678	\$2,106	\$10,909	\$22,693
Lehigh	Southern Lehigh SD	138	27	20%	43	\$12,478	\$3,198	\$12,790	\$28,466

Lehigh	Whitehall-Coplay SD	241	81	34%	161	\$46,889	\$11,856	\$48,485	\$107,230
Lehigh	Roberto Clemente Charter Sch	1	1	100%	2	40,0	\$156	\$558	\$1,284
Luzerne	Crestwood SD	156	30	19%	50	\$15,031	\$3,354	\$16,724	\$35,109
Luzerne	Dallas SD	94	22	23%	36	\$10,929	\$2,340	\$12,422	\$25,691
Luzerne	Greater Nanticoke Area SD	125	37	30%	69	\$19,665	\$5,382	\$19,251	\$44,298
Luzerne	Hanover Area SD	100	28	28%	49	\$14,411	\$3,510	\$15,256	\$33,177
Luzerne	Hazleton Area SD	387	83	21%	144	\$43,272	\$9,672	\$48,101	\$101,045
Luzerne	Lake-Lehman SD	93	22	24%	36	\$10,595	\$2,574	\$11,233	\$24,401
Luzerne	Northwest Area SD	. 82	23	28%	44	\$12,763	\$3,276	\$13,069	\$29,108
Luzerne	Pittston Area SD	141	30	21%	52	\$15,601	\$3,510	\$17,282	\$36,393
Luzerne	Wilkes-Barre Area SD	325	106	33%	229	\$68,166	\$15,834	\$74,194	\$158,194
Luzerne	Wyoming Area SD	99	37	37%	65	\$19,194	\$4,602	\$20,513	\$44,309
Luzerne	Wyoming Valley West SD	209	66	32%	135	\$39,144	\$10,062	\$40,043	\$89,249
Lycoming	East Lycoming SD	42	3	7%	5	\$1,983	\$0	\$3,376	\$5,359
Lycoming	Jersey Shore Area SD	88	6	7%	9	\$3,569	\$0	\$6,077	\$9,646
Lycoming	Loyalsock Township SD	44	2	- 5%	4	\$1,586	\$0	\$2,701	\$4,287
Lycoming	Montgomery Area SD	23	4	17%	8	\$2,726	\$312	\$3,817	\$6,855
Lycoming	Montoursville Area SD	61	4	7%	4	\$1,586	\$0	\$2,701	\$4,287
Lycoming	Muncy SD	27	2	7%	2	\$793	\$0	\$1,351	\$2,144
Lycoming	South Williamsport Area SD	36	1	3%	1	\$397	\$0	\$675	\$1,072
Lycoming	Williamsport Area SD	87	24	28%	46	\$18,243	\$0	\$31,062	\$49,304
McKean	Bradford Area SD	42	8	19%	9	\$3,569	\$0	\$6,077	\$9,646
McKean	Kane Area SD	21	5	24%	6	\$2,379	\$0	\$4,052	\$6,431
McKean	Otto-Eldred SD	16	3	19%	3	\$1,190	\$0	\$2,026	\$3,215
McKean	Port Allegany SD	15	4	27%	5	\$1,983	\$0	\$3,376	\$5,359
McKean	Smethport Area SD	20	3	15%	3	\$1,190	\$0	\$2,026	\$3,215
Mercer	Commodore Perry SD	22	3	14%	4	\$1,252	\$234	\$1,512	\$2,998
Mercer	Farrell Area SD	18	. 5	28%	11	\$3,693	\$468	\$5,050	\$9,211
Mercer	Greenville Area SD	58	9	16%	17	\$5,849	\$624	\$8,309	\$14,782
Mercer	Grove City Area SD	95	22	23%	37	\$11,103	\$2,496	\$12,304	\$25,903
Mercer	Hermitage SD	70	11	16%	16	\$5,676	\$468	\$8,427	\$14,570
Mercer	KEYSTONE ED CTR CS	2	1	50%	2	\$793	\$0	\$1,351	\$2,144
Mercer	Lakeview SD	48	9	19%	11	\$4,028	\$234	\$6,239	\$10,501
Mercer	Mercer Area SD	33	3	9%	4	\$1,252	\$234	\$1,512	\$2,998
Mercer	Reynolds SD	37	6	16%	8	\$2,949	\$156	\$4,610	\$7,715
Mercer	Sharon City SD	30	11	37%	15	\$5,726	\$156	\$9,336	\$15,218
Mercer	Sharpsville Area SD	34	9	26%	10	\$3,854	\$78	\$6,356	\$10,288

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	est Middlesex Area SD	50	13	26%	16	\$5,899	\$312	\$9,219	\$15,43
	fflin County SD	153	25	16%	38	\$11,723	\$2,340	\$13,772	\$27,83
Monroe Ea	st Stroudsburg Area SD	387	109	28%	180	\$54,871	\$11,544	\$62,900	\$129,31
	easant Valley SD	370	94	25%	134	\$40,756	\$8,658	\$46,500	\$95,91
Monroe Po	cono Mountain SD	557	143	26%	217	\$65,973	\$14,040	\$75,204	\$155,21
	oudsburg Area SD	269	52	19%	76	\$22,776	\$5,148	\$25,167	\$53,09
	ergreen Community School	3		33%	1	\$285	\$78	\$279	\$64
	cono Mountain Charter Scho	2	1	50%	1	\$285	\$78	\$279	\$6
	ington SD	319	140	44%	243	\$72,044	\$17,004	\$77,703	\$166,75
Montgomery Ac	hievement House CS	6		33%	2	\$682	\$78	\$954	\$1,7
Montgomery Ch	eltenham Township SD	180	85	47%	150	\$44,647	\$10,374	\$48,586	\$103,60
Montgomery Co	lonial SD	176	98	56%	182	\$52,986	\$13,416	\$54,741	\$121,14
Montgomery Ha	tboro-Horsham SD	262	93	35%	151	\$45,378	\$10,140	\$50,450	\$105,96
Montgomery Jer	nkintown SD	23	7	30%	. 9	\$2,788	\$546	\$3,304	\$6,63
	wer Merion SD	81	32	40%	68	\$19,826	\$4,992	\$20,557	\$45,3
Montgomery Lov	wer Moreland Township SD	37	21	57%	36	\$10,929	\$2,340	\$12,422	\$25,69
	ethacton SD	220	62	28%	115	\$33,333	\$8,580	\$34,066	\$75,9
Montgomery No	orristown Area SD	206	113	55%	258	\$76,989	\$17,706	\$84,266	\$178,90
Montgomery No	orth Penn SD	772	302	39%	545	\$158,896	\$40,014	\$164,735	\$363,64
Montgomery Pe	rkiomen Valley SD	225	75	33%	129	\$37,546	\$9,516	\$38,765	\$85,8
Montgomery Po	ttsgrove SD	133	46	35%	83	\$24,882	\$5,616	\$27,516	\$58,0
	ttstown SD	82	36	44%	63	\$18,067	\$4,836	\$17,973	\$40,8
Montgomery So	uderton Area SD	348	134	39%	251	\$73,990	\$17,862	\$78,747	\$170,5
Montgomery Sp	ringfield Township SD	99	49	49%	83	\$24,548	\$5,850	\$26,327	\$56,7
Montgomery Sp	ring-Ford Area SD	267	92	34%	177	\$51,561	\$13,026	\$53,346	\$117,93
	per Dublin SD	157	58	37%	111	\$33,420	\$7,410	\$37,309	\$78,1
Montgomery Up	per Merion Area SD	150	71	47%	142	\$41,586	\$10,296	\$43,581	\$95,4
Montgomery Up	per Moreland Township SD	139	60	43%	103	\$30,024	\$7,566	\$31,115	\$68,70
Montgomery Up	per Perkiomen SD	118	40	34%	74	\$21,425	\$5,538	\$21,835	\$48,7
Montgomery Wi	ssahickon SD	197	77	39%	148	\$43,407	\$10,686	\$45,651	\$99,74
	anville Area SD	91	16	18%	32	\$11,352	\$936	\$16,853	\$29,1
Northampton Le	high Valley CHS for Perform	4	1	25%	1	\$397	\$0	\$675	\$1,0
	Ison Area SD	139	24	17%	33	\$9,851	\$2,262	\$10,792	\$22,9
	ingor Area SD	219	33	15%	52	\$15,378	\$3,666	\$16,489	\$35,5
	thlehem Area SD	804	202	25%	330	\$97,955	\$23,010	\$105,939	\$226,9
Northhampton Ea	ston Area SD	453	115	25%	171	\$50,967	\$11,778	\$55,634	\$118,37
Northhampton Na	zareth Area SD	352	50	14%	76	\$23,111	\$4,914	\$26,355	\$54,38

Northhampton	Northampton Area SD	366	62	17%	99	\$28,884	\$7,254	\$29,999	\$66,137
	Pen Argyl Area SD	112	22	20%	37	\$11,326		\$13,097	\$26,763
Northhampton	Saucon Valley SD	149	26	17%	38	\$11,723	\$2,340	\$13,772	\$27,835
	Line Mountain SD	37	7	19%	16	\$5,006		\$6,049	\$11,991
Northumberland	Milton Area SD	53	15	28%	26	\$9,865	\$312	\$15,972	\$26,148
Northumberland	Mount Carmel Area SD	98	. 21	21%	26	\$9,084	\$858	\$13,198	\$23,139
	Shamokin Area SD	85	16	19%	24	\$7,844	\$1,170	\$10,262	\$19,276
Northumberland	Shikellamy SD	103	16	16%	26	\$9,307	\$702	\$13,990	\$23,999
Northumberland	Warrior Run SD	50	10	20%	14	\$4,994	\$390	\$7,472	\$12,856
Perry	Greenwood SD	41	8	20%	17	\$5,068	\$1,170	\$5,536	\$11,774
Perry	Newport SD	57	25	44%	50	\$14,473		\$14,743	\$32,960
Perry	Susquenita SD	85	30	35%	52	\$14,932	\$3,978	\$14,904	\$33,814
Perry	West Perry SD	134	. 49	37%	79	\$22,627	\$6,084	\$22,437	\$51,148
Philadelphia	Architecture and Design CHS	11	8	73%	16	\$6,345	\$0	\$10,804	\$17,149
Philadelphia	Delaware Valley CHS	58	37	64%	64	\$19,691	\$3,978	\$23,007	\$46,676
Philadelphia	Franklin Towne CHS	75	36	48%	64	\$18,463	\$4,836	\$18,649	\$41,948
Philadelphia	Freire CS	33	13	39%	25	\$7,906	\$1,404	\$9,749	\$19,059
Philadelphia	Hope CS	22	16		33	\$10,409	\$1,872	\$12,773	\$25,054
Philadelphia	Imhotep Institute CHS	36	20		41			\$16,194	\$31,480
Philadelphia	Mastery Charter High School	8	4	50%	9	\$3,569	\$0	\$6,077	\$9,646
Philadelphia	Multi-Cultural Academy CS	16	11	69%	22		\$1,170		\$17,133
Philadelphia	Nueva Esperanza Academy CS		12	67%	22		\$1,482	\$7,327	\$15,413
Philadelphia	PHILADELPHIA ACAD CS	16	12	75%	18	\$5,465	\$1,170	\$6,211	\$12,845
Philadelphia	Philadelphia AVTS	157	85	54%	172	\$68,211	\$0	\$116,144	\$184,355
Philadelphia	Philadelphia City SD	3,354	1,909	57%	3,579	\$1,091,983	\$228,852	\$1,254,125	\$2,574,960
Philadelphia	Philadelphia Electrical & Tech	34	23		40			\$13,141	\$27,829
Philadelphia	Preparatory CS	62	18		34		\$2,496	\$10,279	\$22,688
Philadelphia	WORLD COMMUNICATIONS	21	10		15			\$5,374	\$10,919
Philadelphia	Youth Build Phila CS	14	11	79%	26	\$7,522	\$1,950	\$7,650	\$17,122
Philadelphia	Mariana Bracetti Acad Charter	15	13	87%	26			\$7,254	\$16,692
Philadelphia	Math Civics & Sciences Charte		1	50%	1	Ψ=00		\$279	\$642
Pike	Delaware Valley SD	125	27	22%	47	\$15,403	\$2,262	\$20,246	\$37,911
Potter	Austin Area SD	8	1	13%	1	\$397	\$0	\$675	\$1,072
Potter	Coudersport Area SD	16	4	25%	6	\$2,379	\$0	\$4,052	\$6,431
Schuylkill	Blue Mountain SD	82	18	22%	28	\$8,538	\$1,794	\$9,793	\$20,125
Schuylkill	Mahanoy Area SD	57	13	23%	25	\$7,460	\$1,716	\$8,164	\$17,339
Schuylkill	Minersville Area SD	30	10	33%	14	\$4,659	\$624	\$6,284	\$11,567

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Schuylkill No	orth Schuylkill SD	58	15	26%	18	\$5,799	\$936	\$7,400	\$14,135
Schuylkill Pir	ne Grove Area SD	46	15	33%	25	\$7,348	\$1,794	\$7,768	\$16,910
Schuylkill Po	ottsville Area SD	102	23	23%	32	\$10,459	\$1,560	\$13,683	\$25,702
Schuylkill Sc	chuylkill Haven Area SD	8	6	75%	11	\$3,135	\$858	\$3,069	\$7,062
Schuylkill Sh	nenandoah Valley SD	33	13	39%	21	\$7,436	\$624	\$11,010	\$19,070
Schuylkill Ta	maqua Area SD	145	51	35%	102	\$29,405	\$7,722	\$29,647	\$66,773
Schuylkill Tri	i-Valley SD	35	2	6%	2	\$793	\$0	\$1,351	\$2,144
Schuylkill Wi	illiams Valley SD	32	11	34%	. 17	\$4,957	\$1,248	\$5,139	\$11,344
Snyder Mi	dd-West SD	34	4	12%	6	\$2,045	\$234	\$2,863	\$5,141
Snyder Se	elinsgrove Area SD	85	21	25%	29	\$9,604	\$1,326	\$12,846	\$23,776
Somerset Be	erlin Brothersvalley SD	13	3.	23%	3	\$1,190	\$0	\$2,026	\$3,215
Somerset Co	onemaugh Township Area SI	65	6	9%	9	\$3,011	\$390	\$4,096	\$7,497
Somerset No	orth Star SD	34	5	15%	5	\$1,648	\$234	\$2,188	\$4,070
Somerset Ro	ockwood Area SD	10	3	30%	3	\$1,190	\$0	\$2,026	\$3,215
Somerset Sh	nade-Central City SD	21	2	10%	2	\$682	\$78	\$954	\$1,714
Somerset Sc	omerset Area SD	49	4	8%	4	\$1,475	\$78	\$2,305	\$3,857
Somerset Tu	rkeyfoot Valley Area SD	8	1	13%	1	\$397	\$0	\$675	\$1,072
Somerset W	indber Area SD	79	12	15%	17	\$5,180	\$1,092	\$5,932	\$12,203
	ıllivan County SD	6	2	33%	3	\$967	\$156	\$1,233	\$2,356
	ue Ridge SD	29	5	17%	6	\$2,156	\$156	\$3,259	\$5,571
Susquehanna Ell	k Lake SD	20	3	15%	6	\$1,822	\$390	\$2,070	\$4,282
Susquehanna Fo	orest City Regional SD	19	4	21%	5	\$1,983	\$0	\$3,376	\$5,359
1	ontrose Area SD	20	2	10%	3	\$1,190	\$0	\$2,026	\$3,215
Susquehanna Mo	ountain View SD	19	5	26%	6	\$1,822	\$390	\$2,070	\$4,282
Susquehanna Su	usquehanna Community SD	33	5	15%	7	\$2,776	\$0	\$4,727	\$7,503
Tioga No	orthern Tioga SD	30	4	13%	5	\$1,983	\$0	\$3,376	\$5,359
Tioga Sc	outhern Tioga SD	37	5	14%	9	\$3,569	\$0	\$6,077	\$9,646
Tioga W	ellsboro Area SD	19	3	16%	4	\$1,586	\$0	\$2,701	\$4,287
Union Le	ewisburg Area SD	46	3	7%	4	\$1,363	\$156	\$1,909	\$3,428
Union Mi	ifflinburg Area SD	39	6	15%	9	\$3,011	\$390	\$4,096	\$7,497
Venango Cr	ranberry Area SD	56	12	21%	17	\$6,407	\$234	\$10,291	\$16,932
	anklin Area SD	80	15	19%	18	\$6,804	\$234	\$10,966	\$18,003
	il City Area SD	108	18	17%	22	\$8,725	\$0	\$14,856	\$23,580
	tusville Area SD	73	13	18%	14	\$5,441	\$78	\$9,057	\$14,576
	alley Grove SD	23	1	4%	1	\$397	\$0	\$675	\$1,072
	arren County SD	106	18	17%	22	\$8,725	\$0	\$14,856	\$23,580
Washington Av	vella Area SD	18	8	44%	15	\$4,833	\$780	\$6,166	\$11,779

Washington	Bentworth SD	34	13	38%	26	\$7,856	\$1,716	\$8,839	\$18,411
Washington	Bethlehem-Center SD	57	21	37%	42	\$12,639	\$2,808	\$14,096	\$29,543
Washington	Burgettstown Area SD	38	13	34%	26	\$7,745	\$1,794	\$8,443	\$17,981
Washington	California Area SD	43	12	28%	25	\$7,348	\$1,794	\$7,768	\$16,910
Washington	Canon-McMillan SD	151	42	28%	64	\$20,360	\$3,510	\$25,385	\$49,255
Washington	Charleroi SD	51	25	49%	47	\$14,399	\$2,964	\$16,679	\$34,042
Washington	Chartiers-Houston SD	33	10	30%	17	\$5,514	\$858	\$7,121	\$13,493
Washington	Fort Cherry SD	50	16	32%	23	\$7,336	\$1,248	\$9,191	\$17,775
Washington	McGuffey SD	53	22	42%	41	\$12,243	\$2,808	\$13,420	\$28,471
Washington	Peters Township SD	128	34	27%	69	\$21,897	\$3,822	\$27,176	\$52,895
Washington	Ringgold SD	135	68	50%	150	\$44,535	\$10,452	\$48,190	\$103,177
Washington	Trinity Area SD	118	21	18%	32	\$10,347	\$1,638	\$13,287	\$25,272
Washington	Washington SD	52	17	33%	37	\$11,326	\$2,340	\$13,097	\$26,763
Wayne	Wallenpaupack Area SD	85	15	18%	22	\$7,051	\$1,170	\$8,912	\$17,133
Wayne	Wayne Highlands SD	80	8	10%	13	\$3,817	\$936	\$4,023	\$8,776
Wayne	Western Wayne SD	21	5	24%	6	\$2,156	\$156	\$3,259	\$5,571
Westmoreland	Belle Vernon Area SD	123	40	33%	66	\$20,818	\$3,744	\$25,547	\$50,109
Westmoreland	Burrell SD	91	15	16%	20	\$6,927	\$702	\$9,939	\$17,568
Westmoreland	Derry Area SD	101	18	18%	35	\$10,421	\$2,418	\$11,350	\$24,189
Westmoreland	Franklin Regional SD	156	38	24%	69	\$21,785	\$3,900	\$26,780	\$52,465
Westmoreland	Greater Latrobe SD	155	35	23%	59	\$17,596	\$4,056	\$19,235	\$40,887
Westmoreland	Greensburg Salem SD	130	23	18%	39	\$11,561	\$2,730	\$12,466	\$26,757
Westmoreland	Hempfield Area SD	302	73	24%	130	\$38,389	\$9,204	\$41,025	\$88,618
Westmoreland	Jeannette City SD	43	20	47%	51	\$14,535	\$3,978	\$14,229	\$32,742
Westmoreland	Kiski Area SD	176	29	16%	52	\$16,940	\$2,574	\$22,037	\$41,551
Westmoreland	Ligonier Valley SD	57	12	21%	20	\$6,146	\$1,248	\$7,165	\$14,559
Westmoreland	Monessen City SD	36	10	28%	15	\$4,944	\$702	\$6,563	\$12,209
Westmoreland	Mount Pleasant Area SD	84	26	31%	44	\$13,321	\$2,886	\$15,050	\$31,257
Westmoreland	New Kensington-Arnold SD	66	19	29%	35	\$11,649	\$1,560	\$15,709	\$28,917
Westmoreland	Norwin SD	210	39	19%	66	\$19,926	\$4,368	\$22,377	\$46,670
Westmoreland	Penn-Trafford SD	226	46	20%	79	\$23,519	\$5,460	\$25,607	\$54,586
Westmoreland	Southmoreland SD	91	21	23%	36	\$10,372	\$2,730	\$10,440	\$23,542
Westmoreland	Yough SD	85	23	27%	33	\$10,409	\$1,872	\$12,773	\$25,054
Wyoming	Lackawanna Trail SD	26	2	8%	2	\$793	\$0	\$1,351	\$2,144
Wyoming	Tunkhannock Area SD	48	7	15%	8	\$2,615	\$390	\$3,421	\$6,425
York	Central York SD	182	54	30%	103	\$31,140	\$6,786	\$35,077	\$73,003
York	Dallastown Area SD	165	43	26%	89	\$26,481	\$6,162	\$28,794	\$61,436

.

York	Dover Area SD	109	31	28%	55	\$16,121	\$3,978	\$16,930	\$37,029
York	Eastern York SD	67	25	37%	50	\$14,473	\$3,744	\$14,743	\$32,960
York	Hanover Public SD	22	13	59%	26	\$7,410	\$2,028	\$7,254	\$16,692
York	Northeastern York SD	81	25	31%	53	\$15,217	\$4,056	\$15,183	\$34,456
York	Northern York County SD	124	44	35%	74	\$21,983	\$5,148	\$23,816	\$50,947
York	Red Lion Area SD	161	47	29%	98	\$28,934	\$6,942	\$30,908	\$66,784
York	South Eastern SD	79	27	34%	36	\$11,264	\$2,106	\$13,610	\$26,980
York	South Western SD	142	46	32%	88	\$26,196	\$6,084	\$28,515	\$60,794
York	Southern York County SD	92	36	39%	67	\$19,653	\$4,836	\$20,674	\$45,163
York	Spring Grove Area SD	109	35	32%	61	\$17,831	\$4,446	\$18,604	\$40,881
York	West Shore SD	404	151	37%	253	\$73,890	\$18,486	\$76,927	\$169,303
York	West York Area SD	95	32	34%	53	\$17,002	\$2,808	\$21,523	\$41,333
York	York City SD	56	30	54%	60	\$17,993	\$4,056	\$19,910	\$41,959
York	York Co School of Technology	6	1	17%	1	\$397	\$0	\$675	\$1,072
York	York Suburban SD	88	27	31%	43	\$13,482	\$2,496	\$16,356	\$32,334
York	Crispus Attucks Charter Schoo	5	5	100%	10	\$2,850	\$780	\$2,790	\$6,420
Statewide Total		62,002	20,394	33%	37,312	\$11,265,676	\$2,468,700	\$12,653,642	

Local Assessment Validity Study Report February 2009 Executive Summary

Rayne A. Sperling, PhD Associate Professor of Education Jonna M. Kulikowich, PhD Professor of Education

The Penn State Research Team



Introduction

Pennsylvania's State Board of Education regulations require every school district to have a local assessment system that can serve as an alternative high school graduation requirement for students who do not pass the 11th grade administration (or 12th grade retest) of the Pennsylvania System of School Assessment (PSSA). In 2007, more than 56,000 students statewide graduated based on these district-level determinations of proficiency.¹

This study documents considerable variance in the type and form of these local assessments as well as the manner in which these assessments are used as graduation requirements. In addition, the study reports ratings by panels of Pennsylvania educators that raise questions about the quality of local assessments used for graduation purposes statewide. Based on criteria established by the panels, evidence of alignment to standards and practices that could result in valid measures of proficiency was present from 5 percent of those school districts that submitted local assessments.

While the Penn State Research Team conducted this study at the request of the Secretary of Education, his staff had no role in reviewing or rating the assessments.

Survey of Local Assessments

Approximately 85 percent of school districts statewide responded to the Secretary of Education's July 28 and August 12, 2008 written requests for copies of local assessments used as graduation requirements in Mathematics and Reading; 418 districts submitted assessments by the deadline. The rate of response was roughly equal across rural, suburban, and urban districts.

In cataloguing the materials, considerable variance in the type and format of assessments used to inform local graduation decisions was noted. This variance included, for example, that some districts submitted a letter and others submitted various materials, in some cases multiple binders or boxes of materials, to represent their local assessment. Some districts reported that they did not have a local assessment. Others noted that proficiency on their local assessment was not a requirement for graduation purposes. Many districts reported that their curriculum was aligned to standards, and, as such, if students passed their coursework their performance in Mathematics and Reading was deemed proficient. Other districts reported use of attendance or citizenship as measures of proficiency.

¹ Pennsylvania Partnerships for Children, 2008

Many districts submitted commercially-developed assessments or assessments developed by Intermediate Units or other states. In all, districts submitted more than 60 different such assessments. Some examples of these types of assessments include the 4Sight Benchmark Assessments, tests developed to assess vocational skills, college entrance exams, and test preparation materials such as PSSA Coach.

Further, some districts reported the use of district-developed tests. In addition, as noted, many districts use course grades, portfolios, completion of a culminating project, or remedial programs—or some combination of these sometimes coupled with commercially available materials—as the local assessment. Whatever each district sent was used to create a folder that represented the local assessment for that district. Therefore, the local assessment folder might not have been an individual test, or any test at all, but might include a collection of tests from several courses or some combination of tests and other materials.

Ratings by Panels & Penn State Team

For purposes of this study, validity of a district's assessment system was evaluated based on two factors: *Alignment* (do the assessment materials adequately measure 11th grade proficiency standards for Mathematics and Reading?) and *Practice* (how the district reports that the assessment is administered and how the results are used to determine proficiency). Given these rating systems, a local assessment could be considered as aligned but the practice reported might not be considered a valid means for determining proficiency. As an example, released PSSA items may be aligned to state academic standards; however, panelists concluded that the administration of previously-used test items may not be a valid practice to ensure proficiency.

Step 1 – Alignment

Eight panels comprised of public educators from across Pennsylvania reviewed all local assessment folders of materials submitted by the deadline in a process facilitated by the Penn State Research Team and national content experts. Educators reviewed assessments in their area of specialty (e.g., Mathematics teachers or curriculum coordinators only reviewed Mathematics assessments) and assigned ratings based on the rubric below.

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Panelists assigned each district folder a rating on the above 0-3 scale based on the degree of connection between the assessment and 11th grade state proficiency standards in Mathematics and Reading. For this judgment of alignment, a district's folder could earn a rating of 3 as long as every standard area was represented by at least one item across the range of submitted materials. Given the rating systems, a district's folder of assessment materials could be rated a score of '3' even if there were no practices reported that would indicate an individual student completed all items of the assessment. While more than 300 Mathematics assessments received a rating of 3, just 100 Reading assessments received scores of 3 by the Pennsylvania expert panelists.

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The panels also established criteria for rating the manner in which local assessments are administered and how results are used in graduation decisions. To establish these criteria, the panels employed the use of a four-point scale, as found below, based on key factors such as test security, retake procedures and exposure (e.g., could students be assessed more than once based on the same items?), and the weight assigned to the local assessment for graduation decisions.

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Based on information submitted by districts and determinations made by the expert panels, fewer than 9 percent of Mathematics practices and 6 percent of Reading practices represent a valid system of procedures to determine proficiency (a rating of 3). Nearly half of all district practices (180) received ratings of 0 for both Mathematics and Reading. A 0 rating represents a practice as reported that cannot ensure students have met proficiency. Examples of practices that would have received ratings of 0 include summer course attendance after graduation, remedial course attendance without explanation of how grades are assigned, courses without an objective measure or portfolios with no standard rubric system, and tests not aligned to proficiency standards for performance in Mathematics or in Reading.

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Alignment: Mathematics by Reading Alignment Overall (n = 378, 90.4% of reporting districts)

Reading→. Mathematics ↓	No Alignment	Some Alignment	Most Aligned	All Aligned
No Alignment	6 (.016)	0 (.000)	0 (.000)	0 (.000)
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Introduction

In this report for the Local Assessment Validity study, we outline procedures conducted to store information in a research database about local assessments submitted to the Pennsylvania Department of Education (PDE) by school districts of the Commonwealth. Further, we provide initial descriptions of the assessment materials delivered by school districts in Pennsylvania based on the information stored in the research database.

This study is designed to examine the local assessments used by districts throughout the Commonwealth of Pennsylvania to measure proficiency of the academic standards in Mathematics and Reading at the secondary level. Pennsylvania Chapter 4 regulation states that "Students shall demonstrate proficiency in reading, writing and mathematics on either the State assessments administered in grade 11 or 12 or local assessment aligned with academic standards and State assessments under § 4.52 (relating to local assessment system) at the proficient level or better to graduate."

This regulation guides our research. Our primary purpose is to describe the characteristics of the local assessments used by the individual districts. Appendix A provides the names and titles of the members of The Penn State Research Team.

To best describe the characteristics and nature of the local assessments, we formatted this report to include three major sections. Each section includes procedures, data sources, and findings, which we present descriptively. The first section describes characteristics of the districts that did and did not submit local assessment information. This section starts with the overall data collection procedure and documents team recording procedures and data sources. The second section describes the nature of the materials submitted by the districts based upon district characteristics. The third section describes the procedures employed and data collected to explore the degree to which materials and practices submitted by districts corresponded with the State proficiency standards.

In response to a request by the PDE sent to the districts via Penn Link Monday, July 28, 2008 and again Tuesday, August 12, 2008, districts provided the local assessments that they use to measure academic proficiency in Mathematics and Reading for those students who do not score proficient on the 11th grade administration of the PSSA or on the 12th grade retake of the exam. Under § 4.52, each district is to determine the characteristics of its individual local assessments. These local assessments might include a test, portfolio, curriculum materials, or other means. Regardless of the nature of the local assessment, each district is to have a local assessment practice that can measure proficiency on the academic standards for students whose performance is not deemed proficient through the PSSA testing. The purpose of the Local Assessment Validity Study was to describe the materials submitted as the local assessments by the districts. Additionally, we summarize information the districts provided about the types of practices they use to meet the proficiency requirements.

Section I: District Characteristics for Reporting and Non-Reporting Districts

In response to the Penn Link request, approximately 85% of districts submitted materials to PDE. Table 1 provides the basic demographic information of the school districts that submitted materials to PDE.

As noted in Table 1, the sample of districts that sent assessment materials is approximately 85% across Rural, Suburban, and Urban districts. Urban districts have a higher rate of non-proficiency than Suburban or Rural districts based upon PSSA performance. Across all district types, a substantial percentage of students in the Commonwealth do not score proficient in Mathematics and/or Reading given two opportunities on the PSSA.

Eighty-four percent of districts submitted local assessment practices or materials for review. The districts that submitted materials appeared representative of the Commonwealth. We further examined characteristics of the districts that did not submit materials in order to explore whether there were any trends among these non-reporting districts.

There were 79 school districts that did not submit materials after either the initial, or the follow-up, PDE requests for local assessment information. Table 2 presents descriptive information for these districts.

Table 1. Demographic Information for All Districts and for Reporting Districts.

	TOTAL	Rural	Suburban	Urban
All Districts	497*	226	231	40
Average District Enrollment 2006-2007	1163**	762	1300	2683**
Enrollment Range	85 – 47789	85 – 3760	188 - 9067	164 - 47789
Average Per-Pupil Expenditure (\$)	11925.45	11375.85	12474.21	11928.21
Expenditure Range (\$)	8174.25 - 23009.15	8174.25 - 20394.90	8484.56 - 23009.15	9058.45 - 15572.14
Average % failing both PSSA attempts	42.77	45.74	37.4	58.56
PSSA Range	10.2 - 93.1	19.3 - 77.3	10.2 - 75.4	26.7 – 93.1
Reporting Districts	418 (84.1%)	189 (83.6%)	195 (84.4%)	34 (85.0%)
Average District Enrollment 2006-2007	1185 (1072 w/o Districts of the First Class)	779	1295	2894 (1446 w/o Districts of the First Class)
Enrollment Range	85 – 47789	85 – 3760	188 - 9067	164 – 47789
Average Per-Pupil Expenditure (\$)	11988.41	11410.02	12556.58	11924.71
Expenditure Range (\$)	8174.25 - 23009.15	8174.25 – 20394.9	8634.41 – 23009.15	9058.45 - 15572.14
Average % failing both PSSA attempts	42.22	44.73	37.06	59.09
PSSA Range	10.2 - 92.2	19.3 - 77.3	10.2 - 75.3	33.6 – 92.2

^{*}Although there are 501 school districts in PA, 4 do not have high schools, thus are not eligible for this investigation

^{**} These numbers exclude Districts of the First Class

Table 2. Demographic Information for Non-Reporting Districts.

	TOTAL	Rural	Suburban	Urban
Non-reporting Districts(%)	79	37 (46.83)	36(45.57)	6 (7.59)
Average District Enrollment 2006-2007	1050	666	1295	1,646
Enrollment Range	317 - 3868	317 – 1,894	382 -3868	629 – 3,442
Average number of graduates 2006-2007	216	136	288	286
Graduation class Range	35 – 904	35-559	46 – 904	146 - 550
Average % failing both PSSA attempts	46.48%	51.30%	39.99%	55.72%
PSSA Range	17.8% - 93.1%	29.1%- 69.1%	17.8% - 75.4%	26.7% - 93.1%
Average Per-Pupil Expenditure (\$)	\$11,618.46	\$11,184.74	\$12,009.50	\$11,946.88
Expenditure Range (\$)	\$8,484.56 – \$16,121.68	\$8,921.52 -\$13, 986.57	\$8,484.56 - \$16,121.68	\$10,787 - \$14,502.57
Average % Free & Reduced Enrollment	34.32%	37.35%	28.11%	52.93%
Free & Reduced Enrollment Range	2.51% - 82.08%	8.92% - 60.81%	2.51% - 82.08%	19.83% - 77.58%

^{*}Excludes the 4 school districts that do not have high schools.

PDE indicated the date materials were received and documented materials by districts as they were submitted. To assure accuracy in accounting for submitted materials, we compared the PDE checklist with the Penn State Database. There was 100% agreement between the PDE recorded districts and the Penn State Database. Eighty-three school districts did not send local assessment information or materials as requested from PDE. However, 4 of these school districts do not have high schools and as such are not included in further analysis. Of the remaining 79 school districts with high schools, approximately 46.83% were from rural areas, 45.57% were suburban school districts, and 7.59% were urban. Overall the percent of non-proficient students on the 11th grade PSSA and the 12th grade retake was 46.48%. The per-pupil spending for the 79 school districts averaged \$11,618.46 and the average percent of students enrolled in the free and reduced lunch program in these schools was 34.32%.

Descriptive comparisons between the reporting and non-reporting districts suggest that non-reporting districts had a smaller average enrollment and had lower per-pupil spending. The average percentage of students non-proficient after both attempts of the PSSA was higher for the

non-reporting schools overall. Further, the non-reporting districts had a higher percentage of free and reduced lunch overall when compared to the districts' average for the State at 34.32% with the State average of 30.87%. While these *averages* may be slightly higher for the non-reporting districts, the non-reporting districts' percentages fall within the *range* of districts overall on these critical variables.

Section II: A Description of the Materials Submitted to PDE

Database Development and Expert Panel Preparation

Schools responded to the PDE request by sending local assessment materials directly to PDE. As assessments were received, they were mailed to The Penn State Research Team. At the onset, it was unclear what types of materials districts might provide. As a research team it was therefore necessary to first explore what types of materials were submitted in response to the PDE request. Therefore, The Penn State Research Team first worked in pairs to record on large chart paper the nature of the materials sent by each district accompanied by information each provided regarding how the local assessments were used. After an initial examination of approximately 100 districts, The Penn State Research Team established a better understanding of the nature of the sent materials.

As indicated in the introduction, a primary purpose of the study was to develop a research database to store information about the assessments submitted to the PDE as well as any reported practices used by the districts to determine proficiency levels. Therefore, The Penn State Research Team next developed an initial database generated in part by clear themes found in the nature of the materials submitted and with data found in PDE Education Names and Addresses (EdNA: http://edna.ed.state.pa.us). We entered information for each district. Specifically, the initial database fields included demographic information for each district and for schools within district, in-take date, contact information for personnel at the district or school level, the nature of materials submitted, and whether there was a PSSA policy/practice relative to local assessments reported. We made one first review through all school district materials, created files for each district, and filed them alphabetically. This first review of the information submitted to the PDE allowed us to process all materials and to build the database based upon initial data codes. The Penn State Research Team then conducted a second, more comprehensive, review of all of the materials.

For the second examination of all district files, we again worked in pairs to assure accuracy in entering information. Our goals were to simultaneously complete an expanded database and also to prepare materials for Mathematics and Reading expert panels to code. The expanded database clearly explicated school-reported assessment practices designed to measure student proficiency of standards. It also included more descriptive fields about Mathematics and Reading assessments. For example, we coded materials on assessment type (e.g., district-created assessment, published test, curriculum) as well as item type (e.g., multiple-choice, constructed response). We also used a random number generator to assign each district a random number. We used this procedure so that we could remove all identifying information about school districts before review of their materials by the expert panels. Therefore, as we completed data entry for this second review of the materials, we removed all identifiers on materials that districts

submitted through redaction. Separate Mathematics and Reading folders were created for panelist coding and all were labeled with the districts' random numbers.

Characteristics of the Assessment Materials Submitted by Districts

There was variance in the nature of the materials submitted for review by the districts. This variance included, for example, that some districts submitted a letter and others submitted various materials, in some cases multiple binders or boxes of materials, to represent their local assessment. Some districts reported that they did not have a local assessment. Others noted that proficiency on their local assessment was not a requirement for graduation purposes. Many districts reported that their curriculum was aligned to standards, and, as such, if students passed their coursework their performance in Mathematics and Reading was deemed proficient. Other districts reported use of attendance or citizenship as measures of proficiency. In response to the PDE request, many districts submitted descriptions or examples of assessments, curriculum, or policy statements. Whatever each district sent was used to create a folder that represented the local assessment for that district. Therefore, the local assessment folder might not have been an individual test, or any test at all, but might include a collection of tests from several courses or some combination of tests and other materials. In this section of the report, we note some of the characteristics of the materials submitted.

Table 3. Descriptive Information for Materials Initially Submitted by Districts.

Types of Materials Submitted b	y Districts Overall ($n = 418$,	districts that sent materials)
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Type of Material*	Mathematics Frequency (%)	Reading Frequency (%)
Multiple-choice Test	314 (75)	315 (75)
Constructed Response	269 (64)	273 (65)
Standardized/Published Test	140 (33)	150 (36)
Portfolio	33 (08)	40 (10)
Curriculum	36 (09)	35 (08)
Course	99 (24)	96 (23)
Tutoring	50 (12)	48 (11)

^{*}Districts may have submitted more than one type of material.

Table 4. Assessment Materials Initially Submitted by Districts by Type.

Type of Material		Mathematics	Reading			
	Rural	Suburban	Urban	Rural	Suburban	Urban
Reporting n	189	195	34	189	195	34
Multiple-choice Test (% within category)	133 (70)	161 (82)	20 (63)	133 (70)	161 (82)	21 (66)
Constructed Response (% within category)	110 (58)	141 (72)	18 (56)	112 (59)	142 (72)	19 (59)
Standardized/Published Test (% within category)	70 (37)	61 (31)	9 (28)	74 (39)	66 (34)	10 (31)
Portfolio (% within category)	16 (08)	16 (08)	1 (03)	15 (08)	24 (12)	1 (03)
Curriculum (% within category)	14 (07)	20 (10)	2 (06)	16 (08)	18 (09)	1 (03)
Course (% within category)	39 (21)	56 (29)	4 (13)	36 (19)	55 (28)	5 (16)
Tutoring (% within category)	23 (12)	22 (11)	5 (16)	22 (11)	21 (11)	5 (16)

Multiple-Choice and Constructed-Response Assessments

Districts often submitted tests or sets of assessments that they employ to measure proficiency. These materials were coded based upon the nature of the items that they included. Some of these sent-materials included copies from standardized assessments, and these were included in the coding. However, the assessments often represented teacher- or district-constructed assessments. Some districts submitted one test or multiple versions of a single test. Other districts submitted copies of tests for various courses within their respective curriculum for coding. In some of these cases, the districts stated that the courses were aligned to standards and therefore tests in the courses represented their measure of proficiency. In other cases, the districts submitted a number of tests with no explanation. In either case, these materials were prepared for coding and were coded as districts' artifacts of their local proficiency measure. As illustrated in Table 3 and Table 4, many districts included multiple-choice items and constructed-response assessments within their measures of proficiency. Many submitted materials that employed both types of assessment formats. We coded constructed-response items to include both fill-in types of items as well as problems or essays. These types of materials were submitted by Rural, Suburban, and Urban districts for both Mathematics and Reading as noted in Table 4.

Standardized Tests and Published Materials

Numerous districts reported use of a variety of either packaged published materials or tests or standardized assessments. The number of districts that reported using these types of materials is larger than represented in the sent materials. Districts often reported using these materials but did not actually send artifacts for coding. That is, if a district said they used the 4Sight test, for example, but did not send a copy of that test, it was not coded as materials submitted. However, the reported use of any standardized or published materials for the purposes of local assessment was coded both with respect to alignment of the materials to the proficiency standards and the validity of the practices reported by the superintendent to determine proficiency levels.

Some districts reported use of student performance on, or completion of, college admissions tests such as the SAT, ACT, or PSAT as a measure of proficiency. Other districts reported use of national standardized tests such as the Terra Nova, Metropolitan 8, or the Stanford Achievement Test 9 or 10. Others used diagnostic assessments such as the Group Reading Assessment and Diagnostic Evaluation (GRADE) or the similar Mathematics assessment (GMADE), or the Degrees of Reading Assessment (DRP). Still others used general education tests such as the GED practice test or student success on the GED examination or the TABE. Other districts noted use of PASSKEY assessment or the ASVAB career exploration assessment as the measure used to establish students' proficiency on the Mathematics and Reading standards.

In addition to national standardized tests, some districts turned to items from other states' released achievement tests to use as measures of proficiency. Several districts also reported the use of the tests developed by Intermediate Unit 8 (IU8). The 4Sight tests for both Mathematics and Reading were commonly used local assessments. While many districts used the 11th grade 4Sight tests, others reported use of 4Sight tests below 11th grade level (e.g., 8th grade). Several districts reported the use of the practice items or the released PSSA items as measures of proficiency. In addition to stand-alone assessments, districts reported the use of PLATO and Study Island, as well as PSSA Coach, and other books and software designed for remediation of PSSA content.

Table 5 provides the names and frequency of use of standardized and published materials submitted by districts. It is important to note that some districts reported using several of these measures and others reported using these in conjunction with district-developed curricula and assessments. Some districts sent these materials or stated their use without additional explanation. In these cases, we observed what was sent but did not attempt to infer how these materials were used. Further, some districts reported that they used just the assessments from programs such as Study Island but did not use the program as a tutorial. In all, districts reported nearly 60 different measures and materials in this category. The most frequently reported measures in this category were the 4Sight assessments and Study Island followed by PSSA Coach, PDE released items, and PLATO.

Table 5. Standardized Tests and Published Materials Frequencies.

4Sight 115 Study Island 72 PSSA Coach 35 PDE Released Items 28 PLATO 25 Intermediate Unit 08 Assessment 20 Measuring Up 13 Terra Nova 13 SAT 12 Princeton Review 9 NOCTI 7 PSAT 7 ACT 4 Cognitive Tutor 4 GED Practice Test 4 GMADE 4 GRADE 4 MAT 8 4 Aleks Software 3
PSSA Coach 35 PDE Released Items 28 PLATO 25 Intermediate Unit 08 Assessment 20 Measuring Up 13 Terra Nova 13 SAT 12 Princeton Review 9 NOCTI 7 PSAT 7 ACT 4 Cognitive Tutor 4 GED Practice Test 4 GMADE 4 GRADE 4 MAT 8 4
PDE Released Items 28 PLATO 25 Intermediate Unit 08 Assessment 20 Measuring Up 13 Terra Nova 13 SAT 12 Princeton Review 9 NOCTI 7 PSAT 7 ACT 4 Cognitive Tutor 4 GED Practice Test 4 GMADE 4 GRADE 4 MAT 8 4
PLATO 25 Intermediate Unit 08 Assessment 20 Measuring Up 13 Terra Nova 13 SAT 12 Princeton Review 9 NOCTI 7 PSAT 7 ACT 4 Cognitive Tutor 4 GED Practice Test 4 GMADE 4 GRADE 4 MAT 8 4
Intermediate Unit 08 Assessment 20 Measuring Up 13 Terra Nova 13 SAT 12 Princeton Review 9 NOCTI 7 PSAT 7 ACT 4 Cognitive Tutor 4 GED Practice Test 4 GMADE 4 GRADE 4 MAT 8 4
Measuring Up 13 Terra Nova 13 SAT 12 Princeton Review 9 NOCTI 7 PSAT 7 ACT 4 Cognitive Tutor 4 GED Practice Test 4 GMADE 4 GRADE 4 MAT 8 4
Terra Nova 13 SAT 12 Princeton Review 9 NOCTI 7 PSAT 7 ACT 4 Cognitive Tutor 4 GED Practice Test 4 GMADE 4 GRADE 4 MAT 8 4
SAT 12 Princeton Review 9 NOCTI 7 PSAT 7 ACT 4 Cognitive Tutor 4 GED Practice Test 4 GMADE 4 GRADE 4 MAT 8 4
Princeton Review 9 NOCTI 7 PSAT 7 ACT 4 Cognitive Tutor 4 GED Practice Test 4 GMADE 4 GRADE 4 MAT 8 4
NOCTI 7 PSAT 7 ACT 4 Cognitive Tutor 4 GED Practice Test 4 GMADE 4 GRADE 4 MAT 8 4
PSAT 7 ACT 4 Cognitive Tutor 4 GED Practice Test 4 GMADE 4 GRADE 4 MAT 8 4
ACT 4 Cognitive Tutor 4 GED Practice Test 4 GMADE 4 GRADE 4 MAT 8 4
Cognitive Tutor 4 GED Practice Test 4 GMADE 4 GRADE 4 MAT 8 4
GED Practice Test 4 GMADE 4 GRADE 4 MAT 8 4
GMADE 4 GRADE 4 MAT 8 4
GRADE 4 MAT 8 4
MAT 8 4
Aleks Software 3
Apangea 3
Jump Start 3
PassKey 3
PVASS 3
Maine Department of Education Sample Items 3
Stanford Achievement Assessments 3
ASVAB (Career Exporation) 2
Brain Child 2
Compass Learning 2
GATES Mac-Ginnitie 2
MAP 2
NOVA Net 2
PASA 2
PLAN 2
PSSA Finish Line 2
PSSA Test Prep Book 2
Scholastic Read 180 2
Oregon Department of Education Sample Items 2
Scantron Performance System 2
Skills Tutor 2
Success for All 2

Achieve 3000	1
Achievement Test of Basic Written English	1
(Townsend Press)	
AIMSWEB	,1
AMSCO	1
APEX Learning	1
BlendedSchools.Net	1
Bridges	1
Capital Area Intermediate Unit Assessment	1
CTC	1
CTP 4	1
EduTest	1
E-Metrics	1
Homeroom.com	1
ICTC	1 -
Keys to Work	1
March 2 Success	1
MYAccess	1
Nevada Department of Education Sample Items	1
Smart Math	1
STAR Math	1.
STAR Reading	1
TABE	1
WADE	1
Web Achiever	1
Woodcock Reading Battery	1

Curricula

Some districts submitted curriculum materials as their local assessment used to demonstrate proficiency on the Mathematics and Reading standards. The materials within this category represented considerable variance. Materials were coded as curricula if they included individual curricular materials or a full course curriculum with identified standards. Some districts submitted curricula with accompanying tests while others did not send course materials, but simply a course description.

Portfolios

Some districts reported that they utilize portfolios as their local assessment for students to demonstrate proficiency on the standards for Mathematics and Reading. We coded a portfolio as a local assessment for a district if either the district stated use of a portfolio or if they sent a portfolio description. As illustrated in Table 3, 33 school districts reported use of portfolios for Mathematics and 40 reported use of portfolios for Reading.

Through further examination of information districts provided about the assessment practices they employ, it appears that portfolios are typically used to measure proficiency in one of two ways. First, portfolios can be the last option if a student fails other local assessments, such as tests, or, second, they are used as a district's single local assessment. The contents of the portfolios reported as used can be divided into three broad categories: (1) portfolio content that is comprised of assignments/tests from published material such as Measuring Up, PSSA Coach, or Study Island; (2) portfolio content that is comprised of student-selected work from a course or a group of courses (these include tests and/or assignments); or, (3) portfolio content that is comprised of individualized assignments reflecting the areas in which an individual student scored non-proficient on the PSSA. Finally, some school districts indicated that the portfolio that students must create as part of their graduation requirement also is used as a means of determining proficiency on the academic standards.

Courses and Tutoring

Some districts reported the use of a stand-alone course or a tutoring program as their local assessment that students complete in order for the district to measure proficiency. Some of these courses and tutoring were reported in conjunction with commercially-available programs, such as Study Island or PLATO. Others were tutoring programs, summer school programs, or after-school programs conducted by the district. A local practice was coded as a course or a tutoring program based upon district description. Tables 3 and 4 present the frequencies and percentages of districts that reported courses and tutoring as a component of their local assessment practice.

In conclusion, there was considerable variance in what districts submitted as their local assessments. Materials submitted included both published and locally-developed tests and other materials. All materials submitted were cataloged. If a district sent materials, those materials were included as local assessments and placed into a district folder for later coding. Materials were included whether or not the district submitted explanation or clarification regarding how their local assessments were used. As noted, all of the district folders were prepared for expert panel review. In the following section, we describe the procedures used to rate the degree to which local assessments aligned to proficiency standards and how the practices reported by districts were considered as potentially valid mechanisms to measure proficiency.

Section III: Local Assessment Measures of Materials Alignment and Reported Practices

Invitation to Expert Panelists

Expert practitioners from across the state were selected to review and rate the materials that districts submitted as their local assessment. PDE invited experts in Mathematics and in Reading to serve on the panels. These invitations were extended with assistance from Intermediate Units, superintendents, and through knowledge of previous work conducted by the practitioners in the Commonwealth. Experts were selected according to several criteria (e.g., the geographic locations within the Commonwealth of their respective affiliations; years of administrative/teaching experience). Experts were not paid for their work. Each expert received mileage, tolls, and meals in accord with State and Federal per-diem allotments. Reimbursement for substitute teachers' salaries was provided directly to the districts for those experts who were

teachers for whom classes had to be covered during scheduled dates of the coding. The expert panel was comprised of 24 members equally divided into two teams, a 12-member panel for Reading and a 12-member panel for Mathematics. Among the panelists, 18 are classroom teachers, six of whom are chairs in their respective departments; several teach at nearby colleges. Two panelists are administrators (a high school principal and a curriculum supervisor), two are PSSA coaches (a literacy coach and a mathematics coach), one is an instructional specialist, and one is an educational assessment specialist.

Panelists' experience with curriculum development and the PSSA is extensive and varied. As noted, two are PSSA coaches in their schools; while others have developed and taught PSSA refresher and remediation courses in their content areas. Twenty-two reported having experience with school-level curriculum development, and half reported direct experience with development of their districts' local assessments. Eight panelists participated in development of the PSSA on tasks such as item analysis. Panelists' overall years of experience in education ranged from 7 to 37 years. Together they brought nearly 450 years of experience to the coding task.

Purposes and Procedures for Expert Panelists

Members of the expert panels traveled to State College to evaluate assessment materials and practices. Content experts were first provided with a brief overview of the purposes of the local assessment study. After introductions by members of the panel and The Penn State Research Team, experts completed a pretest to assign codes to a sample of assessment practices used by school districts in their evaluation of the proficiency standards. The practices survey was constructed with 42 rating scale entries that emerged based on The Penn State Research Team's comprehensive review of information sent by districts as to how they implemented procedures using their assessment materials to determine proficiency in Mathematics and in Reading (see Appendix E). After completion of the pretest practices survey, experts separated to complete content-area specific coding training. This training, as next presented, was conducted to prepare experts to determine whether materials submitted by districts could result in data that could determine whether students met Mathematics or Reading proficiency standards. It is important to note that districts were not asked to submit actual responses of students. As such, panel members did not evaluate student performance relative to the standards. Panel members only examined assessment materials sent to the PDE.

The Training Session

Materials were selected for training to cover the variety of types of assessments sent by school districts (See Section II, Table 4). Some materials were included in training because they were frequently submitted by districts as a local assessment. Examples of these assessments included 4Sight, the Intermediate Unit 8 (IU8) test, and Study Island. Others, however, were selected due to their unique nature (e.g., curriculum, set of district-made midterm and final examinations). To prepare materials for coding by the expert panelists, we categorized all materials sent by school districts into four groups of assessments. These groups were labeled as T1 and T2 for types of tests sent and C1 and C2 for two categories of curriculum materials. Descriptions of each of these assessment categories are as follows:

- T1: Local assessments used by districts to measure proficiency on the standards (e.g., a district-created test used with high school seniors who failed to meet proficiency on the 11th grade PSSA and the 12th grade retake exam) with at least some description as to implementation of assessment to determine proficiency levels
- T2: Local assessments used by districts but with no general or detailed description of how they are used as a measure of proficiency (e.g., final exams for senior level English and Mathematics courses but with no accompanying explanation)
- C1: Curriculum materials used by districts to measure proficiency on the PA standards (e.g., PSSA remediation course description and related course and assessment materials used to measure proficiency) with at least some description as to implementation of assessment to determine proficiency levels
- C2: Curriculum materials used by districts but with no general or detailed description about how they are used to measure proficiency (e.g., course syllabi for senior level English or Math courses but with no accompanying explanation)

After all assessment materials were categorized in this manner, we created crates of materials for panelists organized by category type and ordered by randomly-generated numerical code. Specifically, for both Mathematics and for Reading, four organized systems of materials were prepared. For each content area, the system of materials was assigned to 1 of 4 expert panel groups (i.e., 8 teams total). Each expert panel group was represented by three members. National advisers in Mathematics and Reading assessment, Kim Gattis and Julie Coiro, helped to prepare instructions for training so that all members in a group were directed to review each folder of material together and to arrive at a consensus code for rating the degree to which the materials in the folder could serve as a means to validly measure the proficiency standards.

We distributed each type of material (T1, T2, C1, C2) across the eight teams. The experts were blind to this coding scheme so they approached all materials with the same mindset. As mentioned previously, each district's *folder* was coded as the unit of analysis. Specifying the folder as the unit of analysis was important since it was possible that some districts could include just one test that would include all content areas listed in the standards. Comparatively, it was often the case that districts submitted sets of tests where each assessment represented one content area (e.g., Algebra, Geometry) referenced in the proficiency standards. Therefore, we deemed the set of materials (i.e., the folder), whether a single source or multiple lessons/tests, as the best representation of information to define each school district's local assessment.

Coding Procedures for Alignment of Materials to the Proficiency Standards

In two separate rooms, the panel experts in Mathematics and in Reading assigned consensus codes to folder materials. Experts in Mathematics education worked with the national adviser in Mathematics assessment, Kim Gattis, in one conference room. Likewise, experts in Reading

education worked in another conference room with the director of the project, Rayne Sperling. In each location, the four expert teams assigned codes independently. As such, their dialogues were independent of one another. Kim Gattis and Rayne Sperling intervened during the coding sessions only as panelists had any questions about procedures. Therefore, neither provided any instruction or recommendations as to code assignment, nor did they confirm any sense of accuracy given a consensus code recorded by an expert team.

Rating scale materials. Each team of experts was provided two forms to facilitate coding. First, they were given the list of the proficiency standards to which they could refer as they examined each folder of materials (See Appendix C for references of the proficiency standards in Mathematics and in Reading, respectively).

Each expert rating group had one code-assignment sheet. As displayed in Appendix D, this rating scale sheet presented the folder code in the first column. The second column presented material code(s). The third column presented letters (i.e., A, B, C, D, E) that coincided with the specific list of standards against which the materials submitted by districts could be evaluated as a means of determining proficient performance. The fourth column presented space for rating proficiency. In the final column, expert panel group members could record comments. In many instances, group members documented reasons why they assigned a particular rating scale code. Additionally, for some folder entries, the experts conveyed that they viewed the assessment materials as excellent ways to measure proficiency. The scale used by experts to judge the degree to which the assessment materials aligned to proficiency standards is provided in the left hand column of Table 6.

Table 6. Examples of Materials Coded by Expert Panels by Level.

	Mathematics	Reading
0 = No content areas represented; no alignment of outcomes to standards.	 No assessment information provided Calculus Final Exam Content area assessment used as Mathematics proficiency (e.g., Science test or English exam) Assessment with errors in items or answers Portfolio without Mathematics content Curriculum materials with no observable outcome measure 	 No assessment information provided Below grade level assessments (e.g., 8th grade Reading test) Isolated vocabulary test Isolated grammar test Content area assessment used as reading proficiency (e.g., American Government assessment or Science test)
		test) Curriculum materials with no observable outcome measure Writing assessments

		used as measure of
		reading proficiency
		roading proficiency
1= Some content areas represented; some outcomes are aligned.	 Course overview or table of contents, but aligned to proficiency standards Assessment that does not match standards Assessment above eligible content that may include some standards Assessment far below grade level that may include some standards Assessment that includes low and high level items in a single content area (e.g., Trigonometry) A single midterm or final exam for one particular content area (e.g., Algebra or Geometry). 	 Standardized test that does not align to PA Standards Above or below grade level assessment with or without text that matches some standards Good example that only partially addresses limited standards No variety of texts, for example, all narrative without attempt to measure standards Collection of tests not aligned to standards Assessment with emphasis on recall not
2=Many to most content areas represented; most outcomes are aligned.	 Assessment or collection of assessment that may be missing only one area (e.g., Geometry or Probability) Collection of chapter tests and quizzes Assessment that includes content beyond the standards Assessment that has all standards but students are given option to complete sections 	reading Many but not all standards addressed Inappropriate text materials but attempt to meet standards Assessment that addresses outdated standards Lacks systematic coverage of standards (e.g., may not have propaganda/bias, or poetry as part of assessment) Released PSSA items
3=All content areas represented; all outcomes are aligned.	An assessment or a collection of assessments that include at least one item for each standard (Even though some students may not take all assessments)	Grade level text(s) present with items/tasks that meet all proficiency standards. Performance assessment

- 4-Sight assessment
- IU 8 assessment
- Study Island assessments.
- An assessment that covers all proficiency standards as either one test or a collection of tests with emphasis on use of knowledge in problem solving.
- representative of standards
- Study Island assessments

When data were available, each district was given a materials rating for Mathematics and for Reading. When interpreting the ratings of district materials, there are a few important considerations. First, in cases where a district used more than one assessment, the materials rating recorded represented the *highest* rating given to any assessment the district reported using. For example, if a district used a locally-developed test that experts rated as a '1' and another standardized assessment, given a '2', a '2' was recorded as the district materials rating. Second, the codes for materials were assigned based upon the contents of a district *folder* as the unit of analysis. Therefore, if a district provided multiple assessments and across the assessments all proficiency standards were addressed, then the district would receive a '3'. It may be, however, that not every student would take every assessment represented in the district folder. Third, no consideration was made for number of items or depth of understanding required of students in answering the items. If any item(s) or task(s) that represented a proficiency standard were present within the materials then they were coded as such.

Results

As shown in Table 7, experts in the Mathematics rating groups assigned higher average materials codes than experts in the Reading rating groups overall. The mean of 2.77 approximates the highest code that could be assigned given the scale (i.e., 3 = All content areas represented; all outcomes are aligned to proficiency standards). Table 8 provides the frequencies of materials overall and for rural, suburban, and urban districts. Because rating categories define an ordinal scale of measurement, we also present the frequencies per category in Table 13. This cross tabulation is a summary that combines information for both ratings of alignment to materials standards as well as ratings used to evaluate reported use of practices (to be described in sections of this report that follow). The rating scale categories for practices appear as rows and the ratings for alignment appear in the columns.

As indicated in Table 7, 321 of the 418 (i.e., approx. 77%) folders evaluated by the Mathematics expert panel groups received a code of 3. Comparatively, Reading expert panel groups only assigned this highest rating code for 99 of 418 (i.e., approx. 24%) of the folders they reviewed. This lower percentage is reflected in their overall average (1.79), as indicated in Table 7. For both Mathematics and for Reading, averages reported for type of district looked similar to the

overall averages presented in Table 7 for each discipline. Some districts did not provide materials with their practice or practice with their materials. These districts therefore, although they responded to the PDE requests, will not have data for one of these category codes. These districts' information is represented as 'missing' in subsequent tables.

Table 7. Materials Alignment Means and Standard Deviations of Scores for Reporting Districts.

Group (n)	Mathematics		Reading		
•	Mean (S.D.)	Missing	Mean (S.D.)	Missing	
All (418)	2.77 (0.57)	31	1.79 (0.95)	36	
Rural (190)	2.78 (0.58)	18	1.75 (1.01)	23	
Suburban (196)	2.79 (0.53)	9	1.81 (0.90)	9	
Urban (32)	2.61 (0.79)	4	1.82 (0.86)	4	

Score range for all groups is 0-3.

Table 8. Reading and Mathematics Materials Alignment Scores for Reporting Districts.

Mathematics

Group (n)	0	1	2	3	Missing
All (418)	6 (.01)	12 (.03)	48 (.11)	321 (.77)	32 (.08)
Rural (190)	4 (.02)	2 (.01)	21 (.11)	145 (.76)	18 (.09)
Suburban (196)	1 (.01)	7 (.04)	23 (.12)	156 (.80)	9 (.05)
Urban (32)	1 (.03)	2 (.06)	4 (.13)	20 (.63)	5 (.16)

Reading

Group (n)	0	1	2	3	Missing
All (418)	39 (.09)	105 (.25)	138 (.33)	99 (.24)	37 (.09)
Rural (190)	21 (.11)	47 (.25)	51 (.27)	48 (.25)	23 (.12)
Suburban (196)	15 (.08)	54 (.28)	71 (.36)	47 (.24)	9 (.05)
Urban (32)	3 (.09)	4 (.13)	16 (.50)	4 (.13)	5 (.16)

Reliability of Rating Scale Codes

For many commonly used assessments, consensus was established among the expert panels. For example, Study Island was aligned as a '3' for both Mathematics and Reading experts. For approximately 20 percent of the remaining school district folders that included less-frequently-used assessments, two panelist groups provided ratings in an effort to establish rating agreement. A procedure was implemented such that every 5th folder was randomly assigned to two expert groups. The two expert groups varied such that all combinations of groups were represented.

Kappa coefficients were then computed to determine the consistency between rating pairs given the folders assigned to one group which were also evaluated by 1 of the 3 other expert panel groups. Specifically, Kappa coefficients were computed, one per expert panel group across both

disciplines (i.e., Mathematics and Reading). Coefficients ranged from .52 to .82 for these less frequently-occurring materials. In summary, therefore, while members within panel groups assigned ratings with 100% (i.e., consensus) agreement, across-group ratings for materials were not always the same. These variations in scoring assignment by groups who rated the same sets of materials may be related to both the amount and variety of information submitted by districts and assembled into their folders as units of analysis. Further, the between- group variance of the randomly assigned expert panels may also have been a factor in coding.

District-Reported Practices as Measures of Proficiency

As mentioned previously, experts also completed a practices survey. This survey was administered prior to rating the degree to which materials aligned to the proficiency standards as well as directly after coding by expert panel groups was completed. The 42 survey items were constructed by Project Directors, Sperling and Kulikowich, based on an exhaustive review of the practices reported by school districts regarding use of their assessment materials to determine proficiency status (see Appendix E). The entries were designed to cover the range of materials submitted, from curricula to district-developed tests. Additionally, the project directors read each reported practice saved in the research database twice. This was done to reflect actual language on the survey used by the districts as their reported practices. For example, several districts reported that students could retake an examination multiple times until proficiency level was reached. Other districts, by comparison, reported that students had a limited number of opportunities to retake an examination. After so many attempts, their diplomas would be withheld if proficiency status was not reached. Every effort was made to represent these types of distinctions in the construction of the practice survey stems.

The Rating Scale for Reported Practices

As with the codes for alignment of materials to the proficiency standards, each stem on the survey was evaluated using a four-point categorical scale. A score of 0 indicated that "the practice as reported *cannot* ensure proficiency level in Mathematics and/or Reading is met." A score of 1 indicated that the information provided "is *insufficient* to determine whether proficiency in Mathematics and/or Reading is met." A score of 2 indicated that there "are *some good* practices reported to determine proficiency level; however, more information is needed." A score of 3 represented reported practices that were deemed "a *valid* system of procedures to determine proficiency in mathematics and/or reading."

Again, each panelist rated each practice statement (n = 42) twice, once before evaluating the materials used by the districts (i.e. tests and curricula), and once after the materials were evaluated. Panelists were also invited to record comments about the practices. Three measures of central tendency were calculated: the mean, median, and mode. Standard deviations were between .5 and 1, making the mean a poor measure. Mode was used to decide the classification of the practice, with the median as an additional source of information when needed. The median and mode were identical for most practices. Mathematics and Reading experts agreed on the viability of many reported practices, especially those practices that received either lower or higher scores.

Panel Discussions and Consensus Agreement on Practices

After completion of the posttest survey for practices, the national adviser in Mathematics assessment, Kim Gattis, and Co-Project Director Kulikowich, discussed the survey ratings with the expert panelists in Mathematics. Co-Project Director, Sperling, had a similar discussion with the Reading specialists. These debriefing sessions lasted approximately 30 minutes. The purpose of the discussions was to ask panelists to review the practice statements and to come to consensus as to those reported practices that absolutely could not be implemented by a district to determine proficiency as well as those procedures that could be considered "best practices" in evaluating proficiency in reliable and valid ways.

District Follow-up Procedures

As noted, when districts initially responded to the PDE requests for information regarding Mathematics and Reading local assessments, there was considerable variance in the types of materials submitted by districts. There was also variance in the amount of detail that districts provided regarding their local assessment practices. Some districts provided detailed, step-by-step procedures for determining proficiency for students who did not reach proficiency on the senior retake PSSA. Other districts reported simply that students 'received tutoring' or 'took a class' or 'took an alternative assessment.' In an effort to obtain additional information to assure the accuracy of ratings of local practice given to districts, PDE staff members phoned many districts and asked district personnel for additional details regarding their local assessments. As not all districts were able to be reached, to assure all districts were represented consistently and accurately, a follow-up survey was sent to each of the 418 districts for which information was submitted in compliance with the initial PDE Penn Link requests.

The survey form was sent electronically by PDE to the superintendents of all reporting districts. The primary purpose of the survey was to provide superintendents an opportunity to verify and/or modify the description of assessment practices associated with the materials submitted for their respective school districts. Superintendents were asked to examine the materials and practices recorded for their districts and to either confirm the practice as accurate or to make any necessary corrections to the information provided about their school district's local assessment materials and practices. In addition, superintendents were requested to specifically address aspects of their district practice. First, superintendents reported whether students must pass the local assessment to graduate or if alternative provisions remain for students to graduate without passing the local assessment. Second, they were asked to report whether students are permitted to retake or resubmit the assessment in part or whole in order to obtain a passing score. Third, they responded to whether the local assessment used is part of course or cumulative grades that are used for graduation purposes. Superintendents returned this information to The Penn State Research Team through a filtered email address specifically designated for the return of the surveys. Each survey response was printed. All responses and any alterations were documented and entered into corresponding codes in the database. All of the new data were included with existing information and were used in the coding practices. The survey sent to superintendents is displayed in Appendix H.

Of the 418 responding districts, 327 responded to the survey and most provided additional information. Table 9 provides the coded responses of the districts overall and by type of district. A majority of districts took the opportunity to amend the information provided regarding their local assessment practices. Even when superintendents responded that the summary of their local assessment practice was accurate, they often included notes or comments with their survey responses.

Table 9. Agreement of Responses (n = 418, districts that sent materials).

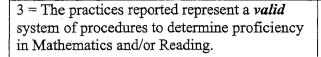
Type of District	Yes (1)	No (2)	Yes-No (3)	No Response	Missing
All	161 (.39)	150 (.36)	2 (.05)	14 (.03)	91 (.22)
Rural	71 (.37)	63 (.33)	2 (.01)	9 (.05)	45 (.24)
Suburban	78 (.40)	76 (.39)	0 (0)	5 (.03)	37 (.19)
Urban	12 (.38)	11 (.34)	0 (0)	0 (0)	9 (.28)

The new data provided by the superintendents were incorporated into the existing database. These data, the sets of consensus codes, and a review of the pretest and posttest survey responses grounded the development of a coding rubric for local assessment practices. Sperling and Kulikowich used this coding rubric as they assigned a code for every practice reported by districts as found in the research database. Table 10 presents the scoring rubric and descriptive criteria used for reported practices coding. As indicated in Table 10, districts that used attendance as a measure of proficiency or did not have a proficiency requirement for graduation were assigned a practice code of '0'. Other practices and anchors illustrate some of the common practices found across districts.

Table 10. Proficiency Codes and Representative Practices.

To code practices for Mathematics and Reading for each of the districts, we relied on the following rubric grounded in the expert panelists' consensus ratings. A practice was not given a rating higher than the alignment rating. That is, if a local assessment was given an alignment rating of '2', it could not receive a practice rating greater than '2'.

Proficiency Code	Representative Practices
0 = The practice as reported <i>cannot</i> ensure proficiency level in Mathematics and/or Reading is met.	 No proficiency requirement for graduation Graduation project serves as proficiency standard Summer course attendance after graduation Remedial course attendance without any explanation of how grades are assigned Courses without an objective measure or portfolios with no standard rubric system Tests not aligned to standards Cumulative grades for which aligned objective measure is not weighted more than 50% of grade Unlimited retakes of unsecured assessments in part or full
1 = The information about practices provided is <i>insufficient</i> to determine whether proficiency in Mathematics and/or Reading is met.	 Retakes of aligned assessments that exceed the number of forms of the assessment (if perfectly aligned) When information was not adequate to fully evaluate the practice and the alignment was at least a '2' Ambiguous security or retake opportunities of an aligned assessment
2 = There are <i>some good</i> practices reported to determine proficiency level; however, more information is needed.	 When information was not adequate to fully evaluate the practice and the alignment was a '3' Valid practice with a alignment of '2' Fully aligned assessment with ambiguous security or retake opportunities Fully aligned and secure assessment with unclear information about how the scores or ratings determine that proficiency levels have been met Aligned assessment without clear criteria for proficiency



- Fully aligned secure assessment with retakes that do not exceed number of assessment forms
- Fully aligned assessment with randomlygenerated (e.g., computer-based) items
- Fully aligned and secure assessment that has scores or cut-off points to measure proficiency

Therefore, when complete data were available, school districts that submitted materials and reported practices received codes both for alignment of their materials to proficiency standards as well as ratings of the degree to which the reported practices could determine whether proficiency levels of performance had been attained. Table 11 presents these results with average ratings for the practices overall for both Mathematics and Reading. Table 12 provides the summary of local assessment practices overall and by district type.

A few observations can be made. First, for both Mathematics and Reading, averages for the practice codes are lower than those for the material alignment codes. Second, these averages are similar (i.e., less than 1) across type of district. Third, as with the materials ratings, the practice ratings were higher for Mathematics than for Reading. As noted in Table 12, 31 districts' Mathematics practices were coded a '3' while 19 Reading practices reported by districts received the highest rating.

<u>Table 11. Local Assessment Practices Means and Standard Deviations of Scores for Reporting Districts.</u>

Practice Scores

Group (n)	Mathema	atics	Reading	
	Mean (S.D.)	Missing	Mean (S.D.)	Missing
All (418)	0.90 (0.97)	8	0.69 (0.91)	10
Rural (190)	0.98 (0.98)	5	0.75 (0.95)	.7
Suburban (196)	0.84 (0.95)	3	0.65 (0.86)	3
Urban (32)	0.75 (1.02)	0	0.56 (0.95)	0

Score range for all groups is 0-3.

Table 12. Reported Practices Scores for Reporting Districts.

Mathematics

Group (n)	0	1	2	3	Missing
All (418)	184 (.44)	117 (.28)	77 (.18)	31 (.07)	9 (.02)
Rural (190)	74 (.39)	58 (.31)	36 (.19)	17 (.09)	5 (.03)
Suburban (196)	92 (.47)	52 (.27)	37 (.19)	12 (.06)	3 (.02)
Urban (32)	18 (.56)	7 (.22)	4 (.13)	2 (.06)	1 (.03)

Reading

0	1	2	3	Missing
231 (.55)	96 (.23)	61 (.15)	19 (.05)	11 (.03)
98 (.52)	47 (.25)	26 (.14)	12 (.06)	7 (.04)
111 (.57)	45 (.23)	31 (.16)	6 (.03)	3 (.02)
22 (.69)	4 (.13)	4 (.13)	1 (.03)	1 (.03)
	231 (.55) 98 (.52) 111 (.57)	231 (.55) 96 (.23) 98 (.52) 47 (.25) 111 (.57) 45 (.23)	231 (.55) 96 (.23) 61 (.15) 98 (.52) 47 (.25) 26 (.14) 111 (.57) 45 (.23) 31 (.16)	231 (.55) 96 (.23) 61 (.15) 19 (.05) 98 (.52) 47 (.25) 26 (.14) 12 (.06) 111 (.57) 45 (.23) 31 (.16) 6 (.03)

In the next paragraphs we examine the relationships between alignment and practices codes for Mathematics and Reading and also explore the relationships between Mathematics and Reading materials and practices. As presented in Table 13, 31 of 418 districts had highest codes for both their alignment of assessment materials to proficiency standards as well as reported practices that could determine a valid evaluation as to whether proficiency status could be attained. Many of these districts employ the use of Study Island or 4Sight, both materials that received a '3' code for Mathematics coupled with a secure assessment procedure. For Reading, this frequency was lower; 19 districts. This is in part due to experts' consensus that students must engage with a text passage as part of the local assessment in order for the assessment to attain a score of '3' for alignment. It is important to reiterate that all codes were assigned solely based on information submitted to the PDE for review as well as information reported by school district personnel about uses of their local assessments to determine proficiency levels. As illustrated in Table 10,

stringent practices were required in order for districts to attain a '3' score on local assessment practices.

We next explored the nature of the relationship between Reading and Mathematics assessments. As presented in Table 14, 98 districts had materials that were rated a '3' for both Mathematics and Reading. Regarding practices, 18 districts had both a Reading and a Mathematics practice that was coded a '3'. Overall 18 districts had a rating of '3' for materials in both Reading and Mathematics and a rating of '3' for both Mathematics and Reading practices.

Table 13. Reported Practices by Alignment Ratings for All Reporting Districts.

Mathematics Practices by Alignment Overall (n = 383, 91.6% of reporting districts)

Alignment→ Practices ↓	0	1	2	3
0	6 (.016)	10 (.026)	35 (.091)	108 (.281)
. 1	0 (.000)	1 (.003)	11 (.029)	105 (.273)
2	0 (.000)	0 (.000)	2 (.005)	74 (.193)
3	0 (.000)	0 (.000)	0 (.000)	31 (.081)

Reading Practices by Alignment Overall (n = 376, 90.0% of reporting districts)

Alignment→ Practices ↓	0	1	2	3
0	38 (.101)	73 (.194)	. 74 (.197)	17 (.045)
1	0 (.000)	30 (.080)	39 (.104)	26 (.069)
2	0 (.000)	0 (.000)	23 (.061)	37 (.098)
3	0 (.000)	0 (.000)	0 (.000)	19 (.051)

Note: Cell entries are frequency counts, with proportion of n for chart, not overall n (e.g., proportions calculated on the first table are out of the 383, for which we have complete Mathematics alignment by practices information, not on the 418 total of reporting districts).

Table 14. Relations Between Alignment and Reported Practices in Mathematics and Reading.

Alignment: Mathematics by Reading Alignment Overall (n = 378, 90.4% of reporting districts)

Reading→ Mathematics ↓	0 .	1	2	3
0	6 (.016)	0 (.000)	0 (.000)	0 (.000)
1	2 (.005)	6 (.016)	3 (.008)	0 (.000)
2	6 (.016)	22 (.058)	17 (.045)	1 (.002)
3	24 (.063)	74 (.195)	118 (.312)	98 (.259)

Practices: Mathematics by Reading Alignment Overall (n = 407, 97.1% of reporting districts)

Reading→ Mathematics ↓	0	1	2	3
0	180 (.442)	3 (.007)	1(.002)	0 (.000)
1 .	41 (.101)	73 (.179)	1(.002)	0 (.000)
2	5 (.012)	17 (.042)	54 (.133)	1 (.002)
3	4 (.010)	3 (.007)	5 (.012)	18 (.044)

Conclusion

This study represents the most comprehensive examination to date of Pennsylvania district-level local assessments that serve as an alternative high school graduation requirement. In its review of the hundreds of assessments provided by 418 school districts statewide, the research team noted diversity in the type, format, and quality of materials that districts submitted and reported that they use to determine students' proficiency levels in Mathematics and Reading to meet graduation requirements.

Review of the materials by expert panels found variance in the degree of connection between the assessments and 11th grade proficiency standards. While Mathematics assessments were more often rated as aligned, ratings were considerably lower for Reading assessments.

Because alignment is a necessary but insufficient criterion for determining validity of an assessment, the research team also evaluated the administration and use of local assessment practices based on information provided by district staff. The researchers noted considerable variance among districts.

Finally, the research team examined ratings for alignment and practice and reported that for Mathematics, thirty-one school districts (8.1%) had ratings of '3' for both, while nineteen (5.1%)

districts received ratings of '3' for both alignment and practice in Reading. Based on criteria established by the panels, evidence of alignment to standards and practices that could result in valid measures of proficiency was present from 5 percent of school districts statewide given information submitted and reported about both their Mathematics and Reading assessments.

Appendix A: The Penn State Research Team

Rayne Sperling, Co-Principal Investigator

Jonna Kulikowich, Co-Principal Investigator

Crystal Ramsay, Project Coordinator

Toni Betaudier, Research Associate

Whitney Zimmerman, Research Associate

Kelli Higley, Research Associate

Appendix B: Fields that Correspond with Submitted Database

- A. Materials (from Summer 2008 PDE request) received:
 - a. 1= Yes, we did receive material.
 - b. Blank= We did not receive any materials.
- B. Date: Date stamped by PDE. If district sent something but there was no visible date stamp, field was left blank. If materials were submitted based on follow-up phone calls from PDE, a date was not indicated for those materials.
- C. School ID: Randomly-generated and assigned school ID number
- D. See ID#: For school districts with multiple schools that only sent one set of materials; This field tells which School ID number to refer to for the information for the school. Schools with same numbers are from same districts.
- E. School AU number: PDE-generated school number
- F. School Name: Name of the high school; linked to EDNA.
- G. Enrollment, 2006-07
- H. District enrollment, 2006-07
- I. District Count: Number of schools in the school district
- J. District quartile
- K. Fail quartile
- L. Expenditure quartile
- M. School District: Linked to EdNA
- N. IU Affiliation
- O. City
- P. County
- Q. School Type: Information taken from the Ensuring Success for All High School Graduates document provided by PDE
- R. % of graduates who did not score proficient/advanced in Mathematics AND Reading on the 2005-06 11th grade PSSA AND the 12th grade retest: Information taken from the Ensuring Success for All High School Graduates document provided by PDE (District level data)
- S. Number of graduates who did not score proficient/advanced in Mathematics AND Reading on the 2005-06 11th grade PSSA AND the 12th grade retest: Information taken from the Ensuring Success for All High School Graduates document provided by PDE (District level data)
- T. Number of graduates 2006-2007: Information taken from the Ensuring Success for All High School Graduates document provided by PDE (District level data)
- U. Per-pupil spending: Information taken from the "2006-07 Total Exp per ADM" document provided by PDE. (District level data)
- V. Free and reduced lunch: % free and reduced enrollment from "2007-08 Building Data" document provided by PDE (District level data)
- W. Administrator: Name of administrator; Some of these names are linked to EDNA.
- X. Title of administrator
- Y. Contact Person: Based on the cover letters sent by schools, some indicated who the contact person is regarding the material sent and who to contact if further information is needed. In cases where no contact person is listed, defer to Column W.
- Z. Contact person (Column Y) phone number

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AA. District PSSA policy included:
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- a. 0 = No policy sent, or no policy can be inferred from the materials that were sent.
- b. 1 = Yes, District stated X as their policy; cannot not infer that a proficiency standard is required. This is what the school says they used.

AB. District graduation policy included

- a. 0 = No policy sent
- b. 1 = Sent policy

AC. Tests provided for Mathematics?

- a. 0 = No, test(s) not provided
- b. 1 = Yes, test(s) provided

AD. Scoring system provided for Mathematics test(s) (e.g., rubric, scoring key)?

- a. 0 = No, scoring system not provided
- b. 1 = Yes, scoring system provided

AE. Multiple-choice items included on Mathematics assessments?

- a. 0 = No
- b. 1 = Yes

AF. Open-ended, or constructed response, items included on Mathematics assessments?

- a. 0 = No
- b. 1 = Yes

AG. Standardized/published tests in Mathematics?

- a. 0 = No
- b. 1 = Yes

AH. Portfolio/project in Mathematics?

- a. 0 = No
- b. 1 = Yes

AI. Scoring system provided for Mathematics portfolio/project (e.g., rubric, scoring key)?

- a. 0 = No
- b. 1 = Yes

AJ. Mathematics curricula?

- a. 0 = No
- b. 1 = Yes

AK. Mathematics course?

- a. 0 = No
- b. 1 = Yes

AL. Mathematics tutoring?

- a. 0 = No
- b. 1 = Yes

AM. Tests provided for Reading?

- a. 0 = No, test(s) not provided
- b. 1 = Yes, test(s) provided

AN. Scoring system provided for Reading test(s) (e.g., rubric, scoring key)?

- a. 0 = No, scoring system not provided
- b. 1 = Yes, scoring system provided

AO. Multiple-choice items included on Reading assessments?

- a. 0 = No
- b. 1 = Yes

- AP. Open-ended, or constructed response, items included on Reading assessments?
 - a. 0 = No
 - b. 1 = Yes
- AQ. Standardized/published tests in Reading?
 - a. 0 = No
 - b. 1 = Yes
- AR. Portfolio/project in Reading?
 - a. 0 = No
 - b. 1 = Yes
- AS. Scoring system provided for Reading portfolio/project (e.g., rubric, scoring key)?
 - a. 0 = No
 - b. 1 = Yes
- AT. Reading curricula?
 - a. 0 = No
 - b. 1 = Yes
- AU. Reading course?
 - a. 0 = No
 - b. 1 = Yes
- AV. Reading tutoring?
 - a. 0 = No
 - b. 1 = Yes
- AW. School District: Linked to EdNA
- AX. District PSSA proficiency policy: Description of what districts do, given materials they sent.
- AY. Policy calls information (based on calls made by PDE personnel)
- AZ. Proficiency information for superintendents (text included in December follow-up letters from Secretary Zahorchak to superintendents)
- BA. Materials sent: List of school district materials received by Penn State Research Team (list included in December follow-up letter to superintendents)
- BB. Return response
 - a. 0 = No, superintendent response was not returned.
 - b. 1 = Yes, superintendent response was returned to follow-up requested by **December 23**, 2008.
 - c. 2 = Yes, superintendent response was returned to follow-up requested by **December 22**, 2008.
- BC. Agreement
 - a. 1 = Yes, District agreed with proficiency information (Column AY), as sent.
 - b. 2 = No, District did not agree with proficiency information (Column AY), as sent.
 - c. 3 = District responded both Yes and No to question of agreement.
 - d. NR (No Response) = District returned letter as requested, but provided NO information to any questions.
- BD. Summary District response: District's amended response to Column AY. (Blank field indicates no amendment.)
- BE. Summary of Part C revisions: District's summary response to questions of whether local assessment is required to graduate, whether retakes are allowed, and the

- degree to which local assessment scores are factored into graduation decisions. (Blank field indicates no additional response.)
- BF. Materials revisions: District's revisions to Column AZ. (Blank field indicates no amendment.)
- BG. Other notes: Notes included by The Penn State Research Team or additional notes supplied by school districts.
- BH. Mathematics alignment of materials to proficiency standards as coded by Mathematics panelists
 - a. 0 = No content areas represented; no alignment of outcomes to standards
 - b. 1 = Some content areas represented; some outcomes are aligned
 - c. 2 = Many to most content areas represented; most outcomes are aligned
 - d. 3 = All content areas represented; all outcomes are aligned
- BI. Reading alignment of materials to proficiency standards as coded by Reading panelists
 - a. 0 = No content areas represented; no alignment of outcomes to standards
 - b. 1 =Some content areas represented; some outcomes are aligned
 - c. 2 = Many to most content areas represented; most outcomes are aligned
 - d. 3 = All content areas represented; all outcomes are aligned
- BJ. Mathematics reported practices as coded by Mathematics panelists...
 - a. 0 =The practice cannot ensure proficiency level in Mathematics is met.
 - b. 1 = The information about practices provided is insufficient to determine proficiency level.
 - c. 2 = There are some good practices reported to determine proficiency level; however, more information is needed.
 - d. 3 = The practices reported represent a valid system of procedures to determine proficiency in Mathematics.
- BK. Reading reported practices as coded by Reading panelists
 - a. 0 =The practice cannot ensure proficiency level in Reading is met.
 - b. 1 = The information about practices provided is insufficient to determine proficiency level.
 - c. 2 = There are some good practices reported to determine proficiency level; however, more information is needed.
 - d. 3 = The practices reported represent a valid system of procedures to determine proficiency in Reading.

BL. Notes

Appendix C: Proficiency Standards Experts Used As Reference

MATHEMATICS

Proficiency Standards
Performance Level Descriptors*

Practical and Real World Problems

- A. Demonstrates understanding of and ability to use different forms of real numbers; uses estimation and operations on real numbers to solve multi-step problems, including problems involving proportional relationships.
- B. Uses formulas to solve problems involving two and three-dimensional measurements of standard and composite geometric shapes; manipulates multi-step formulas; demonstrates the relationships of a change in length and changes in perimeter, circumference, area and volume.
- C. Uses properties and relationships of parts of circles, triangles and quadrilaterals to solve problems; applies the concepts of congruence and similarity in problem-solving settings; describes measures and relationships (perpendicular/parallel with respect to slope) of segments in a coordinate plane.
- D. Writes algebraic expressions and linear and nonlinear equations to describe graphs or patterns; solves problems represented as systems or compound inequalities or quadratic equations; simplifies algebraic expressions in problem-solving situations.
- E. Reads and constructs graphical representations of data; uses box-and-whisker plots to represent data; draws conclusions based on measures of central tendency; uses counting techniques to determine probability; makes predictions based on data sets, probability, graphs and scatter plots.

Material Codes	Proficiency Standards
1=Published test	0 = No content areas represented; no alignment of
2=Individual local test	outcomes to standards.
3=Collection of local tests	1 = Some content areas represented; some
4=Curriculum or course materials	outcomes are aligned.
5=On-line or published tutorial or	2 = Many to most content areas represented; most
self-paced study	outcomes are aligned.
6=Project or portfolio standards or rubric	3 = All content areas represented; all outcomes are
7=Other: Note in comments	aligned.

^{*}http://www.pde.state.pa.us/a and t/lib/a and t/Grade 11 Math PLDs.pdf

READING

Proficiency Standards Performance Level Descriptors*

Grade-level fiction and nonfiction

- A. Applies a variety of strategies to determine meanings of words, including synonyms and antonyms, using context clues and word parts.
- B. Makes inferences, draws conclusions, and generalizes, using textual support; makes within and among text-to-text connections.
- C. Identifies and explains main ideas; summarizes text.
- D. Interprets and analyzes:
 - purpose of text (e.g., narrative, informational)
 - organizational patterns (e.g., sequencing, compare/contrast)
 - relationships among literary elements (character, setting, plot, theme, tone, style, mood, symbolism)
 - use of figurative language (e.g., simile, metaphor), author's style, and point of view.
- E. Interprets and analyzes the use of facts and opinions and analyzes the effectiveness of bias and propaganda in nonfiction.
- F. Describes and analyzes the sequence of steps in a list of directions; analyzes and evaluates graphics and charts.

Material Codes	Proficiency Standards
1=Published test	0 = No content areas represented; no alignment of
2=Individual local test	outcomes to standards.
3=Collection of local tests	1 = Some content areas represented; some outcomes
4=Curriculum or course materials	are aligned.
5=On-line or published tutorial or	2 = Many to most content areas represented; most
self-paced study	outcomes are aligned.
6=Project or portfolio standards or	3 = All content areas represented; all outcomes are
rubric	aligned.
7=Other: Note in comments	

^{*}http://www.pde.state.pa.us/a and t/lib/a and t/Grade 11 Reading PLDs.pdf

Appendix D: Example Proficiency Coding Sheet

Material Codes	Proficiency Standards
1=Published test	0 = No content areas represented; no alignment of outcomes to standards.
2=Individual local test	1 = Some content areas represented; some outcomes are aligned.
3=Collection of local tests	2 = Many to most content areas represented; most outcomes are aligned.
4=Curriculum or course materials	3 = All content areas represented; all outcomes are aligned.
5=On-line or published tutorial or self-paced	
study	
6=Project or portfolio standards or rubric	
7=Other: Note in comments	

ID	Material	Proficiency	Proficiency	Comments
	Code(s)	Standards		
		ABCDE		

Mathematics Proficiency Codes
A=Numerical properties and number relationships
B=Measurement of geometric shapes
C=Use of geometric concepts in problem-solving

D=Algebraic concepts and problem solving E=Data analysis, probability, and statistics

Material Codes	Proficiency Standards
1=Published test	0 = No content areas represented; no alignment of outcomes to standards.
2=Individual local test	1 = Some content areas represented; some outcomes are aligned.
3=Collection of local tests	2 = Many to most content areas represented; most outcomes are aligned.
4=Curriculum or course materials	3 = All content areas represented; all outcomes are aligned.
5=On-line or published tutorial or self-paced study	
6=Project or portfolio standards or rubric	
7=Other: Note in comments	·

ID	Material Code(s)	ABCDEF	Proficiency	Comments
		ABCDEF		

Reading Proficiency Codes

- A. Vocabulary in Context
- B. Inferences, Conclusions, Connections & Support C. Main Idea and Summarize

- D. Interpret & Analyze Style/Structure
 E. Interpret & Analyze Fact/Opinion/Bias
 F. Analyze sequential directions & graphs/charts

Expert	Panel	ID:	

Practices to Meet Proficiency Level

In addition to curriculum and test materials, many school districts provided information about the practices they implement to ensure students' performance level in mathematics and reading is proficient. Below are a series of practices used by the school districts. Practices are the means by which school districts gather evidence to determine proficiency.

Directions: Examine each practice and evaluate it using the following scale:

- 0 = The practice *cannot* ensure proficiency level in Mathematics and/or Reading is met.
- 1 = The information about practices provided is *insufficient* to determine whether proficiency in Mathematics and/or Reading is met.
- 2 = The are **some good** practices reported to determine proficiency level; however, more information is needed.
- 3 = The practices reported represent a *valid* system of procedures to determine proficiency in Mathematics and/or Reading.

	Coursework/Curriculum with or without Testing Practices	Rating Scale Evaluation	Comments	
1	Students must achieve proficiency levels in their required courses <i>AND</i> demonstrate proficiency on district-made tests.	0 1 2 3		
2	Enrollment in a senior-level math or reading class. Students must earn a grade of C or higher in that class based on assignments, quizzes, midterm, final exams, and/or projects.	0 1 2 3		
3	Enrollment in a remediation course using Study Island. Students take the local assessment comprised of past PSSA items. If students do not reach proficiency levels, then tutoring continues. Students retake examination until proficiency levels are met.	0 1 2 3		

4	Completion of laboratory courses using 4Sight	0	1	2	3	
	and Terra Nova assessments as diagnostic tools.					
	Assessment scores determine proficiency level.					
5	One of the following can be used to determine	0	1	2	3	
	proficiency: a) passing a math and/or reading					
İ	proficiency PSSA Coach class; OR, b) Score at					
	least proficient on the 4Sight assessment.					
6	Enrollment in a Study Island remediation course.	0	1	2	3	
	No testing required.					
7	Enrollment in a remediation course where	0	1	2	3	+ <u>.</u>
	students complete released items from the PDE					
	website, PLATO, 4Sight, and the PSSA Coach.					
	No exit test is administered.		,		,	
8	The PLATO learning system is used to help	0	1	2	3	
	students in areas where proficiency levels have					
	not been obtained. The mastery tests are then					
	used to measure proficiency levels. Students must					
	score 80% or higher on <i>EACH</i> mastery test.					· · · · · · · · · · · · · · · · · · ·
9	Completion of a remediation course followed by	0	1	2	3	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \
	a final exam in the Senior Year in Algebra 2 or					
	English 12.					
10	Attendance at a Saturday weekend class for 15	0	1	2	3	
	hours without testing.			.,		•
11	Enrollment in a Princeton Review Course. After	0	1	2_	3	
	class, administration of an alternative assessment.					
	Students can enroll in class and take the					
	assessment up to two times. If not meeting levels					
	of proficiency on second time, diploma is					
L	withheld.					

12	Tutoring and remediation are provided to students	0	1_	2	3	,
	using Measuring Up until teachers believe					
	proficiency levels are met. After tutoring,					
	students take a local, district-made assessment to					
	determine levels of proficiency.					
13	Passing a course in summer school. No testing is	0	1	2	3	
	required.					
14	Enrollment in either a PSSA remediation course	0	1	2	3	
	or use of 4Sight as an alternative assessment if					
	student does not pass the remediation course. The					
	4Sight alternative assessment can be taken up to 3					
	times. To meet the proficiency requirement,	,				
	students must pass this assessment 2 out of 3					1
	times.					·
15	For reading, proficiency levels can be met by	0	1	2	3	
	passing an AP English or English 12 course. For					
	math, proficiency levels can be met by passing an					
	AP Calculus course.					
16	Non-proficient students will be provided a plan to	0	1	2	3.	
	assist them in achieving the standards. Students'			•		
ļ	plans may be adjusted to allow additional					
	instruction time in the areas of deficiency. The					
1	Intermediate Unit 8 Test is then administered					
	after the instructional plan is completed to					
	determine proficiency.	<u></u>				
	Other Practices	Rati	Rating Scale		е	Comments
		Eva	luat	ion		
17	The graduation project.	0	1	2	3	
10	Deport card marks		1	7	2	

Completion of an activity to show good

	citizenship.						
20	Career inventory measure.	0	1	2	3	Π	
21	WebQuest search task activities for reading or math with a final presentation.	0	1	2	3]	
22	Administration of tests for grades 10 or lower.	0	1	2	3	\prod	
23	Total credits earned in mathematics and/or reading that meet school district graduation requirements.	0	1	2	3		

	Specific Testing Practices	Rating Scale Evaluation	Comments
24	Passing midterm and final exams in all Senior-level math and/or English classes.	0 1 2 3	
25	Scores on the PSAT/SAT Quantitative and/or Verbal Subscales	0 1 2 3	
26	Use of a math or reading lab proficiency portfolio. Students must include entries for all proficiency standards. A district-developed rubric is used to determine proficiency levels.	0 1 2 3	
27	Demonstration of proficiency on the Metropolitan Achievement Tests in math and/or reading without test preparation.	0 1 2 3	
28	Demonstration of proficiency using a district- developed local assessment (aligned to standards) that does not include released items of the PSSA.	0 1 2 3	
29	Use of a computerized supervised test built to align with PSSA.	0 1 2 3	
30	Administration of the Stanford Achievement 10 Test. Students can take test as many times as needed.	0 1 2 3	
31	Use of dictionaries on reading local assessments.	0 1 2 3	
32	Administration of the Intermediate Unit 8 test. Students have two opportunities to demonstrate	0 1 2 3	

	proficiency. If they do not pass the second time,					
	then the diploma is withheld.	<u></u>				
33	Inclusion of portfolio entries that contain artifacts	0	1	2	3	
	displaying proficiency. Completion of portfolio is					
	followed by a senior exit interview. Students					
	present their collection of work during the					
	interview. Scripted questions are provided to the	ļ				
	interviewer. Selected items correspond to the					
	standards. The interviewer asks the questions to					
	each student on an individual basis. The interview	ļ.				
	has rubrics and the responses are analyzed by the					
	administrative testing team.					
34	A conditional diploma system. If students do	0	1	2	3	
	demonstrate proficiency level is met in math					
	and/or reading, then they can graduate. They must					
	continue to take district local assessment until					
	proficiency level is met. Students then receive					
<u></u>	official diploma.	<u> </u>	,		·	
35	Use of one of three practice tests from Measuring	0	1	2	3	
	Up.		,		,	
36	Use of standards-based assessments as blocks or	0	1	2	3	
	selected subsets of items where proficiency levels					
	are not met in reading and/or math for specific					•
	performance standards. The blocks of items are					
-	selected and scored by a district assessment team					
	or center.					
37	Administration of Study Island posttests.	0	1	2	3	
	Students can take test as needed until proficiency					
	level is attained.	<u> </u>	,		,	
38	Passing a GED examination.	0	1	2	3	
39	Use of tests developed by states other than	0	1	2	3	
	Pennsylvania. Test items are not released by the					
	school district for practice.					*

40	Use of calculators on mathematics tests (district-made and/or standardized assessments).	0	1	2	3	
41	Completion of a district-developed local multiple- choice assessment in reading and/or math where all items scores have been examined for reliability and validity by the district. The items are secured. The school district administers the test two times each year. Students have two opportunities to demonstrate proficiency level is met.	0	1	2	3	
42	Use of a weighted point rubric for different assessment system batteries where multiple indicators are used. District-developed local assessments have highest point value followed by standardized tests (e.g., Metropolitan Achievement Test) followed by 4Sight Grade 11 Benchmark Tests).	0	1	2	3	

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Appendix F: Expert Panel Evaluation Summaries

Expert Panel Evaluations of the Coding Task

Panelists were asked to rate the extent to which they felt that their professional expertise was respected; that coding materials were well-organized and the process expedient; and that the experience contributed in a meaningful way to their own professional development. Generally, panelists reported a mutual respect among fellow panelists and between panelists and The Penn State Research Team members. While some noted that the variety of materials made the task inherently challenging, they agreed that the boxes of assessments they were required to code were well-organized. Many commented on the benefits to their professional development. One panelist noted that "Learning occurred at an exponential rate for me." Another said, "From the sharing among other professionals to learning about the education policy in the making, I learned a great deal."

Panelists also commented on three aspects of their expert panel experience:

- The process of coding the local assessments (i.e., team process, materials)
- Reactions to materials sent by school districts (i.e., What surprised you?, In positive ways? In ways that concerned you?)
- Overall experience as a panelist

Comments relative to the process were very positive. Panelists found the team process to be especially helpful. They appreciated the collaboration, the compromise, the consensus-building, and the efficiency that such an approach afforded. Many agreed that occasional larger-group interaction complemented the team structure. They commented on the value of training at the outset, periodic regrouping and debriefing, and opportunities to discuss and clarify both the process and their thinking. In spite of this generally effective process, panelists reported that, at times, it was challenging to code consistently in the face of such variety among the local assessment materials.

Participants had strong reactions to the materials they encountered during coding. One reading panelist remarked that, "The scope of materials was staggering." Math panelists described the materials using phrases such as "wide range of assessment," "variance of materials," and "extremes." Reactions to these varied assessments were both positive and negative. Panelists noted that they found "some good assessments" and that some were "thorough and professional." In contrast, they were troubled by "the plethora of recall materials," "the lack of specific district assessments," "a lack of concern for quality and true purpose of assessment," "the basic level of many assessments," and "that my school district does not have an alternative assessment in place."

While panelists reported a positive experience with the coding process and mixed reactions to the materials, there was broad consensus that overall their participation in the expert panel was a valuable one. Reactions included:

• I enjoyed this experience very much. I feel empowered to go back to my school and lead others.

- Very interesting experience! I learned so much and I have come to a new appreciation of the purpose of the PSSA. I know I will view my own assessments very differently from now on.
- Overall, this has been extremely helpful looking at all the different "proficiency" measures used by the state and collaborating with a strong group of educators.
- The overall experience was exceptional. I learned a vast amount of information that I will carry home with me to help not only my district, but my own classroom as well.
- The experience was very valuable and allowed me to develop future ideas based on my analysis. There were many great ideas for addressing performance level descriptors.
- Enjoyed the experience, especially the lively exchange of opinions which on some occasions caused me to change my own original opinion.

Appendix G: Local Assessment Survey

SUMMARY OF LOCAL ASSESSMENT PRACTICES [MM] SCHOOL DISTRICT

The information below reflects your district's submission of local assessments to the Department of Education as well as responses to any follow-up phone calls from Department staff. Please review the summary for accuracy and make any changes or corrections in the space provided. Save your form (using district name) and return to localassess@psu.edu by December 23, 2008. Thank you.

A. MATERIALS SUBMITTED: [MM] B. For last year's (2008) graduating students who did not score proficient or advanced on the 11th grade PSSA (or 12th grade retest), how are the results or outcomes from these assessment materials used to determine proficiency and the awarding of a diploma? DISTRICT RESPONSE: [MM] ☐ Yes, this summary is accurate ☐ I wish to amend and/or correct the summary (please type any changes or corrections in the space below) C. If not addressed by the summary above, please answer the following: 1. Must students pass the local assessment to graduate? ☐ Yes □ No ☐ an alternative assessment or provision remains for non-proficient, regular education (non-IEP) 2. Are students permitted to retake (or resubmit) the assessment in whole or in part to achieve a passing score? ☐ Yes (please identify the number of retakes permitted and describe your district's efforts to protect the security of assessment material) □ No

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3. Are local assessment scores factored in to course or cumulative grades that are used for

graduation purposes?

☐ Yes ☐ No



FACE SHEET 2007 SEP 21 PM 2: 21

WITH THE LEGISLATIVE REFERENCE BUREAU DENTIFICATION

(Pursuant to Commonwealth Documents Law)

Copy below is hereby approved as to Form and legalty. Attorney General	Copy below is hereby certified to be a true and correct copy of a document issued, prescribed or promulgated by:	Copy below is approved as to form and legality. Executive or Independent Agencies
By:	State Board of Education	ynli IZ
(Deputy Attorney General)	(Agency)	Andrew C. Clark SEP 1 9 2009
	DOCUMENT/FISCAL NOTE NO. #006-312	CED
		SEP 1 9 2009
	DATE OF ADOPTION: August 13, 2009	·
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		Deputy General Counse (Chief Counsel), (Independent Agency) (Strike inapplicable title)
	TITLE:	(<u></u>
	(EASCULIVE DIRECTOR, CHAIRMAN OR SECRETARY)	
() Check if applicable Copy not approved.		() Check if applicable. No Attorney General approva Or objection within 30 days After submission.

FINAL REGULATION COMMONWEALTH OF PENNSYLVANIA

22 PA. CODE, CH. 4
ACADEMIC STANDARDS AND ASSESSMENT

Title 22--EDUCATION

STATE BOARD OF EDUCATION

[22 PA. CODE CH. 4]

Academic Standards and Assessment

The State Board of Education (Board) amends Chapter 4 (relating to academic standards and assessment) to read as set forth in Annex A. Notice of proposed rulemaking was published at 38 Pa.B. 2270 (May 17, 2008).

Statutory Authority

The Board acts under the authority of section 2603-B and 2604-B of the Public School Code of 1949 (code) (24 P.S. §§ 26-2603-B and 2604-B).

Background

Over the past 45 years the State Board of Education, through regulation, has set state requirements for instruction, assessment and high school graduation. These policies have changed relatively infrequently when compared to education policy changes made during the same period in other states. The Board first established high school graduation requirements in 1964. It required students to earn 13 academic credits in English, math, science, social studies, health and physical education in grades 10 through 12. Next, as directed by the General Assembly, the Board established ten Goals of Quality Education (1965). The goals described what quality education programs should include. These goals were later revised to provide additional detail and expanded to become twelve Goals of Quality Education (1974). Nineteen years later the Board established 53 student learning outcomes (1993). The outcomes were further expanded into the current curriculum framework, which is based upon 12 sets of state academic standards (1999).

In tandem with it setting graduation requirements, education quality goals, outcomes and academic standards, the Board, through its regulations, developed several assessment strategies starting with the Educational Quality Assessment (EQA), which began in 1970 and continued through 1988. EQA assessed school level performance in reading, writing, math, science, social studies, health, environment, analytical thinking, self concept in school and work opportunities and attitudes. In 1984, a student-based competency testing program, called Testing for Essential Learning and Literacy Skills (TELLS), was added. TELLS was administered through 1991. TELLS was designed to assess reading and math skills attainment for the purpose of targeting state resources to schools to be used to remediate students who were identified by TELLS as performing below grade level.

In 1992 the Pennsylvania System of School Assessment (PSSA) replaced TELLS. The PSSA, like EQA, assessed school-level performance. The PSSA assessed school-level performance in reading, writing and math. In January 1999 the Board promulgated its Chapter 4 regulations. These regulations made two major changes to the PSSA. First was to restructure the PSSA to become a criterion-referenced assessment--that is to measure attainment of the state academic standards. The PSSA was also restructured to provide measurement of both individual student and school-level performance.

With passage of the state Education Empowerment Act (24 P.S. §§ 17-1701-B—1716-B) and federal No Child Left Behind Act of 2001 (Pub.L. No.107-110), the PSSA was extended to assess additional grade levels, include science, and used to hold schools and districts accountable for student academic achievement.

With rare exceptions, each time the Board sought to revise these policies over the past 45 years, some stakeholders vigorously opposed the changes. This has certainly been the case with this regulation, though there is also strong support. The regulation has been endorsed by editorial boards of major daily newspapers, superintendents from districts across the commonwealth, and postsecondary and business leaders who voice concerns about the skill level of recent high school graduates. Ambassador Dan Rooney,

who testified at a public hearing of the Board in Westmoreland County, said
Pennsylvania's young people "must be immediately ready to compete within a global
marketplace by providing the skills, work ethic, and determination that has made the
American workforce the pride of the world." Yet the Central Pennsylvania Workforce
Investment Board noted that the current system of graduation requirements results in
"poor performance, an inability to compete, high employee turnover and lost
productivity, profits and wages."

The current state policy has now been in place ten years, since January 1999. While this policy, together with state, local and federal resources and supports, has produced significant increases in student achievement at the elementary and middle school levels, the policy has not yielded similar gains at the high school level. One-quarter of our students do not graduate from high school on time or at all. More than 40% of those who graduate—more than 50,000 students each year—are awarded diplomas without having passed the State's eleventh-grade reading, writing and math tests. Fewer than half of our high school graduates enroll in college upon graduation and only 37% make it to their sophomore year. One-in-three high school graduates who enroll in a state-owned university or community college require remedial English or math. The cost of the remedial courses at these institutions exceeds \$26.4 million each year. This total does not include remediation costs incurred by students enrolled in the state-related universities or independent colleges.

As requested by the House Education Committee and Independent Regulatory Review Commission, the Department engaged the College of Education at Penn State University to review local assessments used by school districts to determine whether their candidates for high school graduation were proficient in reading, writing and math as required by the Chapter 4 regulations. Of 418 districts that responded to the Secretary's request for copies of their local assessments, Penn State researchers found that only 18 have graduation requirements based on tests that are both aligned with state academic standards and uniformly administered to students.

This problem is widespread across the Commonwealth. Continuing to send students into the world who are inadequately prepared limits economic opportunity for tens of thousands of graduates each year. It limits their ability to earn a living wage; it erodes the Commonwealth's overall economic competitiveness, and reduces our future tax base thereby reducing resources available for vital government services. Every student must graduate from high school with the knowledge and skills that are essential for college and career success if our Commonwealth's economy is to fulfill its promise.

To address this concern, in September 2005 Governor Rendell established the Commission on College and Career Success. Among its charges was to define "college and career ready" in mathematics, English and science; to make specific recommendations for better alignment of academic standards and assessments across the secondary and post-secondary educational sectors, as well as industry in Pennsylvania; and encourage local school districts to adopt a core high school curriculum for all Pennsylvania students.

The Commission delivered its report in December 2006. The Board then conducted outreach activities including six regional public roundtable meetings and one public hearing before it published proposed regulations in the *Pennsylvania Bulletin* in May 2008. The proposed regulations modified the Commission's recommendation to reflect the considerable public input provided to the Board during its public outreach effort.

This proposal, particularly regarding the assessment requirements and changes to high school graduation requirements, caused considerable controversy among stakeholders and state policymakers. The Board received written comments from 938 individuals and organizations during the 30-day public comment period. To provide additional time to consider and discuss the issue, the General Assembly, through Act 61 of 2008 placed a one-year moratorium on the promulgation of final regulations. *See* 24 P.S. § 1-117 (relating to prohibition of certain regulations for the 20082009 fiscal year).

During this period and after the moratorium expired, stakeholders continued to submit comments to the Board, legislators and IRRC.

Over the past year several commentators have questioned the authority of the Board to promulgate regulations that establish statewide high school graduation requirements. Several expressed concern that Section 1611 of the Public School Code of 1949 (Code) vests the authority to award academic degrees with locally elected school boards. However, Article XXVI-B of the Code provides "(b) The Council of Basic Education shall have the power, and its duty shall be to: (2) ... formulate policy proposals in all educational areas not within the purview of higher education, including, but not limited to... (v) admission, attendance, graduation and other separation requirements." The Board's authority stems from the explicit authority given to the Council of Basic Education to formulate policy regarding graduation and other separation requirements. Since its inception in 1963, the State Board of Education has set statewide high school graduation requirements which have included successful completion of a specified number of academic credits including designated courses. These two provisions are not exclusive, rather they work together. The State Board of Education is provided authority to establish "graduation and other separation requirements." The Board, through Chapter 4, has provided local school districts authority to establish graduation requirements consistent with Section 4.24. The Board is now strengthening those requirements. However, local school boards continue to retain authority to award diplomas (academic degrees) to students who meet state and local graduation requirements. Under this regulation local school boards continue to have authority to award diplomas to students who meet state and local graduation requirements.

In early 2009, the chairs of the House and Senate Education Committees brought together stakeholders along with representatives of the Department and Board to determine whether common ground existed on which to develop an agreement.

In addition, Board leadership engaged in additional outreach activities, including holding six additional regional public hearings, meetings with education groups, business

officials, legislators and others that led to the March 2009 announcement of a joint agreement among the Board, the Department and the Pennsylvania School Boards Association (PDE-PSBA-SBE agreement). The new proposal renamed the state end-of-course tests "Keystone Exams," provided for the voluntary use of Keystone Exams, extended flexibility in districts choosing to use local assessments and directed the Department to provide technical guidance to school districts choosing to use local assessments.

In the midst of this effort the Senate approved Senate Bill 281, Printers Number 1074, which would require the General Assembly to approve all future changes to the Board's high school graduation policies, following the Department's approval of a contract to develop Graduation Competency Assessments, model curriculum and diagnostic tools.

During the same period, the Board's chairman, Joe Torsella, pledged to work with the chairs of the Education Committees to develop a common ground regulation. He also promised to provide the Committees an opportunity to review the final regulation before presenting it to the Board for approval or transmitting the regulation for formal action by the Committees. Secretary Zahorchak then sent letters to the Committee chairs committing to place a hold on contracted test development until the final regulation is approved.

Soon after the PDE-PSBA-SBE agreement was announced, a coalition of education and advocacy groups, named the Coalition for Effective and Responsible Testing (CERT), announced its own proposal. Discussions ensued in earnest between Board leadership and CERT, legislators and others. The result was a new proposal based upon combined elements of the PDE-SBE-PSBA agreement and CERT proposal.

The new proposal was publicly announced July 9, 2009. The proposal was transmitted to the majority and minority chairs of the House and Senate Education Committees to provide an opportunity for their review and comment prior to formal

submission of the final regulation. On July 29, 2009, the Senate Education Committee adopted, by a vote of 10 - 1, Senate Resolution 156, which encourages the Board to adopt this final-form regulation to ensure that the Pennsylvania high school diploma provides graduates with the tools to compete in the 21^{st} Century.

In addition to the Senate Education Committee, the proposal has been endorsed by the Chairman of the House Education Committee, the editorial boards of the Philadelphia Inquirer and Pittsburgh Post-Gazette, Pennsylvania Partnerships for Children, and thirty-five superintendents from across the commonwealth who collectively educate more than 300,000 schoolchildren.

Twenty-eight states already require or are in the process of implementing state-prescribed high school comprehensive or end-of-course exams as high school graduation requirements. Twenty-three states require students to take and pass state-mandated exit exams in order to receive high school diplomas. Others, including Missouri, Georgia, North Carolina and South Carolina, include the results of state-mandated end-of-course tests as a percentage of course grades. No other state that has state-level high school graduation requirements provides the kind of flexibility offered to school districts to use locally developed, validated assessments in place of the state assessment that is provided in this regulation.

States have been moving away from the use of comprehensive exams and toward end-of-course tests. According to the Center on Education Policy, 14 states expect to use end-of-course tests by 2015. Policymakers in other states believe using end-of-course exams ensures greater accountability, provides for better assessment of academic content mastery, expands opportunities to inform classroom instruction and can help to better focus professional development needs. Phasing-in the requirements along the provision of instructional tools and supports, including model curriculum and diagnostic tools, will allow schools and teachers to be ready to provide instructional and support activities needed for students to meet the new requirements.

Summary of the Final-Form Rulemaking

The final-form rulemaking makes several significant changes from the proposed regulation published in May 2008.

- 1) Graduation Competency Exams, now called Keystone Exams, are voluntary end-of-course exams, administered to students at the completion of a course. Schools may use one or more Keystone Exams as part of their assessment system. In place of an all-or-nothing test that students must pass in order to qualify for graduation, Keystone Exams, if used, will count for one-third of the final course grade as part of the new high school graduation requirements. Schools may count the Keystone Exam as more than one-third of the final course grade at their discretion. Students who score below-proficient must be provided opportunities to retake the test or modules of the test. Students who score "below basic," which indicates extremely limited knowledge or skills in the content tested, would not receive any points towards their final grade. In addition, students who score below the proficient level would be able to supplement their Keystone Exam score by successfully completing one or more project-based assessments. Points earned through the project would be added to their Keystone Exam score. This would serve as a safeguard to ensure that each student can demonstrate basic knowledge of the subject in order to pass the course.
- 2) The local assessment option is expanded to allow districts to use any type of assessment that can be validated under § 4.52 (relating to local assessment system). Validation must demonstrate that the local assessment is aligned with state standards and that the proficiency level is comparable to that of the state assessment. Additional criteria and procedures for selection of entities approved to perform validations will be recommended by a Local Assessment Validation Advisory Committee.
- 3) Contingent upon approval by the U.S. Department of Education, the four PSSA tests administered in 11th grade and 12th grade retests will be discontinued. They will be replaced by three Keystone Exams (Algebra I, Literature (reading) and Biology). The Algebra I and Literature exams will be mandatory as the measure used to determine Adequate Yearly Progress (AYP) and the Biology exam will be mandatory consistent

- with federal law requiring a high-school level science exam (but will not count for Adequate Yearly Progress (AYP) determinations). Use of these and other Keystone Exams will remain voluntary for purposes of determining course grades and eligibility for high school graduation, as provided in the menu of available options to demonstrate readiness for high school graduation.
- 4) School districts may choose to allow students to "test out" of courses by passing the appropriate Keystone Exam.
- 5) The Secretary is given authority, on a case-by-case basis, to waive one or more provisions to address extenuating circumstances.
- 6) An advisory committee on setting the performance level descriptors and cut scores for Keystone Exams is created. Another advisory committee will advise the Department and provide oversight on validity studies of the Keystone Exams.
- 7) Voluntary diagnostic supports are added to provide schools with tools to help identify whether students are on the proper track for success in meeting the state graduation requirements.
- 8) The Department will provide technical guidance to school districts in developing local assessments that meet the local assessment validation requirements.
- 9) Subject to appropriations enacted by law, the cost to validate local assessments will be equally shared between the school district and Department. Should the Department not be able to meet its share, the local assessment would be considered valid until the district strategic plan is updated.
- 10) State graduation requirements are phased in over time. The class of 2014-15 must demonstrate proficiency in English composition, Literature, Algebra I and Biology. Beginning with the class of 2016-17 students must demonstrate proficiency in English composition and literature; two of the following: Algebra I, Algebra II or Geometry; Biology or Chemistry; and, one of the following: American History, World History or Civics and Government.
- 11) The regulation includes a "grandfather" provision that protects students from having to meet requirements should implementation of Keystone Exams or validated local assessments be delayed.

- 12) The regulation requires the Department to establish procedures to permit districts to request alternative test administration schedules for the Keystone Exams.
- 13) The regulation provides for alternatives and accommodations for students with disabilities and accommodations for students who are gifted and English language learners.

Summary of Public Comments and Responses to Proposed Rulemaking

The proposed rulemaking was published at 38 Pa.B. 2270 (May 17, 2008) and was available on the Department's website at www.pde.state.pa.us. The Board accepted formal written comments during a 30-day public comment period that began upon publication of the proposed rulemaking. The Board received written comments directly from 938 individuals and organizations during the official 30-day public comment period that followed publication of the proposed regulations in the *Pennsylvania Bulletin*. Rather than provide a lengthy listing of the organizations and comments and responses in the preamble, the Board prepared a separate document that outlines the comments and the Board's response. Notification of the availability of this document was sent to each commentator and is posted on the Board's web page on the Department website.

Since publication of the proposed regulation in the May 17, 2008 edition of the *Pennsylvania Bulletin*, the Board has conducted extensive public outreach activities. The Board held six regional public hearings—at which 72 individuals and organizations presented testimony Board leadership met one or more times with the majority and minority leadership of the General Assembly; the chairs of the House and Senate Education Committees; individual members of the House Education Committee; and other members of the General Assembly; the Coalition for Effective and Responsible Testing (CERT); the leadership of the Pennsylvania School Boards Association, Pennsylvania Association of School Administrators, Pennsylvania State Education Association, Pennsylvania Partnerships for Children and scores of individuals. Board leadership presented testimony at several public hearings held by the House and Senate Education Committees. In addition, since May 2008, the Board held six public meetings

where public comment periods were provided. Individuals made comments about this regulation at several meetings.

On August 12, 2009, the Council of Basic Education debated the proposal and received public comments before voting to approve the regulation. On August 13, 2009, the full State Board of Education debated the regulation and again heard public comments prior to voting to approve the regulation.

Comments and testimony received, recommendations and counter proposals were all considered and contributed to the development and drafting of the final regulation.

Effective Date

The final-form rulemaking is effective upon publication in the *Pennsylvania Bulletin*.

Sunset Date

In accordance with its policy and practice regarding regulations, the Board will review the effectiveness of these regulations after 4 years. Therefore, no sunset date is necessary.

Regulatory Review

Under section 5(a) of the Regulatory Review Act (71 P.S. § 745.5(a)), on May 2, 2008, the Board submitted a copy of the notice of proposed rulemaking, published at 38 Pa.B. 2270, to IRRC and the chairpersons of the House and Senate Committees on Education for review and comment.

Under section 5(c) of the Regulatory Review Act, IRRC and the Committees were provided with copies of the comments received during the public comment period, as well as other documents when requested. In preparing the final-form rulemaking, the

Board has considered all comments from IRRC, the House and Senate Committees and the public.

Under section 5.1(j.2) of the Regulatory Review Act (71 P.S. § 745.5a(j.2)), the final-form rulemaking was approved by the House Committee on	
Regulatory Review Act, IRRC met on	, and approved the final-form
rulemaking.	

Contact Person

The official responsible for information on this final-form rulemaking is Mr. Joseph Torsella, Chairman, State Board of Education, 333 Market Street, Harrisburg, PA 17126-0333, (717) 787-3787, TDD (717) 787-7367.

Affected Parties

The final-form rulemaking will affect the students and professional employees of public schools in this Commonwealth.

Fiscal Impact and Paperwork Requirements

The cost to state government for development, administration, scoring and reporting of the Keystone Exams and project-based assessment, state share of local assessment validation costs, together with development of the diagnostic tools, model curriculum and related supports, totals \$7.9 million in 2008-09, \$21.4 million in 2009-10, \$25.7 million in 2010-11, \$29.6 million in 2011-12, \$30.5 million in 2012-13 and \$31.4 million in 2013-14.

The estimated cost to school districts, AVTSs and charter schools includes the local share of validating local assessments. The estimated cost is \$500,000 in 2009-10, \$250,000 in 2010-11, \$250,000 in 2011-12, \$250,000 in 2012-13, and \$250,000 in 2013-14. The cost of providing remediation to students who do not demonstrate proficiency is estimated to average \$600 per student. The costs of providing remediation are offset

through funding allocated through the Basic Education Subsidy, Accountability Block Grant and Education Assistance Program.

Cost savings to state government will result from elimination of the 11th grade PSSA and 12th grade retest. Beginning in 2012-13 and each year thereafter the Commonwealth will save \$5 million annually. School districts, AVTSs and charter schools will experience an estimated cost savings of \$5 million in 2009-10, \$6 million in 2010-11, \$7 million in 2011-12, \$8 million in 2012-13 and \$9 million in 2013-14 resulting from district savings from use of Keystone Exams, model curriculum and instructional diagnostics.

Effective Date

The final-form rulemaking will become effective upon final-form publication in the *Pennsylvania Bulletin*.

Findings

The Board finds that:

- (1) Public notice of the intention to adopt this final-form rulemaking was given under sections 201 and 202 of the act of July 31, 1968 (P. L. 769, No. 240) (45 P. S. §§ 1201 and 1202) and the regulations promulgated thereunder, 1 Pa. Code §§ 7.1 and 7.2.
- (2) A public comment period was provided as required by law and all comments were considered.
- (3) The final-form rulemaking is necessary and appropriate for the administration of the code.

Order

The Board, acting under authorizing statute, orders that:

- (a) The regulations of the Board, 22 Pa. Code Chapter 4, are amended by amending §§ 4.4, 4.24 and 4.51 to read as set forth in Annex A, with ellipses referring to the existing text of the regulations.
- (b) The Chairman will submit this order, 38 Pa.B. 2270 and Annex A to the Office of General Counsel and the Office of Attorney General for review and approval as to legality and form as required by law.
- (c) The Chairman of the Board shall certify this order, 38 Pa.B. 2270 and Annex A and deposit them with the Legislative Reference Bureau as required by law.
 - (d) This order is effective upon publication in the Pennsylvania Bulletin.

Joseph Torsella, Chairman

Annex A

TITLE 22. EDUCATION

PART I. STATE BOARD OF EDUCATION

CHAPTER 4. ACADEMIC STANDARDS AND ASSESSMENT

GENERAL PROVISIONS

§ 4.3. Definitions.

The following words and terms, when used in this chapter, have the following meanings, unless the context clearly indicates otherwise:

GCAs-Graduation competency assessments.

KEYSTONE EXAMS - STATE DEVELOPED END-OF-COURSE EXAMS.

LOCAL ASSESSMENT VALIDATION ADVISORY COMMITTEE – AN ADVISORY COMMITTEE ESTABLISHED BY THE DEPARTMENT COMPOSED OF UP TO TWO REPRESENTATIVES EACH FROM THE DEPARTMENT AND BOARD, FOUR REPRESENTATIVES FROM THE PENNSYLVANIA SCHOOL BOARDS ASSOCIATION AND UP TO FOUR ADDITIONAL MEMBERS WHO ARE JOINTLY SELECTED BY THE COMMITTEE. THE PURPOSE OF THE COMMITTEE IS TO DEVELOP THE CRITERIA FOR THE LOCAL VALIDATION PROCESS AND CRITERIA FOR SELECTION OF APPROVED VALIDATION ENTITIES.

NOCTI – NATIONAL OCCUPATIONAL COMPETENCY TESTING INSTITUTE.

PERFORMANCE LEVEL ADVISORY COMMITTEE – AN ADVISORY COMMITTEE ESTABLISHED BY THE DEPARTMENT TO ASSIST THE DEPARTMENT IN DEVELOPING KEYSTONE EXAM PERFORMANCE LEVEL DESCRIPTORS AND PERFORMANCE LEVEL CUT SCORES. THE COMMITTEE INCLUDES TEACHERS, PRINCIPALS, SCHOOL ADMINISTRATORS, SCHOOL BOARD MEMBERS, HIGHER EDUCATION OFFICIALS, REPRESENTATIVES OF THE U.S. ARMED FORCES, EMPLOYERS AND OTHERS WITH NO LESS THAN ONE-HALF ITS MEMBERS SELECTED FROM NOMINATIONS MADE BY STATEWIDE TEACHERS' UNIONS AND OTHER EDUCATION STAKEHOLDER ORGANIZATIONS.

STATE ASSESSMENT VALIDATION ADVISORY COMMITTEE – AN ADVISORY COMMITTEE ESTABLISHED BY THE DEPARTMENT TO ADVISE IT ON ITS PLANS TO CONDUCT A VALIDITY STUDY OF THE KEYSTONE EXAMS AND REVIEW AND PROVIDE FEEDBACK ON STUDY FINDINGS. THE COMMITTEE IS COMPOSED OF UP TO TWO REPRESENTATIVES EACH FROM THE DEPARTMENT, BOARD, PENNSYLVANIA STATE EDUCATION ASSOCIATION, AMERICAN FEDERATION OF TEACHERS-PENNSYLVANIA AND UP TO FOUR ADDITIONAL MEMBERS WHO ARE JOINTLY SELECTED BY THE COMMITTEE.

§ 4.4. General policies.

- (e) The Department will SHALL provide support to school districts and AVTSs in developing educational programs that enable students to attain academic standards under § 4.12. Department support will include:
- (1) Establishment of a voluntary model curriculum AND DIAGNOSTIC SUPPORTS aligned with State academic standards in each of the content areas assessed by the GCAs KEYSTONE EXAMS under § 4.51(f) (relating to State assessment system).
- (2) Assistance in the development of effective student tutoring, remediation and extended instructional time programs.
- (3) Opportunities for continuing professional education designed to improve instruction in each of the content areas assessed by the GCAs KEYSTONE EXAMS under § 4.51(e)(F).
- (4) UPON REQUEST, TECHNICAL GUIDANCE TO SCHOOL DISTRICTS AND AVTSS (INCLUDING CHARTER SCHOOLS) IN DEVELOPING LOCAL ASSESSMENTS THAT MEET THE REQUIREMENTS OF § 4.24(B)(1)(IV)(B).

CURRICULUM AND INSTRUCTION

§ 4.24. High school graduation requirements.

(a) <u>Requirements through the 2012-2013</u> 2013-2014 <u>school year.</u> Each school district, including a charter school, shall specify requirements for graduation in the strategic plan under § 4.13 (relating to strategic plans). Requirements <u>through the 2012-</u>

- **2013 2013-2014 school year** must include course completion and grades, completion of a culminating project, [and] results of local assessments aligned with the academic standards[. **Students shall demonstrate**] **and a demonstration of** proficiency in reading, writing and mathematics on either the State assessments administered in grade 11 or 12 or local assessment aligned with academic standards and State assessments under § 4.52 (relating to local assessment system) at the proficient level or better to graduate. The purpose of the culminating project is to assure that students are able to apply, analyze, synthesize and evaluate information and communicate significant knowledge and understanding.
- (b) [Beginning in the 2002-2003 school year, students who attain a score at the proficient level on any State assessed discipline administered in grade 10, 11 or 12 shall be granted a Pennsylvania Certificate of Proficiency for that discipline. Students with disabilities who meet the required proficiency level on State assessments with appropriate accommodations shall be granted a Pennsylvania Certificate of Proficiency.] <u>Requirements beginning in the 2013-2014</u> 2014-2015 school year.
- (1) General. Beginning in the 2013-2014 2014-2015 school year, each school district and AVTS, (including charter schools), shall specify requirements for high school graduation in the strategic plan under § 4.13 that, at a minimum, include:
 - (i) Course completion and grades.
- (ii) Completion of a culminating project in one or more areas of concentrated study under the guidance and direction of the high school faculty. The purpose of the project, which may include research, writing, COMPLETION OF A COLLEGE APPLICATION or some other appropriate form of demonstration, is to assure that the student is able to apply, analyze, synthesize and evaluate information and communicate significant knowledge and understanding. Projects may be undertaken by individual students or groups of students.
- (iii) Demonstration of proficiency as determined by the school district or AVTS (including charter schools), in each of the State academic standards not assessed by a State assessment under § 4.51 (relating to State assessment system).
- (iv) Demonstration of proficiency or above in each of the following State academic standards: reading, writing and mathematics (Appendix A); science and technology and environment and ecology (Appendix B), as assessed DETERMINED through any one or a combination of the following:
 - (A) The PSSA administered in 11th grade or 12th grade retest.
- (B) The English composition and literature GCAs, any two mathematics GCAs and either science GCA.

- (C) Locally administered, validated criterion referenced assessments comparable to the GCAs. The local assessments shall be independently and objectively validated by a vendor selected by the school entity from a list of approved vendors published every 5 years by the Secretary after obtaining the approval of the Board.
- (D) Advanced Placement or International Baccalaureate exams that include academic content comparable to the appropriate GCA at a score established by the Secretary to be comparable to the proficient level on the appropriate GCA.
- (v) Demonstration of proficiency or above in the State academic standards in civics and government or history in any one of the social studies GCAs as provided in § 4.51(e)(3), a validated local assessment under subparagraph (iv)(C), or a comparable Advanced Placement or International Baccalaureate exam.
 - (2) Validation of local assessments.
- (i) In developing and selecting the list of approved vendors that may validate locally administered assessments described by paragraph (1)(iv)(C), the Secretary will employ a competitive request-for-qualifications process that includes consideration of:
- (A) Organizational and staff experience in the validation of State and local assessments.
- (B) Appropriate use of generally accepted psychometric statistical methods, practices and analysis.
 - (C) References.
 - (D) Cost.
- (ii) With the concurrence of the Board, the Secretary may issue an additional request for qualifications prior to the end of the 5-year period prescribed by paragraph (1)(iv)(C), if the demand for validation services exceeds the capacity of approved vendors.
- (iii) The school entity shall contract and pay the cost of validating each local assessment.
- (iv) Each local assessment shall be validated by an approved vendor every 5 years. Except for replacement of individual test items of comparable rigor, a new validation is required for any material changes to the assessment or revision of the assessed State academic standards.
- (v) Approved vendors shall include the following criteria when determining whether the local assessment is comparable to the GCAs under § 4.51(e):

- (A) Assessments are internally consistent and replicable.
- (B) Assessments adequately measure and are aligned with the academic content specified in the State academic standards assessed by the GCAs.
- (C) Level of difficulty of assessment items is greater than or equal to those assessed on the GCAs.
 - (D) Proficiency level cut scores are greater than or equal to that of the GCAs.
- (E) Results of local assessments correlate positively and significantly with related National and State criterion referenced assessments.
- (F) Test administration, security and scoring regimes ensure that the integrity and validity of the local assessment is maintained.
- (G) Policy for annually updating assessment items ensures compliance with clauses (A)—(F).
- (A) SUCCESSFUL COMPLETION OF SECONDARY LEVEL COURSEWORK IN ENGLISH COMPOSITION, LITERATURE, ALGEBRA I AND BIOLOGY IN WHICH A KEYSTONE EXAM SERVES AS THE COURSE FINAL EXAM. A STUDENT'S KEYSTONE EXAM SCORE SHALL COUNT AS ONE-THIRD OF THE FINAL COURSE GRADE. A SCHOOL DISTRICT OR AVTS (INCLUDING A CHARTER SCHOOL) MAY, AT ITS DISCRETION, ELECT TO HAVE THE KEYSTONE EXAM COUNT FOR MORE THAN ONE-THIRD OF THE COURSE GRADE. A SCHOOL DISTRICT OR AVTS (INCLUDING A CHARTER SCHOOL), AT ITS DISCRETION, MAY ALLOW STUDENTS WHO SCORE AT THE ADVANCED LEVEL ON A PARTICULAR KEYSTONE EXAM PRIOR TO TAKING THE COURSE TO BE GRANTED COURSE CREDIT FOR THE COURSE WITHOUT HAVING TO COMPLETE THE COURSE.
- (B) LOCALLY APPROVED AND ADMINISTERED, INDEPENDENTLY VALIDATED ASSESSMENTS. LOCAL ASSESSMENTS SHALL BE INDEPENDENTLY AND OBJECTIVELY VALIDATED ONCE EVERY 6 YEARS IN CONJUNCTION WITH SUBMISSION OF THE SCHOOL DISTRICT'S STRATEGIC PLAN, AS PROVIDED IN § 4.13. LOCAL ASSESSMENTS MAY BE DESIGNED TO INCLUDE A VARIETY OF ASSESSMENT STRATEGIES LISTED IN § 4.52(E) (RELATING TO LOCAL ASSESSMENT SYSTEM) AND MAY INCLUDE THE USE OF ONE OR MORE KEYSTONE EXAMS. EXCEPT FOR REPLACEMENT OF INDIVIDUAL TEST ITEMS THAT HAVE A SIMILAR LEVEL OF DIFFICULTY, A NEW VALIDATION IS REQUIRED FOR ANY MATERIAL CHANGES TO THE ASSESSMENT. VALIDATED LOCAL ASSESSMENTS MUST MEET THE FOLLOWING STANDARDS:

- (I) ALIGNMENT WITH THE FOLLOWING STATE ACADEMIC STANDARDS: READING, WRITING (LITERATURE AND COMPOSITION); MATHEMATICS (ALGEBRA I), SCIENCE AND TECHNOLOGY AND ENVIRONMENT AND ECOLOGY (BIOLOGY).
- (II) PERFORMANCE LEVEL EXPECTATIONS AND DESCRIPTORS THAT DESCRIBE THE LEVEL OF PERFORMANCE REQUIRED TO ACHIEVE PROFICIENCY COMPARABLE TO THAT USED FOR THE KEYSTONE EXAMS.
- (III) ADMINISTRATION OF THE LOCAL ASSESSMENT TO ALL STUDENTS, AS A REQUIREMENT FOR GRADUATION, EXCEPT FOR THOSE EXEMPTED BY THEIR INDIVIDUALIZED EDUCATION PROGRAM UNDER SUBSECTION (E) (RELATING TO SPECIAL EDUCATION STUDENTS) OR GIFTED INDIVIDUALIZED EDUCATION PLAN AS PROVIDED IN § 16.32 (RELATING TO GIEP).
- (IV) SUBJECT TO APPROPRIATIONS PROVIDED BY LAW, THE COST TO VALIDATE LOCAL ASSESSMENTS SHALL BE EVENLY DIVIDED BETWEEN THE SCHOOL DISTRICT OR AVTS (INCLUDING A CHARTER SCHOOL) AND THE DEPARTMENT. SHOULD THE DEPARTMENT NOT PROVIDE SUFFICIENT FUNDING TO MEET ITS SHARE, LOCAL ASSESSMENTS SUBMITTED FOR VALIDATION SHALL BE DEEMED VALID FOR THE BALANCE OF THE STRATEGIC PLAN PERIOD UNTIL EITHER A NEW OR MID-POINT UPDATE TO THE STRATEGIC PLAN IS DUE TO THE DEPARTMENT.
- (V) THE DEPARTMENT SHALL ESTABLISH A LIST OF ENTITIES APPROVED TO PERFORM INDEPENDENT VALIDATIONS OF LOCAL ASSESSMENTS IN CONSULTATION WITH THE LOCAL ASSESSMENT VALIDATION ADVISORY COMMITTEE AS PROVIDED IN § 4.52(G).
- (VI) SCHOOL BOARDS SHALL ONLY APPROVE ASSESSMENTS THAT HAVE BEEN DETERMINED TO MEET THE REQUIREMENTS OF THIS SUBSECTION BY AN APPROVED ENTITY PERFORMING THE INDEPENDENT VALIDATION. SHOULD A SCHOOL DISTRICT OR AVTS (INCLUDING A CHARTER SCHOOL) USE A LOCAL ASSESSMENT THAT HAS NOT BEEN INDEPENDENTLY VALIDATED, THE SECRETARY SHALL DIRECT THE DISTRICT TO DISCONTINUE ITS USE UNTIL SUCH TIME THAT THE LOCAL ASSESSMENT IS APPROVED THROUGH INDEPENDENT VALIDATION BY AN APPROVED ENTITY.
- (C) ADVANCED PLACEMENT OR INTERNATIONAL BACCALAUREATE EXAMS THAT INCLUDE ACADEMIC CONTENT COMPARABLE TO THE APPROPRIATE KEYSTONE EXAM AT A SCORE ESTABLISHED BY THE SECRETARY TO BE COMPARABLE TO THE PROFICIENT LEVEL ON THE

APPROPRIATE KEYSTONE EXAM. SUCCESSFUL COMPLETION OF AN ADVANCED PLACEMENT COURSE AND TEST MAY BE USED FOR ONE OR MORE OF THE COURSES REQUIRED FOR GRADUATION WITHOUT THE STUDENT BEING REQUIRED TO TAKE THE RELATED KEYSTONE EXAM. SUCCESSFUL COMPLETION OF AN INTERNATIONAL BACCALAUREATE PROGRAM AND TESTS MAY BE USED FOR ONE OR MORE OF THE COURSES REQUIRED FOR GRADUATION WITHOUT THE STUDENT BEING REQUIRED TO TAKE THE RELATED KEYSTONE EXAM OR LOCAL ASSESSMENT.

- (c) [Beginning in the 2002-2003 school year, students who attain a score at the advanced level of proficiency on any State assessed discipline administered in grade 10, 11 or 12 shall be granted a Pennsylvania Certificate of Distinction for that discipline. Students with disabilities who meet the required proficiency level on State assessments with appropriate accommodations shall be granted a Pennsylvania Certificate of Distinction.] Supplemental instruction. A student who does not score proficient or above on a PSSA administered in 11th grade or GCA administered in any grade shall be provided supplemental instructional support by the student's school entity. The supplemental instructional support must assist the student to attain proficiency in the State academic standards. REOUIREMENTS BEGINNING IN THE 2016-17 SCHOOL YEAR. EFFECTIVE WITH THE 2016-17 SCHOOL YEAR, HISTORY AND CIVICS AND GOVERNMENT (APPENDIX C) ARE ADDED TO THE ACADEMIC STANDARDS LISTED IN SUBSECTION (B)(1)(IV) (RELATING TO REQUIREMENTS BEGINNING IN THE 2014-15 SCHOOL YEAR). REOUIREMENTS LISTED IN SUBSECTION (B)(1)(IV)(A) SHALL INCLUDE A DETERMINATION OF PROFICIENCY IN BOTH ENGLISH COMPOSITION AND LITERATURE: TWO OF THREE MATHEMATICS (ALGEBRA I, GEOMETRY, ALGEBRA II), ONE OF TWO SCIENCES (BIOLOGY, CHEMISTRY), AND ONE OF THREE SOCIAL STUDIES (AMERICAN HISTORY, CIVICS AND GOVERNMENT, WORLD HISTORY).
- (d) <u>Strategic plan.</u> Each school district, including a charter school, shall describe in its strategic plan under § 4.13 how its planned instruction is designed to prepare students to meet the requirements of [subsection] <u>subsections</u> (a) <u>and (b)</u>.
- (e) <u>Special education students</u>. Children with disabilities who satisfactorily complete a special education program developed by an Individualized Education Program team under the Individuals with Disabilities Education Act and this part shall be granted and issued a regular high school diploma by the school district of residence. This subsection applies if the special education program of a child with a disability does not otherwise meet [all] <u>the</u> requirements of this chapter. [Children with disabilities who meet the required proficiency level on State assessments shall be granted the appropriate Certificate of Proficiency or Distinction.]

- (f) <u>Demonstration of proficiency</u>. [The Department will develop Pennsylvania Certificates of Proficiency and Distinction for each of the State assessed disciplines. The Department will distribute the certificates to each school district in sufficient quantity for the school district to issue to its students who have earned the Certificates. School districts shall enter student names on the appropriate certificate as described in subsections (b) and (c) and present the certificates to the student.] For purposes of this section, students shall be deemed proficient in the State-assessed standards whenever they demonstrate proficiency through any of the assessment options in subsection (b)(1)(IV), regardless of the student's grade level or age.
- (g) [The Department will develop, or cause to be developed, Certificates of Proficiency so as to acknowledge and recognize those students who attain a level of at least proficient in all State assessed disciplines. The certificates must be distinctive and differentiated from the certificates described in subsection (f). The certificates shall be awarded to students as appropriate in lieu of those prescribed in subsection (b).
- (h) The Department will develop, or cause to be developed, Certificates of Distinction so as to acknowledge and recognize those students who attain a score at the advanced level of proficiency in all State assessed disciplines. The certificates must be distinctive and differentiated from the certificates described in subsection (f). The certificates shall be awarded to students as appropriate in lieu of those prescribed in subsection (c).
- (i)] <u>Transcripts.</u> Beginning in the 2003-[04] <u>2004</u> school year, PSSA scores in each assessed discipline, <u>and beginning in the 2013-2014</u> 2014-2015 <u>school year, GCA</u>

 KEYSTONE EXAM <u>or validated local assessment scores</u>, shall be included on student transcripts and may be released only with the permission of the student and parent or guardian, or the student only if the student is 18 years of age or older.
- [(j)] (h) Release of scores. This section does not allow for the release of individual student PSSA or GCA KEYSTONE EXAM scores to the Department or other Commonwealth entities in accordance with § 4.51(c) [(relating to State assessment system)].
- (i) <u>Supplemental instruction</u>. BEGINNING IN THE 2011-2012 SCHOOL YEAR, A student who does not score proficient or above on a PSSA administered in 11th grade or GCA administered in any grade DEMONSTRATE PROFICIENCY IN ANY OF THE 10 COURSES OR LOCALLY VALIDATED ASSESSMENTS SPECIFIED IN SUBSECTIONS (B) AND (C) shall be provided OFFERED supplemental instructional support by the student's school entity. The supplemental instructional support must assist the student to attain proficiency in the State academic standards.

- (J) WAIVERS. THE SECRETARY MAY WAIVE ONE OR MORE PROVISIONS OF THIS SECTION ON A CASE-BY-CASE BASIS FOR GOOD CAUSE. WAIVERS SHALL BE BASED UPON RECEIPT OF A WRITTEN REQUEST FROM THE CHIEF SCHOOL ADMINISTRATOR. WAIVERS MAY BE GRANTED TO ACCOMMODATE STUDENTS WHO EXPERIENCE EXTENUATING CIRCUMSTANCES (INCLUDING SERIOUS ILLNESS, DEATH IN IMMEDIATE FAMILY, FAMILY EMERGENCY, FREQUENT TRANSFERS IN SCHOOLS, OR TRANSFER FROM AN OUT-OF-STATE SCHOOL IN 12TH GRADE).
- (K) TRANSITION. TO EFFECT SUCCESSFUL TRANSITION BETWEEN REQUIREMENTS OUTLINED IN SUBSECTIONS (A) AND (B) (RELATING TO REQUIREMENTS THROUGH THE 2013-14 SCHOOL YEAR; AND REQUIREMENTS BEGINNING IN THE 2014-15 SCHOOL YEAR), STUDENTS WHO WILL GRADUATE IN THE 2014-2015 SCHOOL YEAR OR THEREAFTER, WHO SUCCESSFULLY COMPLETE COURSES WITH ACADEMIC CONTENT ASSESSED UNDER SUBSECTIONS (B) OR (C) (RELATING TO REQUIREMENTS BEGINNING IN THE 2014-15 SCHOOL YEAR; AND REQUIREMENTS BEGINNING IN THE 2016-17 SCHOOL YEAR) FOR WHICH KEYSTONE EXAMS OR LOCAL VALIDATED ASSESSMENTS WERE NOT AVAILABLE AT THE TIME THE COURSE WAS COMPLETED, SHALL BEEN DEEMED PROFICIENT FOR PURPOSES OF THIS SECTION.

ASSESSMENT

§ 4.51. State assessment system.

- (b) [State assessment] All PSSA instruments administered in reading, writing and mathematics in grades 5, 8 and 11 will be standards-based and criterion referenced and include essay or open-ended response items in addition to other item formats. The proportion of type of items will vary by grade level. Neither State assessments nor academic standards under § 4.12 may require students to hold or express particular attitudes, values or beliefs. The Department will make samples of assessment questions, instrument formats[,] and scoring guides available to the public after each administration of State assessments. The criteria for judging performance on State assessments are as follows:
- (1) Performance on **[State]** <u>PSSA</u> reading assessments shall be demonstrated by students' responses to comprehension questions about age-appropriate reading passages and by their written responses to in-depth comprehension questions about the passages.
- (2) Performance on **[State]** <u>PSSA</u> mathematics assessments shall be demonstrated by students' responses to questions about grade-appropriate content and by the quality of their responses to questions that require a written solution to a problem.

- (3) Performance on [State] <u>PSSA</u> writing assessments shall be demonstrated by the quality of students' written compositions on a variety of topics and modes of writing.
- (4) Performance on PSSA science assessments shall be demonstrated by students' responses to grade appropriate content and by the quality of their responses to questions that demonstrate knowledge of each category of the standards for science and technology and environment and ecology.
- (5) Levels of proficiency shall be advanced, proficient, basic and below basic. In consultation with educators, students, parents and citizens, the Department will develop and recommend to the Board for its approval specific criteria for advanced, proficient, basic and below basic levels of performance.
- (c) The Department will develop or cause to be developed [State] PSSA assessments based on academic standards in mathematics, reading [and], writing and science under § 4.12 and contained in Appendix A. In developing assessments, the Department will consult with educators, students, parents and citizens regarding the specific methods of assessment. To ensure that information regarding student performance is available to parents and teachers, State assessments developed under this section [shall] must include student names. Individual test results shall be used in planning instruction only by parents, teachers, administrators and guidance counselors with a need to know based upon local board policy on testing and in reporting academic progress. The Department or other Commonwealth entities are prohibited from collecting individual student test scores, and may only collect aggregate test scores by school and district.

- (e) Students not achieving at the proficient level in the administration of State assessments in grade 11 shall be provided one additional opportunity in grade 12 to demonstrate a proficient level on **[State]** the PSSA assessments.
- (f) The Department will develop or cause to be developed GCAs KEYSTONE EXAMS as follows:
- (1) Three assessments aligned with the mathematics standards, contained in Appendix A, that assess the academic content traditionally included in algebra I, algebra II and geometry courses.
- (2) Two assessments aligned with select reading, writing, speaking and listening standards, contained in Appendix A, that assess academic content traditionally included in high school literature and composition courses.
- (3) Three assessments aligned with select history and civics and government standards, contained in Appendix C, that assess content traditionally included in high school level American history, world history and civics and government courses.

- (4) Two assessments aligned with select standards for science and technology and environment and ecology, contained in Appendix B, that assess academic content traditionally included in high school level biology and chemistry courses.
- (5) GCAs shall be offered at least 3 times each year, once each in the fall, spring and summer. GCAs shall be reviewed and scored so that the scores for candidates for graduation are provided to schools no later than 10 calendar days prior to graduation. IF A KEYSTONE EXAM IS OFFERED AS A GRADUATION REQUIREMENT, IT SHALL BE OFFERED AT LEAST 3 TIMES EACH YEAR: ONCE EACH IN THE FALL, SPRING AND SUMMER. KEYSTONE EXAMS SHALL BE ADMINISTERED, REVIEWED AND SCORED SO THAT THE SCORES FOR CANDIDATES FOR GRADUATION ARE PROVIDED TO SCHOOLS NO LATER THAN 10 CALENDAR DAYS PRIOR TO GRADUATION. A SCHOOL DISTRICT OR AVTS (INCLUDING A CHARTER SCHOOL) MAY REQUEST THAT THE DEPARTMENT APPROVE ALTERNATIVE TEST ADMINISTRATION AND SCORING TIMEFRAMES. THE DEPARTMENT SHALL PUBLISH GUIDELINES AND PROCEDURES FOR APPROVING ALTERNATIVE TEST ADMINISTRATION AND SCORING TIMEFRAMES ON ITS WEBSITE. THE GUIDELINES SHALL PROVIDE FOR APPROVAL OF ALL REQUESTS UNLESS SUCH APPROVAL IS CONTRARY TO STANDARDS OF TEST VALIDITY AND SCORING.
- (6) Students shall be permitted to retake any GCA KEYSTONE EXAM, or GCA KEYSTONE EXAM module, in which the student did not score proficient or above at the next available testing date.
- (7) Each GCA may KEYSTONE EXAM SHALL be designed into IN modules that reflect distinct, related academic content that is common to the traditional progression of coursework to allow students who do not score proficient or above to retake those portions of the test in which they did not score proficient or above.
- (8) KEYSTONE EXAMS SHALL BE SCORED ON A 100-POINT SCALE. WHEN USED TO DETERMINE PROFICIENCY TO MEET HIGH SCHOOL GRADUATION REQUIREMENTS, A KEYSTONE EXAM SHALL COUNT FOR ONE-THIRD OF THE FINAL COURSE GRADE. A KEYSTONE EXAM MAY BE COUNTED FOR MORE THAN ONE-THIRD OF THE FINAL COURSE GRADE AT THE SOLE ELECTION OF THE SCHOOL DISTRICT OR AVTS (INCLUDING A CHARTER SCHOOL). A STUDENT MUST SCORE ADVANCED, PROFICIENT OR BASIC ON A KEYSTONE EXAM TO RECEIVE POINTS FROM THE EXAM TOWARD HIS FINAL COURSE GRADE.
- (9) LEVELS OF PROFICIENCY ON KEYSTONE EXAMS SHALL BE SET AT THE ADVANCED, PROFICIENT, BASIC AND BELOW BASIC LEVELS. IN CONSULTATION WITH THE PERFORMANCE LEVEL ADVISORY COMMITTEE, THE DEPARTMENT SHALL DEVELOP AND RECOMMEND TO THE BOARD FOR ITS APPROVAL, PERFORMANCE LEVEL

DESCRIPTORS AND PERFORMANCE LEVEL CUT SCORES FOR THE KEYSTONE EXAMS AND ANY ALTERNATIVE ASSESSMENTS DEVELOPED TO ASSESS STUDENTS WITH DISABILITIES AS PERMITTED BY THE NO CHILD LEFT BEHIND ACT OF 2001 (PUB. L. NO. 107-110, 115 STAT. 1425). THE DEPARTMENT SHALL USE WIDELY-ACCEPTED PSYCHOMETRIC PROCEDURES TO ESTABLISH THE CUT SCORES. CUT SCORES SHALL BE PRESENTED AT A PUBLIC MEETING OF THE BOARD FOR ITS REVIEW AT LEAST 2 WEEKS PRIOR TO SCHEDULED BOARD ACTION ON THE CUT SCORES.

- (8) (10) The Department will provide guidance to school entities as to the appropriate accommodations school entities shall provide to students with disabilities, STUDENTS WHO ARE GIFTED and English language learners, when appropriate.
- (11) KEYSTONE EXAMS IN THE FOLLOWING SUBJECTS WILL BE DEVELOPED BY THE DEPARTMENT AND SHALL BE MADE AVAILABLE FOR VOLUNTARY USE BY SCHOOL DISTRICTS AND AVTSS (INCLUDING CHARTER SCHOOLS) IN ACCORDANCE WITH THE FOLLOWING SCHEDULE:

SCHOOL YEAR 2010-11 ALGEBRA I

LITERATURE

BIOLOGY

FALL 2011

ENGLISH COMPOSITION

ALGEBRA II

FALL 2012

GEOMETRY

UNITED STATES HISTORY

FALL 2016

CHEMISTRY

CIVICS AND GOVERNMENT

WORLD HISTORY

(12) THE DEPARTMENT SHALL SEEK TO HAVE THE KEYSTONE EXAM SYSTEM APPROVED AS THE HIGH SCHOOL LEVEL SINGLE ACCOUNTABILITY SYSTEM UNDER THE NO CHILD LEFT BEHIND ACT OF 2001 (PUB. L. NO. 107-110, 115 STAT. 1425). UPON APPROVAL BY THE U.S. DEPARTMENT OF EDUCATION, THE ALGEBRA I AND LITERATURE

EXAMS WILL BE USED TO DETERMINE ADEQUATE YEARLY PROGRESS AT THE HIGH SCHOOL LEVEL. THE BIOLOGY KEYSTONE EXAM WILL BE USED AS THE HIGH SCHOOL LEVEL SCIENCE ASSESSMENT, WHICH IS NOT A FACTOR IN DETERMINING ADEQUATE YEARLY PROGRESS. SHOULD THE KEYSTONE EXAM SYSTEM RECEIVE APPROVAL AS THE HIGH SCHOOL LEVEL ACCOUNTABILITY MEASURE, SCHOOL DISTRICTS AND AVTSS (INCLUDING CHARTER SCHOOLS) SHALL ADMINISTER THE LITERATURE, ALGEBRA I AND BIOLOGY EXAMS AS END-OF-COURSE TESTS IN THE GRADE LEVEL IN WHICH STUDENTS COMPLETE THE RELEVANT COURSEWORK.

(13) THE 11TH GRADE PSSA EXAMS IN READING, WRITING, MATH AND SCIENCE SHALL BE DISCONTINUED UPON IMPLEMENTATION OF THE KEYSTONE EXAMS AS THE APPROVED ASSESSMENT SYSTEM UNDER SECTION 1111(B)(2)(C) OF THE NO CHILD LEFT BEHIND ACT OF 2001 (20 U.S.C.A. § 6311(B)(2)(C)).

[(f)] (g) * * *

[(g)] (h) * * *

[(h)] (i) * * *

[(i)] (j) * * *

[(j)] (k) * * *

- (L) STATE ASSESSMENT VALIDATION ADVISORY COMMITTEE. THE DEPARTMENT SHALL ESTABLISH A STATE ASSESSMENT VALIDATION ADVISORY COMMITTEE. THE COMMITTEE SHALL ADVISE THE DEPARTMENT ON ITS PLANS TO CONDUCT THE VALIDITY STUDY AND SHALL REVIEW AND PROVIDE FEEDBACK ON ITS FINDINGS. THE DEPARTMENT AND THE STATE ASSESSMENT VALIDATION ADVISORY COMMITTEE WILL INVESTIGATE THE USE OF A CERTIFICATE BASED ON INDUSTRY APPROVED STANDARDS AND PERFORMANCE ON A NOCTI EXAM AS AN ALTERNATIVE PATHWAY TO GRADUATION AND SHALL MAKE A REPORT AND RECOMMENDATION TO THE BOARD WITHIN ONE YEAR OF THE EFFECTIVE DATE OF THIS REGULATION.
- (M) VALIDITY STUDY OF KEYSTONE EXAMS. AT LEAST ONCE EVERY FIVE YEARS, THE DEPARTMENT SHALL CONTRACT WITH A QUALIFIED, INDEPENDENT RESEARCH ORGANIZATION TO PERFORM A VALIDITY STUDY OF THE KEYSTONE EXAMS USING GENERALLY ACCEPTED EDUCATION RESEARCH STANDARDS. THESE STUDIES SHALL

DETERMINE, AT A MINIMUM, THE DEGREE TO WHICH THE KEYSTONE EXAMS AND PERFORMANCE LEVEL CUT SCORES ARE VALID FOR THE PURPOSES FOR WHICH THEY ARE USED; ALIGNED WITH STATE ACADEMIC STANDARDS; ALIGNED WITH PERFORMANCE LEVELS OF OTHER STATES; INTERNATIONALLY BENCHMARKED; AND PREDICT COLLEGE AND CAREER SUCCESS. IN ADDITION, ALL KEYSTONE EXAMS, PERFORMANCE LEVEL DESCRIPTORS AND CUT SCORES WILL BE SUBJECT TO THE BEST AVAILABLE FORMS OF CONTENT, CRITERION AND CONSEQUENTIAL VALIDATION.

- (N) SUPPLEMENT KEYSTONE EXAM SCORE. IF A STUDENT IS UNABLE TO MEET THE REQUIREMENTS IN § 4.24(B)(1)(IV)(A) (RELATING TO HIGH SCHOOL GRADUATION REQUIREMENTS), HE MAY SUPPLEMENT HIS KEYSTONE EXAM SCORE THROUGH SATISFACTORY COMPLETION OF A PROJECT-BASED ASSESSMENT AS PROVIDED IN SUBSECTION (O). POINTS EARNED THROUGH SATISFACTORY PERFORMANCE ON ONE OR MORE PROJECT MODULES RELATED TO THE KEYSTONE EXAM MODULE OR MODULES ON WHICH THE STUDENT SCORED BELOW PROFICIENT SHALL BE ADDED TO THE STUDENT'S HIGHEST KEYSTONE EXAM SCORE. THE TOTAL SHALL COUNT AS ONE-THIRD OF A STUDENT'S FINAL COURSE GRADE, AS PROVIDED IN SUBSECTION (F)(8).
- (O) PROJECT-BASED ASSESSMENT. THE DEPARTMENT SHALL DEVELOP A PROJECT-BASED ASSESSMENT SYSTEM THAT IS ALIGNED WITH THE MODULES FOR EACH OF THE TEN KEYSTONE EXAMS. THE PROJECT-BASED ASSESSMENT SYSTEM SHALL BE ADMINISTERED BY SCHOOLS AND SCORED BY REGIONAL PANELS COMPOSED OF TEACHERS, PRINCIPALS AND CURRICULUM SPECIALISTS ASSEMBLED BY THE DEPARTMENT. THE REGIONAL REVIEW PANELS SHALL SCORE STUDENT PROJECTS ACCORDING TO SCORING PROTOCOLS AND RUBRICS DEVELOPED BY THE DEPARTMENT. STUDENTS MAY QUALIFY TO PARTICIPATE IN ONE OR MORE PROJECT-BASED ASSESSMENTS IF THE STUDENT HAS MET ALL OF THE FOLLOWING:
- (A) HAS TAKEN THE COURSE.
- (B) WAS UNSUCCESSFUL IN ACHIEVING A SCORE OF PROFICIENT ON THE KEYSTONE EXAM AFTER AT LEAST TWO ATTEMPTS.
- (C) MET THE DISTRICT'S ATTENDANCE REQUIREMENTS FOR THE COURSE.
- (D) HAS PARTICIPATED IN A SATISFACTORY MANNER IN SUPPLEMENTAL INSTRUCTIONAL SERVICES UNDER § 4.24(I).

§ 4.52. Local assessment system.

(H) LOCAL ASSESSMENT VALIDATION ADVISORY COMMITTEE. THE DEPARTMENT SHALL ESTABLISH A LOCAL ASSESSMENT VALIDATION ADVISORY COMMITTEE. THE COMMITTEE SHALL DEVELOP THE CRITERIA FOR THE LOCAL VALIDATION PROCESS AND CRITERIA FOR SELECTION OF APPROVED VALIDATION ENTITIES AS PROVIDED IN § 4.24(B)(1)(IV)(B). THE DEPARTMENT, IN CONSULTATION WITH THE COMMITTEE, SHALL ESTABLISH A LIST OF ENTITIES APPROVED TO PERFORM INDEPENDENT VALIDATIONS OF LOCAL ASSESSMENTS. THE COMMITTEE SHALL SUBMIT ITS RECOMMENDATIONS FOR APPROVAL OR DISAPPROVAL TO THE BOARD. THE DEPARTMENT SHALL POST THE APPROVED CRITERIA, SELECTION CRITERIA AND LIST OF APPROVED ENTITIES ON ITS WEB SITE.

RESPONSE TO COMMENTS 22 PA CODE CHAPTER 4

Academic Standards and Assessment High School Graduation Requirements State Assessment

The State Board of Education published proposed regulations in the May 17, 2008 edition of the Pennsylvania Bulletin, which initiated a formal 30-day public comment period. During this period, 938 comments were submitted to the Board. (The Board received an additional 93 comments after the 30-day public comment period.) A substantial portion of the comments were form letters sent via email.

In an effort to gather additional stakeholder input, the Board held six regional public hearings in February and March 2009. Seventy-two individuals representing diverse communities and constituencies (including school districts, businesses, employer organizations, workforce investment boards, institutions of higher education, and statewide associations) presented testimony. The one-year Act 61 moratorium on the development of regulations governing graduation requirements provided an unprecedented opportunity for public comment and engagement.

This document provides a summary of the comments received and the Board's response to the comments.

I. Record of Comment

In chronological order, the following individuals provided comment to the Board during the 30-day public comment period:

Patty Crandall, Janine Massenburg, John Lester, Matt Luchansky, Barb Keefer, Carol Martin, Marisol Ocasio, Robin Moye, Carol Goertzel, Aldine Coleman, Robert Cicco, Richard Scaglione, Christina Reynolds, Stephanie Zangwill, Kim McClure, Millie Berg, Pat Bittner, Bronwyn Carlson, Doreen Damskov, Wayne Jones, Natasha Farrell, Mary Lou Bitar, James Nelson, Patricia Giles, Nancy Hagenbach, Beverly Duncan, Barbara Tokatz, Tameka Rice, Jennifer Wolford, Julie Prey-Harbaugh, Charlotte Pletcher, Marsha Brubaker, Joanne Wisniewski, Arlette Lantz, Dana Songer, Thistle Elias, Nikia Still, Debra Haldeman, Ronald Evans, Jacquelyn Gundersen, Letty McKinney, Ida H. Page, Nancy Boyer, Diane Caviston, Cindy Wolfe, Tessi Melchior, Minturn Smith, Yesenia Ortiz-Flores, Angela Claar, Rae Johnson-Bundy, Devina Dukes, Donna Buchanan, Donna Jarmulowski, Sandra Kaufmann, Monica Walker, Eileen Zarski, Shana Smith, Melissa Dickerson, Amy Brown, Alison Williams, Ann Marie Adonizio, Gabrielle Smith, Marie Conti, Kathy Felty, Jen Lydic, Kathy Stennett, Janice Long, Anne Martin, Colleen Stulak, Margie Sebastiani, Linda Martin, Michele Nuss, Sue Ellen Masters, Susan Howell, Marjie Mogul, S. McKennedy, Elizabeth Jones, Julie Clayton, Shalynda Morton, Mattie Kendrick, Erica Heller, Robert E.

Feir, Kathy Myers Vickie Kolakowski, Sade Davis, Bob Long, Sharon Mast, Mary Ann Pease, Jessica Lees, Laura Adams, Georgine Joyce, Renee Jamison, Marcy Bacine, Judi Anderson, Rodney A. Erickson, Paul Vincent Riley, Jr., Peter Butler, Kenneth A Noll, Tameka Rice, Eileen McAliney, Jennifer Wessels, Mary Ann Stabile, Tom Snyder, Kate Stone Reis, Nancy Brown, Donna Koons, Anne Marie Fletcher-Moore, Jennifer Conrad, Christine Connolly, Dona B. Redmond, Stan Johnson, Suzanne Sirkin, Lawrence A. Feinberg, Judith Evangelista, Ed & Kathleen Crenny, Sarah Jean, David M. Rackow, Robin McConnell, Andrea Rountree, Amy McCue, Gerry Jaffe, Christine Broome, Dehlia & Ronald DeLuca, Shauna M. D'Alessandro, Scott Schappell, Deborah Miller, Lisa Winigrad, Deby & William Ross, Stacy Stone, Nanette Chappelear, Patty Pawlow, Linda Barber, Merraine B. Rein, Mark & Kate McCanney, Susan Drennan, Suzanne V. Domenick, Lisa McDungall, Tara L. Pacca, Mathieu Turpault, Sarah Stephenson Keyes, Jodi Monster, Laura Hutton, Laura Woyak, Sandrine Turpault, Marci Tierney, Nancy & James Margolis, Karen M. Cruickshank, Renee Mindek, Robert & Margaret Winters, Amy George, Claire Witzleben, Rebecca Wein, Curtis & Kerry Nelson, Jeanne & Don Braun, Toni Mullen, Sam & Dawn Morgan, Dena Cara, Nicole Blagden, Mary Landers, Robin Murphy, Kevin Horan, Jennifer Horan, Patricia A. & Andrew Hino, Lisa Buraks, Daniel J. & Martha M. Winters, Randy & Krista Ross, Karen Zelikoff, Patricia A. Genovese, Janet Wolfe, Paige Skelly, Dolores Howry, Evelyn Shreve, Gwenn Mascioli, Jennifer Au, Lawrence A. Husick, Barbara McGann, Gregory & Laura Johnson, Sarah W. Ahmann, Cathleen Duffy, Jean Donahue, Suzanne Henning, Bob Bold, Kym Guy, Chuck Ballard, Marcie Lightwood, Megan King, Barbara Kerwin, Kathy Clark, Julie Wang, Karen Karp, Joe Alban, Hannah Harbison, Frank & Patricia Lanahan, Todd & Jana Walker, Mickey Bradley, Colleen Faustino Small, Syd Ness, Gwynn-Samblas Family, Guadalupe Cintron, Dampman123, Sharon Chidester, Mary Lou Haughney, Kimberly Corbi, Connie Morak, R. Griffith, Debora DeVaughn, Leanne & Daryn Rush, Audrey Ho, Tabatha Amereihn, Mary Putt, Jeanne Choplick, Tameka Rice, Brian Wanbaugh, Annemarie Carl, Marion Rowland, Dr. Stephen Jones, Anita Street, Lois Horn, Sandie Nicholson, Richard L. Cohen, Lois Hann, Brian Pollak, Charles E. Barrett, Sheryl Loos, Wynne Wilking, Allison MacGahan, Brian & Deborah Bodo, KBRJ, Natalye Delegal, Don Bell, Debra J. Babirad, Roseann B. Nyiri, Michael J. Masko, Maddox B. Stokes, Harry C. Mathias, Jr., Alan T. Vandrew, Bonnie Karwat, Joan Benso, Eileen Hoban, Nancy J. Zeller-Landau, Warren C. Bulette, Linda Bartleson, Mary Ann Bentz, Maria Delany, Carol Aubin, Mary Davidson, Gloria del Vecchio, Lynda Spencer, Kris Koseski, Cath S, Don Ivey, Cindy Arbaugh, Raymond Ostrowski, Marybeth Sullivan-Rose, Cheri Spera, Stephanie Thibault, Beth Pedersen, Jianchao Li, Rita Patchan, Heidi Nothdurft, Carol Detweiler, Gerry L Turner, Thomas E. Colman, Kelly Bistline, Danyll S. Lockett, Jackie Brautigam, Kathy Dearborn, Linda A. Martin, Eileen B. Abruzzi, Marcy Bergin, Carol Diehl, Carolyn A. Boice, Shauna M. D'Alessandro, Jeremy Groff, Lisa Loomis, Michele and Stephen Loose, Margaret F. Brown, Elliott Seif, Pam Freidhoff, Pamela M. Mase, Michele B. Campbell, William J. Bartle, Tara Purcell, Nadine Deardorff, Diane Henry, Donna Ross, Jeanne Hohlweg, Jackie

Clouser, Ray G. Shaffer, Kathryn L. Orban, Jeremy Barnes, Beverly A. Baynes, Sandra Lane, Paul O. Cerrar, William C. Brock, Holly & David Montanari, Donald G. Warner, Martin McGurrin, Twila Good, Jeanette Peterson, Robin Wilson, Virginia Wieder, Cathi Berkey, Iolanda Spruhde, Diane P. Barber, Elizabeth Zellner, Karen S. Downie, Lauren Kraske, Lorenzo Canizares, Brenda Rios, Cynthia Boyce, Phil Waber, Lisa Feil, Monty Neil, Jennifer DiRocco. Cheryl Rose, Frank Tylutki, Mrs. White, Kristine Vivirito, Jamie A. Caffier, Ron Tyson, Diane Basty, Pauline A. Bachtle, Karen Nash, Sean Hackett, Karen G. Cummings, Terry Cook, Karlene Gutierrez, Blair Hyatt, Wendi Folk, Janet M. Schroeder, Jack Norris, Moira Singer, Brian M. Small, James A. Budzilek, Cathy Smyth, Fred Baca, Kelly Peltier, Jean Brenner, Kimberly Buch, Laura Brenner-Scotti, Jean Leiboff, Lynne Thompson, Diane Hartsough, Wilbur E. Wolf, Jr., Diann Metal, William F. Brenner, Cheryl Barnes, Randall Holt, Pamula A. Lenz, Francis D. Burke, Jr., Kim DeStefano, Allison W. Cutler, Anna Sabol, Mary Farence, Rebecca Schwindeman, Patricia Ciarlone, Nadia Prisuta, Jean Twardzik, Minne Porter, Katherine Keirsey, Morrice & Jennifer Taylor, Crystal Johnson Goree, Mary Ann Ohlert, Michael F. Dunn, Jr., Erin Shine, Francis Ryan, Rosemary Valasek, Lori Dunkle, Manuel Alfonso, William Kinney, Sue Leimbach, Colleen Imbriale, Janet Wolfe, Ruth Anne Bryant, Diane & Stuart Laderman, Ron Phillips, Amy Gallagher, Tracy Pine, Cecile Matthews, Vicki Embiscuso, Jeffery Kuciapinski, Kathy Neary, David H. Robbins, Linda Bishop, Helena Miller, Bettie Wright, Lia van Rijswijk-Sellers, Tracy Balsone, Daniel R. Trimmer, Pat Wood, Berry Ferguson, Carolyn Viens, Sandra Sweeney, Jim Sankey, Rebecca Wills, Linda Banks, Karen Brubaker, Kurt Eisele, LeeAnn Negley, Beth Baker, Larry Separd, Lisa Lamorgese, Stephen E Bond, Mary Janine Chiles, Timothy F. McNamee, Karen Suzadail, Lynne Henry, Jill Brown, Molly Stewart, John Stickley, Dave Schlosser, Mandy Learson, Peter Chamberlain, Linda Walker, Theresa Saunders, Janet Miller, Merrill Fennell, Bryant Meckley, Sharon DeStefano, Carolyn Smith, Bonnie McCloskey, Christian & Analisa Sondergaard, Elaine Kennedy, Doug Meckley, Diane Ishman-Hunker, Joan Duvall-Flynn, Lori & Rocco Piccone, Joan Duvall-Flynn, Julie Samuels, Mercedes Taylor, Heather Berra, Margaret Smith, Beth Scanlon, Jessica E. Pragada, Ruth Gail Cohen, Kim Foxhall, Melissa Field, Carolyn Carver, Tracey deCerchio, Fred Krause, Cathy Vaccaro, Scott Whittington, Craig H. Peterson, Karen A. Peterson, Ellwood F. Jones, Ruth Hoover Seitz, Mark Arnold, Kathy O'Neal-Sloane, Candace Sparks, Bryan Sanguinito, Deborah Goodman, Pertina Price, Paula Tagliaferro, Shane & Scott Morgan, Wendy Compernolle, Brian Kocur, Colleen Cook, Carol Dishart, Lori Colella, Mark Colella, Michele Campeau, Mike Bravis, Nicole McCormick, Jennifer Shade, Elizabeth Whitehead, David Johnston, Lia Talmas, Randy Reed, Karen Dionise, Susan Sitarchuk, Desiree Packer, Robin White, Laurie Greer, Marie Hoffman, Lisa Plant, Felix J. Yerace, Charles E. Madden III, Richard Noe, Catherine Ferreri, Diann Corll, Kim Yackovich, Margaret Kerr, Jeff & Rusti Null, Dee Corcoran, Rosemary Grill, Charu Gandhi, Amit Prasad, Clarke & Annette McGuire, Amy Wall, Kathy Lozier, Elizabeth Castleman, Denise Dyni, Karen Coulter, Nancy L Tolfa & J Todd Aukerman, Curtis Whitesel, Kevin Nigh, Jaime Reilly, Holli Strange, Anne Butler Ferguson, Bert Sciulli & Anne Marie Ficco, Wythe Keever, Jolene Lowry, Walter R. Zurasky, Ylvonne Gonzalez, Barbara Levitt, Debbie Neatock, Mark & Laura Ohlund, Gary McGree, Lisa Britton, Colleen Innerst, Judy Saunders, Joann Sirera, Paul Billman, Donna Gillespie, Kimberly Zynn, Betsy Fadem, Megan T. Robinson, Bob Griffin, Ronald R. Sofo, Tema Tiller, William & Linda Boston, Catherine A. Chris, Susan P. Hampel, Peg Makela, Harry W. Morgan, K. Scott Long, Robert M. Gumbita, Robert M. Kyl, Frank Aufiero, Michele Burger, Patti Bailey, Catherine Barrios, Patellen Corr, Eric Miller, Patty Sullivan, Rita M. Gosnear, John and Laura Backe, Marilyn Gundy, Juliette Hyson, Cynthia L. Templin, Jennifer Agolino, Jami Smith, Al Bobinas, Steve and Heidi McMurray, Paul Cech, Patricia McElderry, Colleen Johnson, Kristen Ressler, Tom Beccone, Ron Ebbert, Laurel Taylor, Barbara Rathbone-Frank, Jane Wagner, Kevin J. McCarty, Beth Walsh, Mary K. Baden, Veronica Herzog, Zoi McCormick, Lori McFarland, Michael J. Sabal, Elaine Bomkamp, Brenda Gorman, Rick and Lilly Dunsmore, Debbie Stevens, Barbara Ritzheimer, Marianne Neel, William Beck, Paul R. Stepanoff, Carol Forbes, Howard Arensberg, Deanna Moximchalk, Debbie Bent, James G. Routh, Cynthia A. Snyder, Katherine Pettiss, N. Robert Laws, Charles Place, Jim Lee, Paul DiLorenzo, Michele O'Brien, Rose Cavalieri, Mary Miller, Linda A. Schmoyer, Lawrence C. Korchnak, Margaret & William Morgart, Hannah Hepburn, Barbara Jean Gantwarg, Lamia P. Barakat, Kristen Doran, Karen E. Jez, Amelia Berberich, Jeanne Swope, Bernard Miller, Jill Semmer, Joanne Hinton, Bradley C. Norford, David Hutchinson, Sharon Sweitzer, Maria Smith, Douglas N. Frenkel, Brian Chilcote, Sue Holliday, Mary Napoli, Laura J. Anastasio, Jocelyn Kreig, Tina Clark, Monica Miller, Chervl Rometo-Gartley, Selene Tyrrell, Kym Guy, Marcy Bacine, Lee Saunders, Steven Tracy, Alan Holtzer, Laurie M. Rossiello, Majorie Smith, Karen Guglielmo, Helen & Anthony Castrucci, Jeri Myers, Orianna Poruban, Judy Pittenger, Terri Henderson, Lin Bennett, Rachel VanDer Bas, Susan Brown, Bernice Ralph, Mary Ann Burick, Dave Pascale, Rimma Shvartsman, Christine R. Staats, Mindy Gusdorff, A. Pennington, G. Lombardi, Glenn Unger, Mary Wesolek, Deborah Leggens, Chris Kilby, Kate Ritchie, Diane Reisinger, Sue Kissinger, Mary Ellen Donnelly, Charleen McGrath, Lynn Kleinfelter, Shirley Meyers, Margaret Thomas, Nicole Jones, Debbie Fabio, Cindy Duch, Diane O'Rourke, Susan Burke, Gail Leightley, Michelle Smithman, Donna F. Held, Mark Frew, Barbara Jumper, Barbara Blasucci, Michele Mailman, Steve Mailman, Donna Flood, Reid Wolfe, Joe Butzer, Cynthia McCurdy, Margie Cosgrove, Susan Kluge, Jill McIntosh, Lisa Steals, Janet Stasney, Patricia A. Connell, Shelley Kolber, Migdalia Neely, Suzanne Parks, Betsy Snyder, Peter Garland, Becky Espanol, Jeff Bell, Mrs. Deddy, Diane Foriska, Gail Morrison, Joan Sechrist, Tracy Loi, Teresa Koenigsberg, Estelle Kreutzer, M. Joseph Brady, Linda Wagner, Timothy F. Kirby, Robert G. Schwartz, Karen Gatto, Joan Kenney, Mary Lou Pfau, Pamela Seward, Angela Stanton, Carol Brunner, Pamula Zahorchak, Sherry Krallman, Fran Jacobs, Dolores Bostak, Gary Cribbs, David Flaks, William Burnett Jr, Tracy Thoman, Diana Quinn, Sharon Gregorowicz, Kimberly Nussbaum, Theresa Dawson, Lawrence W. Emark, Lorraine Robertson, Ayuko Siegel, Mary

Chandler, Marie Gaul, Elizabeth Andres Bell, Sue Addis, Denise McDermott, Anne Couldridge, Marisa Burton, Michele Planutis, Theresha Collins, Patty White, Michael Gustine, Diane & Evans Pancoast, Marcy Collins, Kathi B. Caber, Melissa J. Marks, Garrett Ingram, Kristin Lacher, Monica Haley, Sheila Kineke, Laura Sisko, Denise Sisko, Lynn Wagner, Kensee Roberts, Stacie Elder, Alexander Rega, Judy Pamer, Kevin Pamer, Nicole Henshaw, Theresa Martino, Kate Rutledge, Tina J. Koren, Mary Keller, Maura Donley, Pat Leo, Patty Orr, Mike Jones, Laura Bale, Linda Miller, Diana Polec, Marian Villella Haley, Jeanine Schultz, Marilyn Barnett, Lori Nichol, Sallie Lynagh, Pam Berntsen, Renee Wright, Nancy Nisbet, Marion C. Alexander, David W. Sweet, Pam Klipa, William J. Thompson, Mrs. Hunsicher, Sharyn Denham, William Hartman, Melissa Dickerson, Frederick Douglas, Ron Domeracki, M. Gayle Moss, Judith Foulke, Richard Kazis, David A. Volpe, Daniel Hubert, Joan Contopidis, Cheryl Simchak, Loran Kundra, James Wurster, K.D. Afferton, Sarah Fitzpatrick, Frank Cortazzo, Cindy E. Roach, Brenda Jewell, Beth Werkheiser, Jeffrey Whitmer, Michael P. Hruska, Andrew Atkinson, Nancy E. Kukovich, Dan and Beth Brennan, Gail Foti, Anita McLean, Claire Kennedy, Paula B., Tom Brown & Roann Pope Brown, Mary Ann Cupples, Barbara B. Anderson, Thomas J. Gentzel, Baruch Kintisch, Melissa D. Patschke, Jake Lopez, Caroline Allen, Homer C. Floyd & Stephen A. Glassman, Thomas R. Chapman Jr., Arthur J. Rothkopf, Barbara Parkins, David Malone, Richard W. Fry, James R. Herdzik, Victoria C. Gehrt, Cynthia C. Hoover, William & Persida Himmele, Stinson W. Stroup, Margaret A. Lacek, Leslie P. Dunleavy, Garney Morris, Sandra & Tom Rhyneer, Patricia & John Duffy, Jeri J. Goldman, Ann Summa, Julia Watkins, Julie Fisher, Sally Coffey, Anne McCrory, Ellen Wagner, Sara Jane Cate, Heather Karschner, Lynn Foltz, Tirannus Parr, Debra Koller, Sheri Scholl, Stephen A. Corr, Lisa A. Borowski, Ellen Irwin, C. Port Williams, Kim Dever, Rumana Ali, Charles Robey, Lawrence A. Feinberg, K.C. & Martina McCleary, Larry Feinberg, Kathy Fernandez, Angela Frey, Adrian Snare, Donna Benson, Thomas D. Longenecker, Gail T. Grib, Louise E. Donohue, Kym Grosso, Barb & Christopher Droogan, Susan M. Concannon, Esther Smith, Laura Kerstetter, Leigh Kramer, Brucie Rapoport, Kimm Doherty, Jennifer W. Leibowitz, Jim DeWitt, Carol Karl & James P. Testerman, Jerry Bourdeaux, Christine M. McNicholas, Gary M Zibinski, Cindy Verguldi, Gerald L. Zahorchak, Patricia K. Stephens, Kathy Murray Leisure, Clarence Ben Dohner, Don Broderick, Linda Cartwright, Kia Hylick, Christine O'Donnell, Rachel Perlman, Laura Bessen-Nichtberger, John Klouser, Laural Schwartz, Nicole Rodgers, Patrick Hughes, Theodore Dmytryk, Rosemarie Dmytryk, Mary Maxey, Karen & Steve Friedman, Cecilia & Ignacio Magana, Claudia Dugan, Debbie Bookstaber, Sharon J. Lamb, Elizabeth H. Ward, Shannon Frigerio, Cheryl Bergsma, Samatha Ballard, Marybeth Panaro, Jennifer & John Conger, Dottie Stinson, Sandi Gorman, Todd Kantorczyk, Kelly Fick, Lois Tabis, Ashley Smith, Ashleigh Keyes, Marla & Peter Neeson, Gretchen A. Guttman, Greg McNicholas, Steven Appel, Steven Gerber, William Kaufman, David Huston, Dawn & Jack Vanden Heuvel, Natalie Sudall, Cynthia Mady McCarthy, Christina Chusid, Michael Kelly, Lee Melchiorre, Francine Bailey, Rita Hillwig, Maria Kalilec, Ashley Waszkiewicz,

Karen T. Brendle, Karen Strohm, Amber Dongilli, Alicen L. Graupner, Molly Baxter, Kevin D. Finan, Debra C. Sanzi, Brian Goppman and Bob Muehlbach.

Comments received by the Board after the 30-day public comment period were submitted by:

Robert L. Williams, Sherilyn Jameson, An-Nisa Knight, Allison Hayden, Elmer D. Gates Amanda L. Brant, Adeline M. Brynildsen, Lisa Murslack, Mary Jane Laquer, Helen Miller, Carol Railsback, Laura Sibson, Alison Gerber, Terry Kinavey, Richard C. Wallace, Robert E. Terrill, Gerald W. Kohn, Fred D. Baldwin, Deborah L. Miller, Keith Morgan, Don C. Vymozal, Joan M. Thomas, Marcia E. Peters, Elaine Caffarelli, Dave Wilson, Kathy and David Chavara, Andrew Leibowitz, Dave Jameson, David Schaef, Austin J. Burke, Elizabeth Snyder, Jane E. Peet, Wendy Greenawalt, Eric Pringle, Mary Coviello, Rep. James R. Roebuck & Rep. Jess Stairs, Charles Thiemann, Amy Tierman, Ilze Rekis Berzins, Christian Jaspersen, Dawn D. Dunn, Don & Kathy Seaton, Emily Sturman, Patrice Masluk Schwartzman, Tiffany Kaszmetskie, Sherry Wright, Andrea G. Fiorentino, Mark Nigro, Kirk Hawk, Christopher SantaMaria, Gerald B. Rosati, Veronica Wade, Kristofer A. Pfitzenmeyer, Pam Klipa, Cathy Moretti, Kathleen Smith, Don Bell, Maurren M. Grosheider, Peter Yarnell, Rich Davies, Chartiers Valley School District, Linda B. Hippert. Anne E. Stephens, Shauna M. D'Alessandro, Debra Cody, Karen E. Jez, Jeri J. Goldman, Mary Baum, Lawrence A. Feinberg, Denis A. Gray and Baruch Kintisch, Ruth Bell, Sari McNamara, Andrea Williams, Larry Mayes, Denis Clark, Richard Gusick, Rose Mary Ryan, Atalanta M. Shabloski, Lynn L. Foltz, Emily Gudewicz, Margaret Brown, Anita Cron, Cynthia L. Eckerd, Laureen Dowd, Janet E. Wolff and Mark B. Miller.

In addition, the Board received comments from the House Education Committee, the Independent Regulatory Review Commission, and the following individual legislators: Representative Paul Clymer, Senator Jane Clare Orie, Senator Jeffrey Piccola, Representative James Roebuck, Representative Stanley Saylor, and Representative Jess Stairs.

II. Comment and Response

The Board received considerable public comment and testimony that expressed support for changes to Chapter 4. Selected excerpts follow:

- As an employer who still has room for good quality high school graduates, and I
 believe I speak for other employers as well, I no longer have any idea what a high
 school diploma really means. But I do know what I need in terms of basic skills in
 the high school graduates I hire, and I know what I'm not always getting.
- Many of the basic skills our employees now use are taught on the job, as they
 come with deficiencies in their basic education. Today, we have no idea when the
 school system sends us a high school graduate with a diploma whether these skills
 exist. We don't even ask for a diploma anymore.

- We are not changing the standards for high school graduates; they have already been changed for us. The modern world and job market require a high school diploma that says the holder is in tip top academic shape, ready right now to compete with the best not just in his or her community, Pennsylvania, or the United States, but to compete with the best in the world.
- We support the efforts of the State Board of Education to ensure that all Pennsylvania public high school graduates demonstrate proficiency in the academic standards necessary for them to succeed in college and career.
- What has taken the Board so long? Our current system is failing many students. The Graduation Competency Assessments, as proposed, are the missing piece.
- Pennsylvania's new graduation requirements represent a tremendous opportunity to create tests that directly capture the application of high school curriculum to success in real life.
- We believe that initiatives to insure that high school students learn and can demonstrate basic competencies in core areas prior to graduation represent sound public policy. Students who leave high school without such a foundation will face a steep climb to postsecondary success and face daunting challenges if they enter the workforce directly.
- We don't have time to train workers on what they need to know coming out of high school. Unfortunately, we are finding our high school graduates today are not always ready to compete in the 21st century workforce.
- From my standpoint, it is very expensive and inefficient when I have to dedicate the time of other employees to training new hires on basic skills these people should have received before they received their diplomas. This hurts the competitiveness of my company, and of Pennsylvania firms in general when competing not only with other firms throughout the U.S., but throughout the world.
- The State Board's proposed regulations provides a more developmental learning and testing option through the GCAs the ability to be tested on what you have learned, when you have learned it, and to get the assistance and support you need immediately to meet any gaps in knowledge and learning. Ultimately, the education and support a student needs to provide a foundation for success in life and work.
- These regulations will help ensure that all high school graduates demonstrate proficiency on the state's academic standard and possess a uniform knowledge and skill base.

- The proposal establishes a set of supports for students and schools to help students reach their fullest potential.
- Pennsylvania needs a strong system of supports for students and schools coupled with a common statewide accountability system so that all our graduates are prepared for the rigors of postsecondary education and 21st century careers.
- The State Board's proposed regulations offer students and school districts a variety of options to assess student achievement of the state's academic standards.
- The proposal calls for specific supports for students and for schools including mandatory remediation for struggling students, voluntary model curriculum that is aligned with the standards, and professional development and technical assistance for teachers and schools.
- The Board's proposal is a sensible approach to make certain that every student from every school district in the Commonwealth has achieved the state's academic standards and is prepared to transition to postsecondary education, 21st century occupations and productive citizenship.
- GCAs will be provided in a format that meets the needs of diverse learners. Testing core subject matter at the time of completion of a subject course will benefit the student immensely since the information will be fresh.
- Perhaps over time this test should replace some form of testing already in place in school districts. "Another test" may not be the answer but the "right test" such as those covered by this proposal is the right answer.
- Poll results from Susquehanna Polling and Research show that 58% of those (business leaders) polled said they support the proposal as a way to ensure all high school students graduate with a minimum level of knowledge and skills.
- All young people in Pennsylvania should have the opportunity and education to build productive and successful lives for themselves and their families.
- Pennsylvanians should hold all its high school students regardless of where they live, their race, income level, or future education or work-related aspirations to the same standards and assess them through comparable, validated tools.
- We need to make our requirements for graduation stricter than they are now.
- *Our students are not prepared enough when they graduate.*
- I would like to see the changes implemented before 2010.

- The GCAs put into place a consistent standard for awarding a high school diploma that can be used with confidence by employers in the hiring process.
- I worked with some 10th graders that couldn't read or write, where schools have promoted children to this grade who couldn't read or write.
- The academic standards movement has improved the clarity and quality of curriculum for all Pennsylvania public school students. That quality, that rigorous and relevant education should be reflected in the attainment of a meaningful high school diploma. I believe that the proposed graduation requirements will serve as a valid and reliable measure for graduation level attainment of the core academic standards.
- A quality assessment system should be linked directly to the curriculum and instruction provided daily in classrooms. The current proposal, through the inclusion of graduation competency assessments, and with the development of model curricula, does so.
- All young people in Pennsylvania should have the opportunity and education to build productive and successful lives for themselves and their families.
- Pennsylvania should hold all its high school students regardless of where they live, their race, income level, or future education or work-related aspirations to the same basic standards and assess them with comparable, validated tools.
- More than 44 percent of our 2007 high school graduates failed to demonstrate proficiency on the PSSA in 11th grade, the 12th grade retake, or did not take the PSSAs but graduated based on local assessments. The latest data available demonstrate that these students are living all across our state: 473 school districts graduated at least 20 percent more students than demonstrated their proficiency on the 11th grade PSSA or the 12th grade retake. A total of 401 school districts graduated at least 30 percent more students than demonstrated proficiency; 280 school districts graduated at least 40 percent more students than demonstrate proficiency and 148 school districts graduated more than 50 percent more students than demonstrate proficiency.
- Far too many college students need remedial education. In data reported to the Pennsylvania Department of Education in May 2008 by Pennsylvania's fourteen community colleges, about 53 percent of first-year community college students, who were 18 to 21 years of age and recent high school graduates enrolled this past fall semester required remediation. At PASSHE institutions, 22 percent of entering freshmen required remediation at a cost of more than \$10.3 million a year. Students who take remedial courses are also much less likely to graduate from college. In fact, only 17 percent of college freshmen who take even one remedial reading course will receive a bachelor's degree within eight years of

high school completion as compared with 60 percent of students who don't need remediation.

- We need to establish consistent statewide measurement of the minimum knowledge and skills that a public high school diploma signifies as well as a complementary system of academic supports to help students achieve. The State Board is not proposing to change the requirement that students need to demonstrate achievement of the state standards. The basic concept remains unchanged from the 1999 requirement. The Board is proposing to change how achievement is measured and to provide school districts a slate of options for measuring achievement.
- I strongly endorse the concept of accountability through periodic assessment of achievement, particularly when that assessment is based on the knowledge and expectations in this case the PA Academic Standards and if possible, a test blueprint and identified eligible content as currently available for the PSSA.
- I support the variety of assessments across subject areas, requiring all students to engage in challenging content in math, English, science and social studies.
- I support assessments that are given at the end of the instructional period. That is, the test is administered as a final exam immediately following course completion.
- I support allowing the student to retake only that portion of the assessment that was initially failed, thereby creating an opportunity to focus intervention efforts on the content not mastered.
- The proposed Chapter 4 revisions also attend to the need to provide supports if we expect students to be successful. We applied the Board's inclusion of the following in the regulations:
 - Requiring PDE to develop voluntary model curricula aligned with the state standards:
 - Requiring PDE to assist districts in development of tutoring, remediation, and extended instructional time programs;
 - Requiring PDE to provide opportunities for continuing professional education for teachers designed to improve instruction in core academic subjects;
 - Requiring districts to provide supplemental instructional support for students not scoring proficient or above on PSSAs or GCAs;
 - Requiring that GCAs be offered at least three times a year and allowing students to retake tests or individual models of tests on which they are not proficient.

- If children got the help they needed along the way, we would have better outcomes, which would lead to better citizens and business leaders for the future.
- Employers, unsure of what the diplomas say about an applicant's skills related to work, have asked for consistency. The Commonwealth's school districts currently have no uniform standards for awarding a diploma, resulting in a system of vastly different graduation standards. Each district sets its own requirements, which has allowed some students to obtain a diploma even though they do not have the skills to succeed in the world of work. This creates a disservice to those students who earn diplomas but lack foundational skills and academic proficiency, who enter the workforce unprepared for the challenges they will face. The result is often poor performance, an inability to compete, high employee turnover and lost productivity, profits and wages.
- Pennsylvania needs to require the PSSA or GCAs for a graduation requirement so that students and parents will support and value the education offered in Pennsylvania.
- Students scoring below basic on the PSSAs in younger grades need to be held back or required to attend summer school if Pennsylvania is to meet NCLB criteria by 2014. Time is of the essence to meet these goals. Harrisburg needs to set high expectations so that children will rise to meet them.
- I don't care about how a student scores on their projects and class grades if they can't pass a simple exit exam. I don't care that they've been in school for 12 years if they still can't read. The bottom line is that we live in a high stakes world. Maybe if we had a standard exam, certain kids would take their studies more seriously. As it stands, a high school diploma is hardly worth the paper on which it is printed.
- In general, a graduation exam is an excellent idea and simply follows procedures that have been in place in other industrialized countries for years. Graduating students who are not proficient in some of the basic requirements devalues the high school diploma and makes a mockery of the educational system.
- In order to reduce the proportion of students who get to the 12th grade only to fail, the results of all the previous tests taken in elementary, middle, and high school must be used for more than cumulative score reporting. These tests must be used as tools to help individual students whose scores are declining and to assess the effectiveness of the curriculum / teachers. Programs to ascertain subject score trends in a particular school or district can easily be developed and MUST be used to evaluate curriculum / teacher effectiveness.

In this section, the Board responds to specific questions and concerns raised by the public as well as the Independent Regulatory Review Commission (IRRC) in its July 16, 2008 comments (State Board of Education #6-312, IRRC #2696). Comments and responses are grouped by topic.

LEGISLATIVE REVIEW

Comment: Citing actions by the legislature, IRRC indicated "that the proposal is a policy decision of such a substantial nature that it requires legislative review." IRRC urged the State Board to work closely with both chambers to ensure that the final form regulation is consistent with the intent of the General Assembly. The House Education Committee echoed this concern.

Response: The State Board of Education responded to this concern by meeting individually with legislators in both chambers of the General Assembly. In addition, the Board's chairperson, Joseph Torsella, took the unprecedented step of delivering advance copies of the proposed "common ground" regulation to the House and Senate Education committees to provide the committees time to comment on the regulation prior to further Board action. Mr. Torsella appeared before the Senate Education Committee on July 14, 2009 to outline the proposal and respond to questions. After reviewing the regulation, the Senate Education Committee, by a vote of 10-1, approved Senate Resolution 156, which encouraged the State Board of Education to adopt the final-form regulation. Finally, on August 13, 2009, three of the four legislators who serve on the State Board by virtue of their chairmanships of the education committees voted in favor of the final form regulation.

AUTHORITY OF THE STATE BOARD

Comment: IRRC asked the State Board to demonstrate its statutory authority for promulgating the regulations. The House Education Committee, individual legislators, and members of the public also raised this concern, especially with regard to statutory authority provided to local school districts to make final graduation decisions for students under Section 1611 of the Public School Code.

In addition, commentators claim the proposed regulation conflicts with existing statutes and regulations – that there is no state or federal law that gives the State Board the authority to require a certain level of performance for students to receive a high school diploma. Many commentators believe the General Assembly has only permitted the use of statewide assessments to measure individual districts' progress, not for deciding which students are to receive diplomas.

Commentators argued that there is no current state law that authorizes linkage between standardized assessment performance and the granting of a diploma.

Response: Article XXVI-B of the School Code provides "(b) The Council of Basic Education shall have the power, and its duty shall be to: (2) ... formulate policy proposals in all educational areas not within the purview of higher education, including, but not limited to... (v) admission, attendance, **graduation and other separation**

requirements." The Board's authority stems from the explicit authority given to the Council of Basic Education to formulate policy regarding graduation and other separation requirements. Since its inception in 1963, the State Board of Education has set high school graduation requirements.

Section 1611 of the School Code refers to the power to grant academic degrees; 1611 does not grant sole authority to school boards for determining the criteria for awarding academic degrees. Rather, school boards may award academic degrees that meet the requirements established by regulations of the State Board of Education *and* the school board.

This regulation leaves in place and does not conflict with longstanding policy that school districts must address requirements relating to course completion and grades, completion of a culminating project, and demonstration of proficiency in state and local standards. As provided in Chapter 4, districts are permitted to add additional requirements to those established by the State Board.

Comment: Commentators asserted that the State Board violated the one-year moratorium contained within Act 61 of 2008: "Notwithstanding any provision of law to the contrary, in the 2008-09 fiscal year, a regulation to change or establish high school graduation requirements shall not be further promulgated, approved or proposed." Comment suggested that the Department's request for proposals (RFP) and subsequent contract for development of end-of-course exams violated this moratorium.

Response: In fiscal year 2008-09, the Board did not promulgate, approve or propose a regulation to change or establish high school graduation requirements as these terms are defined in state law. While the Department's actions were independent, it is important to note that the contract will guide development of voluntary resources; the contract does not change or establish graduation requirements.

LOCAL CONTROL

Comment: Members of the public argued that the proposal usurps the authority of local school boards to set curriculum and decide whether their students have earned a high school diploma. Again, commentators pointed to Section 1611 of the School Code, which invests "the power to confer academic degrees, honorary, or otherwise ..." to the board of school directors of the district. Section 1613, which invests the power to issue high school certificates in the board of school directors, and Section 508, establishing that a majority vote of the school board is required to adopt courses of study, were also cited. Public comment claimed this statutory language creates an "implied right to local control."

Response: Sections 2603-B(a) and 2604-B(b)(v and vii) provide clear authority to the Board to establish curriculum requirements, academic standards, and assessments.

Comment: Senator Jane Orie voiced concern that the end-of-course exams would circumvent the role of local school boards, citing regional scoring of alternative pathway projects and the Secretary of Education's authority to exempt students on a case-by-case basis.

Response: The project-based assessment is a component of the successful course completion/Keystone exam pathway for meeting graduation requirements — one of several options from which districts will choose. The project-based assessment can be used to supplement a Keystone exam score, with the combined score counting as one-third of the student's final course grade for purposes of meeting graduation requirements; the teacher, school, and district continue to determine the other two-thirds of the student's grade.

With respect to the Secretary's waiver authority, requests to exempt students must be made in writing by a chief school administrator. The Secretary can not unilaterally grant a waiver.

ROLE OF THE EDUCATION COMMUNITY

Comment: Representative Paul Clymer expressed his desire to have the end-of-course exams vetted among school administrators and local school boards.

Response: Since the State Board began work on this regulation in July 2007, it has held seven public roundtable meetings, seven public hearings, six meetings of the Board (which include public comment periods), more than 22 meetings with state-level education groups and advocates, and numerous individual meetings and discussions with school directors, superintendents, intermediate unit executive directors, teachers, students, parents, researchers, education policy experts, and others. Specifically, the chair of the Board met with education stakeholders, including representatives of the principals, superintendents, and school boards' associations and the teachers union to discuss the regulation as it progressed toward final-form. In significant ways, the final form regulations reflect suggestions advanced by these stakeholders.

Should these regulations be enacted, Pennsylvania educators will play a significant role in developing and field-testing the end-of-course exams and establishing performance levels for the assessments.

EVIDENCE

Comment: Commentators argued that the Department has not produced any valid data to justify its claim that existing, locally-designed assessments are not reliable measures of proficiency; therefore, the regulation should be rejected in favor of less expensive, locally-developed validated assessments.

Likewise, the House Education Committee argued that research was needed to support the proposed regulations. For example, the committee noted that the proposal

was based, in part, on discrepancies between the number of students in a district who graduate and the number who achieve proficiency on the Pennsylvania System of School Assessment (PSSA). The committee observed that the PSSA was never validated as an exit exam, nor was it designed as such. In addition, the committee noted that no analysis of local assessments had been performed to determine if these assessments are, in fact, inadequate. The committee urged further review with respect to the PSSA and SAT (a 2005 study indicated a predictive relationship between PSSA scores and first-year college performance).

Based upon the above issues and concerns, the committee recommended that the Board conduct an analysis of local assessments used as graduation requirements to determine why the current system is insufficient.

Response: In response to requests by the committee and IRRC, the Department contracted with a research team at Penn State's College of Education to collect local assessments and rate the degree to which the assessments align with the standards and are used appropriately in graduation decisions. In its February 2009 report, the research team noted "considerable variance in the type and form of these local assessments as well as the manner in which these assessments are used as graduation requirements." Based on the criteria established and ratings by Pennsylvania educators, "evidence of alignment to standards and practices that could result in valid measures of proficiency was present from 5 percent of those school districts that submitted local assessments."

With respect to PSSA results and postsecondary performance, approximately 40% of graduates – more than 50,000 students each year – are awarded diplomas without demonstrating grade-level skills on the PSSA in reading, writing and math. Fewer than half of our young people enroll in college upon graduation, and only 37 percent make it to the sophomore year; just one-third of college students graduate on time. The cost of remedial instruction at state universities and community colleges exceeds \$26.4 million each year. (This total does not include remediation costs incurred by students enrolled in the state-related universities or independent colleges.)

CRITERIA FOR LOCAL ASSESSMENT

Comment: The House Education Committee expressed concerns that the proposed changes require local assessments to be independently validated as aligned with the state academic standards based on criteria that would make the local assessments similar to the proposed end-of-course exams (then Graduation Competency Assessments). These criteria would effectively prevent districts from using other forms of appropriate assessments of student proficiency. Members of the public echoed this concern and argued that the validation requirement would take away the option for diverse learners to demonstrate proficiency on local measures, and instead require a costly, high-stakes standardized test.

Related public comments asked that the regulations allow districts flexibility in terms of graduation requirements for individual students. For example, many argued that

some students who cannot master every test still achieve at high levels and deserve to graduate.

Response: This final form regulation provides for a Local Assessment Validation Advisory Committee, which will involve representatives of the school boards and other stakeholders in setting the criteria for the local validation process as well criteria for selection of validation entities

Under the successful course completion/Keystone exam option, a graduation decision will be based on multiple measures and students will be able to retake an assessment or complete a project-based alternative to meet requirements.

The final form regulation includes language in Section 4.24(b)(iv)(B), indicating "Local assessments may be designed to include a variety of assessment strategies...."

NEED FOR ADDITIONAL TESTS (WHY NEEDED)

Comment: IRRC requested a more thorough explanation of why the current system is not adequate to address the problem. IRRC suggested that if the Board determines that regulatory changes are needed, it should consider administering those on a case-by-case basis, not a statewide mandate. Many public comments echoed this concern, citing districts with high levels of student proficiency in reading, math, and science – either through the PSSA exams or on local assessments. Similarly, members of the public also referred to the success of districts in preparing students for success in college (e.g., students receiving admission to selective colleges and universities across the nation). Current standards for graduation as well as PSSA results were cited as evidence of redundancy (e.g., another battery of tests will only confirm what is already known). Finally, public comment argued that this regulation will not improve classroom instruction for struggling students.

Senator Orie argued that the PSSAs are improving student achievement, as evidenced by the 2009 PSSA results. The Senator asked why the state should change course at a time when we are finally seeing progress and have limited financial resources.

Response: There is significant, statewide disparity between the number of students granted diplomas and the number demonstrating proficiency in reading, writing and math on the 11th grade PSSA. In both 2007 and 2008, more than 40 percent of high school graduates had not demonstrated proficiency in reading, writing and math on the PSSA and only 44 school districts have a disparity of less than 20 percent.

Similarly, Penn State's Local Assessment Validity Study found that fewer than 20 school districts statewide had local assessment systems that could ensure valid measures of proficiency for graduation purposes. The regulation is a state-level response to a state-level challenge.

In response to concerns regarding duplicative testing, the Department will seek approval from the U.S. Department of Education (USDE) to replace the 11th grade PSSA (and 12th grade retest) with three end-of-course exams for *No Child Left Behind* purposes. (The USDE has approved this change in several other states, including Maryland.) This change will reduce testing time and ensure better alignment between instruction and assessment.

Finally, the proposal extends far beyond the development of new assessments: the regulation provides for a voluntary model curriculum that will support teachers and improve the consistency of academic expectations statewide as well as classroom diagnostic tools that will provide real-time feedback on student learning, thereby reducing the need for out-of-class remediation.

PENDING FEDERAL EDUCATION POLICY CHANGES

Comment: Senator Orie questioned the wisdom of implementing these changes while the federal government is beginning to move toward national standards.

Response: Pennsylvania's academic standards are among the highest in the nation, so movement toward a common core of national standards is likely to complement (and not contradict) the State Board's efforts. In addition, it is likely that states that elect to utilize national resources will be permitted some flexibility in implementation.

ACADEMIC RIGOR

Comment: Some commentators argued that new end-of-course exams will not be as rigorous as the current 11th grade PSSA, which includes test items that relate to algebra I, elements of algebra II and trigonometry. They argued that replacing an exam that has more difficult questions would "dumb down" standards, rather than improve rigor.

Response: The PSSA is a comprehensive exam that measures the full range of state academic standards as outlined in the assessment anchors. Because it measures the full range of content, there is a tradeoff between breadth and depth and students may be tested on content prior to receiving instruction.

The end-of-course exams will be designed as deeper measures of student knowledge and skill in each tested subject. The Board expects schools to provide advanced-level learning opportunities that exceed the minimum state requirements. School districts are free to establish more rigorous courses, assessments and graduation requirements. Students can also meet state graduation requirements by passing rigorous Advanced Placement or International Baccalaureate exams.

EFFICACY OF TESTS

1. High stakes testing

Comment: Commentators argued the regulation would result in high-stakes testing of students who already face a heavy burden of standardized assessments (e.g., PSSA, PSAT, SAT, ACT, AP). In addition, commentators referenced research that suggests high-stakes testing can have adverse impacts on students, and particularly minority students. Several commentators argued that improper use of assessments can constitute a civil rights violation – especially if the student has been denied an opportunity to learn.

Response: The Board responded to concerns about high stakes by eliminating a requirement that students pass six end-of-course exams in order to graduate. In the final form regulations, the end-of-course exams, if used, are worth one-third of the student's final course grade, with the teacher and district determining the balance of the grade. By virtue of the eventual elimination of the 11th grade PSSA, students will have less testing.

In addition, the regulation includes protections such as retakes (students can retake exams in whole or in part), a rigorous project-based alternative for students who may not test well, and a provision guaranteeing supplemental instruction for any student who does not demonstrate proficiency.

The regulation provides for new resources for schools – including a voluntary model curriculum and instructional diagnostics – which will precede the new graduation requirements and help ensure that students have opportunity to learn tested material.

2. Impact on Drop out rates

Comment: Several commentators asserted that this proposal will increase drop out rates. Comments pointed to a study conducted by Boston University's National Board on Educational Testing and Public Policy which showed that in schools with proportionately more students of low socio-economic status that used high stakes minimum competency tests, early dropout rates (between the 8th and 10th grades) were 4 to 6 percentage points higher than in schools that were similar but for the high stakes test requirement.

Response: There is no evidence that higher academic expectations for students increases drop out rates. The factors that drive a student to drop out are complex and often emerge long before high school; these include an unsafe school, lack of challenging curriculum, and family and personal struggles.

In addition, it is difficult make comparisons between assessment systems that feature high-stakes, comprehensive assessments and the multiple pathways for meeting graduation requirements under these regulations. For example, the current regulation removes the "high stakes" requirement in that no student will be denied a diploma based on test scores alone. The standard end-of-course exams now count for a portion of the grade and students can pass the course without having scored proficient on the exam. In addition, students have several opportunities to retake the test, or modules of the test, and

may supplement their end-of-course exam score by performing one or more projects. Finally, students who face extenuating circumstances may be exempted from one or more requirements upon request by the superintendent to the Secretary.

The regulation includes provisions designed to meet the specific needs of students who have traditionally left school without the skills required for postsecondary success. Section 4.4 of the final form rulemaking provides for development of model curriculum, diagnostic supports and assistance in developing effective student tutoring, remediation and extended instructional time programs. The regulation also requires the Department to provide opportunities for continuing professional education that is designed to improve instruction in each of the content areas assessed by an end-of-course exam. Each of these supports will expand opportunity to learn and minimize potential increases in dropout rates.

3. Narrowing of the curriculum

Comment: Several commentators expressed concern that the introduction of state-level end-of-course exams would result in a narrowing of instruction to tested subjects and "teaching to the test." Others (especially school board members) argued that a state-controlled curriculum would reduce a district's ability to design curriculum based on community needs and desires. Several high-performing districts attributed their achievement gains to local policies and practices, and argued that state-level regulations could halt this progress.

Response: This regulation does not create a state-mandated curriculum. Under the Chapter 4 regulations adopted in January 1999, school districts are required to align their curriculum to the state academic standards. While districts have significant flexibility in the design and delivery of instruction, all districts are to educate students to proficiency in all twelve sets of state academic standards. As stated in Chapter 4, districts may go beyond these standards and graduation requirements; Chapter 4 sets a floor, not a ceiling.

In addition, the Board believes that more rigorous and consistent graduation requirements are necessary as our students prepare to compete in a mobile society and global economy.

4. Over-testing

Comment: Numerous commentators shared concerns about over testing students. They argue additional tests will take use up additional limited instructional time. The tests will use precious instructional time to prepare students to take the tests as well as the actual time used to administer the tests.

Response: Under the final regulation, the four 11th grade PSSA tests would be replaced by three end-of-course exams (literature, algebra I, biology). The PSSA exams take approximately 18 hours to administer. The end-of-course exams can replace

existing locally-developed finals, thereby *reducing* testing time by the equivalent of the three instructional days.

5. Tests do not address 21st century skills

Comment: Commentators argued that end-of-course exams will not assess skills that are needed in a 21st century world such as creativity, problem solving, independent thinking, etc.

Response: The end-of-course exams will be aligned with Pennsylvania's academic standards and each assessment will be designed to measure higher-order thinking skills such as problem solving. However, assessment results are just one factor in determining proficiency for graduation requirements. Current Chapter 4 regulations require districts to use multiple measures, including course completion and grades and completion of a culminating project, in graduation decisions. This regulation will ensure additional evidence informs graduation decisions while providing students with additional flexibility to meet state requirements and demonstrate 21st century skills.

6. Pencil/paper tests not best indicator of student achievement

Comment: Commentators argued that tests are not the best indicator of student achievement. Those who work with students each and every day are in the best position to evaluate performance.

Response: Under the successful course completion/Keystone Exam pathway, assessment results are just one of several factors that school districts must consider when determining whether a student meets state and district graduation requirements. Keystone Exams count for one-third of the final course grade; district policies and teacher assigned grades count for two-thirds of the student's final course grade in the subjects tested. In addition, district policies and teacher assigned grades count for 100 percent in those subjects in which Keystone Exams are not administered. Finally, given the findings of the Penn State study on local graduation assessments, it appears that the majority of local assessments used by districts to determine student proficiency in reading, writing and mathematics cannot ensure valid measures of proficiency.

7. Research doesn't support testing

Comment: Related public comment asserted that research shows many reasons why standardized test scores should never be the determining factor in graduation decisions. As discussed above, commentators argued that exit exams do not measure higher-level thinking, oral and written literacy, or a student's ability to analyze conflicting explanations, solve complex problems that have no obvious answer, find, assemble and analyze information, engage in the give and take of ideas, and reach conclusions.

Senator Orie echoed this concern and asserted that there is no data demonstrating the benefit of passing exit exams or end of course exams in terms of college or career success.

In terms of the gap between the number of students graduating and the number demonstrating proficiency on the 11th grade PSSA, commentators argued that the discrepancy can be attributed to the fact that the PSSA was not designed to be an exit exam. Comment cited the Human Resources Research Organization (HumRRO) study as evidence that several thousand students who scored basic on the PSSAs went on to take at least standard level math or English college courses.

Response: Increased student achievement depends on a variety of factors: high standards aligned with strong curriculum, valid assessments, related teacher professional development, and age-appropriate interventions. This regulation is just one part of an aligned education system. For example, the regulation includes the completion of a culminating project among the requirements for graduation from high school, the purpose of which is to ensure that students are able to apply, analyze, synthesize and evaluate information and communicate significant knowledge and understanding.

The connection between increased standards and increased achievement can be seen in examples nationwide. Several years ago, the San Jose Unified School District began requiring all students to complete the full set of courses required for admission to California's public colleges and universities. The percentage of San Jose students taking this rigorous curriculum and earning a C or better in all of the courses increased from 37 to 65 percent between 2001 and 2004. More rigorous course-taking also had a positive effect on test scores and helped increase the college-ready rate for Latinos from 17 percent in 1998 to 45 percent just four years later. Since Virginia implemented its end-of-course Standards of Learning tests, student achievement has increased in all subject areas.

According to HumRRO, the 11th grade PSSA is a strong predictor of a student's readiness to succeed in current college-level work or entry-level jobs. If a student performs at proficient or above on the 11th grade PSSA, they have a 90 percent chance of placing directly into college-level courses with no need for remediation. Remedial coursework places a significant financial burden on Pennsylvania students and taxpayers: a February 2009 report by the Department's Office of Postsecondary and Higher Education found that more than 60,000 students at state system universities or community colleges are enrolled in remedial coursework, the cost of which exceeded \$26 million in 2008-09.

8. Validity of end-of-course tests

Comment: Several commentators questioned whether the State Board was provided with valid research, including longitudinal data, to show that subject specific exit exams have proven to be predictive of college and career success. Other commentators stated that difficulty passing a standardized test does not mean that a

student is not adequately prepared for postsecondary endeavors. Some expressed concern that Keystone Exams will not account for differing learning styles and variance in education funding across the state. Several public comments also expressed concerns regarding the validity of adding points to exam grades from scores received on individual modules.

Response: There is a considerable body of research that demonstrates that well constructed, reliable standardized tests are valid predicators of first year college performance. The SAT and ACT are designed for this purpose. The HumRRO study of the PSSA found the 11th grade PSSA reading and math tests to be as reliable a predictor of first year college performance as the SAT. According to the HumRRO study, the small number of students who did not score above the proficient level on the PSSA did score within a few points of the cut score. In all likelihood, those students would have improved their scores with supplemental instruction and the opportunity to retake the test.

A January 2008 study of statewide end-of-course testing programs performed for the Washington State Board of Education by Education First Consulting shows that end-of-course tests have several advantages over comprehensive exams like the PSSA. These include measuring the breadth and depth of standards; assessing students near the point of curriculum delivery; validity and reliability of assessments; reporting results at the classroom and course levels; measuring readiness for postsecondary education; and, providing access to rigorous courses while preserving flexibility.

Finally, regarding concerns about differing learning styles and variance across districts, Keystone Exams are not "all-or-nothing," pass/fail high stakes graduation tests. Exam scores will count for one-third of a student's final course grade for those subjects in which Keystone Exams are administered, should the school district choose to use the Keystone Exams. Under this regulation, districts have significant flexibility for implementing requirements and graduation decisions will be based on multiple measures, including multiple opportunities to demonstrate proficiency.

Comment: The House Education Committee shared its concerns regarding the consequences of testing that determines whether a student earns a high school diploma. The committee cited research linking high-stakes tests with adverse impacts on students living in poverty, minority students, English language learners, and special needs students. The committee argued that such tests increase dropout rates and narrow curriculum. The committee urged further review with respect to creating another barrier for these students as they seek to move forward in their lives towards work, college or military service without a diploma.

The IRRC echoed concerns about adverse impact and the potential for an increase in the dropout rate. IRRC also repeated the comments of several commentators who suggested that exemptions and lesser standards of compliance are needed for some students, in particular special education and ESL students, when high-stakes consequences are attached to individual performance on mandatory assessments. The IRRC asked the Board to consider this suggestion, and if the Board decides not to adopt

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it, to provide a detailed explanation of how students with special needs will be accommodated.

Likewise, members of the public expressed concern that the requirements will be the same for all students, whether they are taking college prep or vocational courses, are English language learners or participating in individualized programs. As such, the requirements will not meet the needs of diverse learners and do not permit assessment of students in nontraditional ways.

Additional concerns were voiced regarding the disproportionate impact on minority students. Comments asserted that these populations will be disproportionately denied a high school diploma based on performance on a single test.

Other commentators indicated that while proponents suggest that end-of-course exams are an additional way to demonstrate proficiency, the tested subjects are not available to – or taken by – all students. Therefore, the students most at risk would have fewer courses to choose from, or they would be required to study courses above their ability levels.

Response: In significant ways, this regulation responds to the concerns outlined above.

Regarding high stakes and adverse impacts, there is no evidence that higher academic expectations increases drop-out rates. Nevertheless, this regulation includes provisions and protections – suggested by education stakeholders – designed to meet the specific needs of students who have traditionally left school without the skills to succeed in college or the workforce.

By improving the consistency of graduation requirements statewide, this regulation will provide clear expectations for student achievement. To help students meet these expectations, the new requirements will be coupled with supports including a voluntary model curriculum and instructional diagnostic tools. Graduation decisions will be based on multiple measures – not one test – and students will be able to retake an assessment or complete a project-based alternative to meet requirements; no student will be denied a high school diploma based on test scores alone. Finally, any student who does not demonstrate proficiency shall be offered supplemental instructional support.

While improving the consistency of academic expectations, this regulation is not a one-size-fits-all approach. For special needs students, nothing in this regulation will override the policies and expectations outlined in Individualized Education Plans (IEP) and students who take end-of-course exams will be afforded accommodations consistent with their IEP. All students who seek to meet graduation requirements via the successful course completion/Keystone route will be afforded opportunities to retake the tests in whole or in part and to supplement their scores with project based assessments.

PERCENTAGE OF GRADE

1. Keystones as 33 percent of grade

Comment: Commentators argued that counting Keystone exam scores as one-third of a student's course grade is too high a weight for a single assessment. Commentators suggested that the 33 percent weight – coupled with the requirement that students score at least Basic to earn credit (see below) – would unfairly affect students competing for college acceptance and scholarships.

Response: Many states require students to pass a standardized assessment to earn a high school diploma, and indeed this was the initial construct of the "Keystone option" in the State Board's draft regulations: students could meet graduation requirements by passing six of ten end-of-course exams. The final form regulations respond to concerns about high stakes testing and instead provide for multiple measures, ensuring that no student will be denied a high school diploma based on test scores alone.

Students will be able to retake end-of-course exams in whole or in part (which is not normally the case with locally-developed assessments, owing to limited item banks). Students can also supplement an end-of-course exam score by completing a project-based assessment. These provisions reduce the stakes associated with test performance while also ensuring both school and student accountability.

2. Zero points for Below Basic

Comment: Several commentators expressed concern that students scoring below Basic on a Keystone exam will not earn points toward their final grade. For example, commentators argued that students deserve credit for the knowledge they demonstrate, even if the performance is poor. Some commentators saw the threshold as arbitrary and punitive.

Response: It is important to note that students can earn points for a score of Basic; however, a score of Below Basic signifies extremely low performance – comparable to a D or F. The following are the performance level descriptors for Below Basic on the 11th grade PSSA:

Reading: A student scoring at the Below Basic level demonstrates competency with below grade-level text only and requires extensive support to comprehend and interpret fiction and nonfiction.

Math: A student performing at the Below Basic level demonstrates limited understanding of the concepts and ineffective application of the mathematical skills in the five Pennsylvania Mathematics Reporting Categories. (The 5 categories are: numbers and operations, measurement, geometry, algebraic concepts and data analysis and probability.)

Writing: A student scoring at the Below Basic level produces writing that demonstrates a below grade-level understanding of composition skills and requires extensive assistance with composing, revising, and editing.

The Board believes that students who do not demonstrate at least a Basic level of performance should receive supplemental instruction, retake opportunities, and, ultimately, if needed, an opportunity to demonstrate ability through the project-based assessment. This process ensures students will get the extra help they need to attain a basic level of achievement in the core academic subjects.

3. Impact on Grade Point Average (GPA) or Quality Point Average (QPA)

Comment: Commentators observed that Keystone exam scores may impact a student's GPA or QPA. Was this taken into consideration when the decision was made to count the test as one-third of the student's grade?

Response: The regulation was revised to reflect concerns expressed that a high-stakes assessment would prohibit some students who may have already been accepted to a college from earning a high school diploma. The regulation does not address school district grading systems, nor the methods used to calculate GPAs/QPAs. These remain matters under the control of each local school board. However, should a district choose to use Keystone exams to determine readiness for high school graduation, they must count the Keystone exam score as one-third of the final course grade. Districts may also continue to use local assessments that have been validated and determine the value of these assessments towards the final course grade.

Comment: A commentator expressed concern that, under the regulations, a student enrolled in Honors Biology will take the same final exam as the student enrolled in Biology and both will account for one-third of the student's final report card grade, which ultimately reflects his/her quality point average.

Response: As discussed earlier, the state-level requirements reflect core expectations. School districts can establish high standards and have the ability to develop and use their own local assessments.

ISSUES RELATING TO AP/IB EXAMS

Comment: The Independent Regulatory Review Commission outlined several concerns about the use of Advanced Placement (AP) or International Baccalaureate (IB) exams as graduation requirements. Can a school include AP/IB exams in its graduation requirements, or can only one of the exams be included? If a student takes one of these exams to fulfill graduation requirements but does not score proficient, will the school have to provide supplemental instruction? If a student does not score at the proficient level, is there a re-take provision? How will a school entity know if a particular exam is comparable to a GCA? Would it be possible for one of the exams to be the equivalent of two GCAs? What methodology with the Secretary use to determine the proficient level for a particular AP/IB exam?

Members of the public commented on the relationship between the AP exams and the Keystone Exams as contained in the final form rulemaking. The content of an AP course is driven solely by the curriculum audited by the College Board and not necessarily related to the PA Standards. Although the concept of utilizing such an exam may sound positive, logistically this provision contains many flaws.

Response: Schools can use one or more of the three available options, including AP and/or IB. The Advanced Placement program is administered by the College Board, the same organization that administers the Scholastic Aptitude Test (SAT). The College Board establishes standards for Advanced Placement instruction, audits the program and administers the Advanced Placement test each spring. Students who achieve at a specified level may be granted college credit. Advanced Placement tests are administered in the following subjects aligned with the proposed Keystone Exams: English Language and Composition, English Literature and Composition, Chemistry, Environmental Science, Biology, United States History, World History, European History, United States Government and Politics. The College Board does not administer AP in Algebra or Geometry; however, it does administer two AP tests in Calculus. Only students enrolled in approved AP courses may take the AP exam for that course.

The IB is a nonprofit educational foundation, which has its headquarters in Geneva, Switzerland. It offers three programs for students aged 3 to 19 help develop the intellectual, personal, emotional and social skills to live learn and work in a rapidly globalizing world. Founded in 1968, IB currently works with 2,600 schools in 134 countries to develop and offer three challenging programs to over 707,000 students aged 3 to 19 years. Ten Pennsylvania public schools operate the high school program and six middle schools operate the middle level program. Only students enrolled in the IB program may take the IB exams. IB exams are administered twice each year, May and November. IB tests require 15 full days of testing and cover English, Mathematics, Biology, Environmental Science, Physics, Chemistry, History, Economics, Social and Cultural Anthropology.

Students can only take these tests in accordance with the policies and directives of the College Board and International Baccalaureate Organization; therefore, opportunities for retest are limited. In addition, because the College Board does not return scores until mid-July, the use of AP tests in lieu of other testing options is viable only for students who are in their junior year or younger. (Seniors would not receive scores in time to be considered for graduation.) However, because of the advanced level of many of the AP courses, most students who would take AP courses would have already taken most of the Keystone Exams or validated local assessments required for graduation prior to taking the AP course. For students who take AP courses early in their secondary career, successful completion of the AP course and achievement on the AP test will allow a student to bypass the related Keystone Exam.

The Board recognizes that AP courses and exams are not precisely aligned with state academic standards. However, the Board – like institutions of higher education across the country – recognizes the rigor and value of AP courses and the IB program.

These programs maintain high standards through the use of a standard curriculum enforce standards of teacher quality and conduct periodic audits of the programs. Therefore, the Board accepts these national/international programs as satisfying the Commonwealth's standards.

IMPACT ON CAREER AND TECHNICAL EDUCATION STUDENTS

Comment: Several commentators shared concerns that students who choose vocational-technical education will be disproportionately harmed because the curricular offerings in vocational-technical schools are not of the nature to be measured by one of the proposed exams, but rather are better judged by the evaluation of hands-on classroom activity. Public comment asserted that the goal to graduate students who are career and college-ready is better served if the National Occupational Testing Institute (NOCTI) assessments were allowed to replace the requirement to score proficient or higher on six GCAs.

Response: Under the existing Chapter 4 regulations, students in vocational and technical programs must demonstrate proficiency in both the state academic standards on the PSSA or local assessments and in their vocational/technical field. Exams developed by the National Occupational Competency Testing Institute (NOCTI) are used in some fields to assess student competency in the vocational/technical field. Students currently must also take the PSSA. The final regulation actually expands opportunities for students to demonstrate proficiency in the core academic subjects. Students who are not successful on a Keystone Exam will be provided supplemental instruction. The student will need to retake only those portions, or modules, of the Keystone Exam on which they were not successful. Should the student be unsuccessful a second time, they will have the opportunity to demonstrate their knowledge and skills through a project-based assessment, which is aligned with the Keystone Exam. The State Assessment Validation Advisory Committee established by the regulation, will investigate the use of a certificate based on industry approved standards and performance on a NOCTI exam as an alternative pathway to graduation should be used. The Committee is to provide a report with its recommendation to the Board within one year of the effective date of the regulation.

Comment: Public comments asserted that the goal to graduate students who are career and college-ready is better served if the National Occupational Testing Institute (NOCTI) assessments were allowed to replace the requirement to score proficient or higher on six end-of-course exams.

Response: The State Assessment Validation Advisory Committee established by the regulation, will investigate the use of a certificate based on industry approved standards and performance on a NOCTI exam as an alternative pathway to graduation should be used. The Committee is to provide a report with its recommendation to the Board within one year of the effective date of the regulation.

SPECIAL NEEDS STUDENTS

Comment: Several commentators expressed concerns that although the proposed regulations allow IEP teams to exempt special education students from scoring proficient to graduate, it does not allow special education students to be exempted from taking the tests. They argued that children suffer emotionally and academically as it often takes days or weeks for students to settle down from the trauma and start to learn again.

As a related matter, comments asserted that this proposal would cause a flood of students entering special education as a way to avoid the state tests, taking time and resources from the children who truly need special education services.

Advocates of inclusion for students with disabilities expressed concerns about the impact of these regulations on efforts to have students with disabilities included as part of the regular educational community. Students who are in inclusive settings may be pushed aside by teachers who view their primary responsibility to be getting "qualified students" (i.e. students who have not opted out of the exams) to pass the exams. If teacher's time and efforts are focused on the teaching and remediation to enable students to pass the competency exams, and students in the room with an IEP have opted out of these exams, the teaching staff may perceive themselves as less responsible for these student's performance, and they will not have access to the remediation and support being offered to others. This may lead to more requests for mediation and due process hearing requests as students with disabilities are deprived of their right to a free appropriate public education.

Others argued that even though there are provisions for students with IEPs, there remain students who fall through the cracks, never being identified with learning disabilities, autism, or other disabilities, who will be adversely affected. This in turn, will place an increased burden on the Office of Vocational Rehabilitation, or in the worst-case scenario, on the already stressed prisons and welfare systems.

Response: Under the long-standing provision in Section 4.24(e), the requirements explicated in the IEP will supercede the regulation. Under federal law, all students must participate in the tests used to determine AYP. The Board has no authority to contravene federal requirements. Therefore, every student must take the PSSA, or the Keystone Exams in literature, algebra I and biology when these tests are approved by the federal government. However, like the PSSA, the three Keystone Exams will also have alternative assessments developed to assess student performance for students with severe cognitive disabilities and also for the "2%" eligible students who will be assessed using alternate learning standards.

With respect to parents and teachers seeking to have students evaluated and placed into special education to allow their students to avoid having to meet the new high school graduation requirements, the Department, as a requirement of the federal Individuals With Disabilities Education Act, carefully monitors the percentage of students enrolled in special education programs each year by each school district. Districts that show increases in their special education population must explain the reason

for the increase to the Department, which performs both on-site and desk monitoring of the district to insure over-identification of students in special education is not taking place. Districts can face sanctions should they be found to over-identify students for services in special education.

In addition, federal law and the Gaskin Settlement Agreement require schools to place students in the least restrictive environment. The Department monitors district compliance with this requirement. Should districts begin to reverse the effort to increase placements of students in the least restrictive environment, they will be subject to closer oversight and possible sanctions.

ADMINISTRATIVE BURDEN ON SCHOOLS

Comment: IRRC expressed concern that the proposal will place an administrative burden on schools, citing the number of Keystones that will be required and the number of times the tests will be administered. IRRC also requested additional clarity around implementation issues.

The House Education Committee also raised concerns about implementation issues, including retakes of the exams, retakes of exam modules, and remediation of students who do not pass the test. The impact of retakes on space availability, transportation, and collective bargaining agreements were also listed as issues that will impact school districts. Representative Clymer shared his concerns that the proposal would create more bureaucracy and result in an unfunded mandate for local schools.

Public comment suggested simplifying the system required to implement the assessments by administering the exams only at the end of an appropriate course or once every semester. Eliminate the modular nature of the tests – students who do not pass the test should be required to retake the entire test (only because of the nightmare of administering modules for each student for ten different tests). Comments also suggested that regional test sites be provided over the summer months for students to retake the tests.

Response: The Board believes the administrative burden imposed by the rulemaking is reasonable. The Keystone Exams, if used by districts, replaces the current final course exams already administered in high schools across the state and implementation of this regulation may reduce testing time.

The tests are to be offered three times each year, which will provide students with multiple opportunities to retake the tests (or modules of the tests) should they need to. (Districts may request alternative test administrations should the state testing schedule not align with their local schedule.) Unlike the PSSA, which is administered to the entire grade, Keystone Exams will be administered to students enrolled in ten courses; students who need to retake all or part of a test would also participate.

The Board does not believe this more student-centered framework poses an undo burden on schools. Most high schools already set aside time on their calendar to administer final exams. Because the regulation provides school districts and students multiple options to demonstrate student proficiency, this positive aspect of the regulation has a price – it adds complexity to tracking students and which tests they need to take. To help districts deal with this challenge, the Department will develop a Keystone exam data system that will allow districts to track student achieve on the Keystone Exams and its modules. The system can also be used to track student progress on the project-based assessments. Many of the concerns shared in public comments focused on operational issues. Due to the Act 61 moratorium, much of the work that otherwise would allow for answering questions regarding the actual design, administration and operation of the tests is on hold.

Comment: Senator Orie indicated that the Commonwealth will need to administer both the 11th grade PSSA and the Keystone Exams for at least 2 to 3 years in order to show the longitudinal data for the Keystone Exams before it can eliminate the 11th grade PSSA.

Response: The three Keystone Exams that will be used to measure AYP will not be mandated until the U.S. Department of Education approves them for this purpose. The 11th grade PSSA and three Keystone Exams will not be administered as mandated exams together in the same school year. Districts that voluntarily choose to use Keystone Exams for graduation purposes prior to receiving approval from the federal government for AYP purposes will provide a sufficient data sample to meet criteria required.

Comment: In subsection (f)(5), IRRC questioned whether providing end-of-course exam scores no later than 10 calendar days prior to graduation is a reasonable time frame, given the administrative procedures that go into preparing a school for graduation.

Members of the public expressed concern that the timing in scoring test results could pose a problem if the student takes any one of these tests in his/her senior year and fails it close to the graduation date. Feedback should be timely, accurate and formative. Current experience with the PSSA underscores this need in that the option for retesting using the PSSA does not permit test results to be returned in time to provide remediation in the needed areas before the 12th grade re-test is administered.

Additional and somewhat contradictory public comment suggested that the tests be administered in early November, at the end of January, early April, early June and early August to coincide with semester courses and summer school schedules. Ideally, five opportunities per year would be preferable to align with single nine-week term courses.

Other timing issues include the administration of the Advanced Placement or International Baccalaureate exams, which are given in May of each year. Their respective Boards predetermine the days and dates. Results for the exams are issued in July. Advanced Placement and International Baccalaureate exams are typically taken by

students in their junior or senior years. High schools determine student failures, summer school requirements, etc before this time. Graduation occurs prior to June 30th and scores are not even realized at that time. Advanced Placement exams are scored as a 0, 1, 2, 3, 4, or 5. How is this converted fairly to a percentage score to be utilized as a grade for determining a student's final grade in a course?

With respect to the revised proposal referred to as "Keystone 2.0," comments from the public expressed the concern that since some students can take Algebra 1 in 6th, 7th, 8th or 9th grade depending on their math ability and implementation of a final exam for Algebra I means test administration will occur at four different grade levels each year. Additionally, some of the students scheduled to graduate in 2015 (incoming 7th graders who would be subject to these new requirements) have already taken or will take Algebra I before the new "final exam" is developed.

Response: A majority of students in most schools will have demonstrated proficiency in many of the required subjects before their senior year and the administrative burdens associated with end of year testing of seniors will be limited in most cases. Additionally, the situation created by this rulemaking is no different than a situation that could occur under the current requirements where a student would fail a final exam that is graded close to graduation. Under this scenario, students would also have the opportunity to reach proficiency during summer school as they currently do. The Board envisions few students experiencing this problem.

Students who take classes for which end-of-course exams or locally-developed assessments have not yet been put in place are grandfathered as having met the requirements.

The final form regulation also includes language allowing school districts or AVTSs to request the department approve alternative test administration and scoring timeframes. All requests shall be approved unless contrary to standards of test validity and scoring.

Finally, the rulemaking calls for students to be tested immediately after the completion of their course – resulting in fairer testing and closer alignment between instruction and assessment.

COST

Comment: The House Education Committee expressed concerns that the regulatory analysis does not fully reflect the overall fiscal impact to school districts and the Commonwealth – that a more thorough and detailed analysis of the costs, including remediation costs, needs to be provided. The IRRC echoed this concern and added that the Board should quantify costs for the validation of local assessments. IRRC also asked the board to include the cost of potential litigation when calculating the fiscal impact of its proposal.

Public comments also questioned cost estimates to school districts to revise their curriculum, conduct professional development, test development and validation, test preparation and administration, remediation and other costs.

Senator Orie expressed concerns about the costs to validate the end-of-course exams in addition to the Commonwealth's share of half of the costs for validation of local school assessments. The Senator also expressed concerns about the need for the state to set up a new bureaucracy for validating assessments and scoring project-based assessments.

Public comments also expressed the concern that the current proposal could have significant economic impact on school districts operating under Act 1 fiscal restraints. Finally, public comment argued that resources could be more wisely spent on educational initiatives designed to raise student achievement.

Response: In significant ways, this regulation responds to concerns about fiscal impact to school districts:

- The state will assume costs associated with developing, administering and scoring end-of-course exams;
- The state will assume costs for the development of instructional diagnostics and the voluntary model curriculum;
- The state will develop project-based alternative assessments;
- The cost to validate local assessments will be evenly divided between the state and school districts and, upon request, the Department will provide technical assistance to school districts in developing local assessments.

Additionally, schools currently have strategic planning processes, professional development systems, curriculum review and development processes, assessment systems and processes to monitor instruction and student progress. These components provide school districts and AVTSs with the foundation to integrate and implement Chapter 4 requirements.

Moreover, districts already have considerable state resources to support this work, including Basic education funding (2008-09 enacted: \$5.23 billion), Accountability Block Grant (08-09 enacted: \$271.4 million) and Education Assistance Program funding (08-09 enacted: \$65.1 million). In 2008, the legislature also enacted a school funding formula, setting a goal in law to meet the state's responsibility for helping all school districts achieve a resource level based on what is needed for student success. These resources could offset supplemental instruction (estimated average per-student cost: \$600) and also fund district- and building-level management of the project-based assessment established under 4.51(n)(1). Districts will have considerable flexibility in the design and implementation of supplemental instruction.

Districts that elect to use a locally-developed graduation requirements system will be required to have the system independently validated every six years; as discussed

above, the costs for validation will be split evenly between the district and the state. Based on estimates from the Center for Assessment (Dover, NH), local assessment reviews are expected to cost \$2,500 to \$7,500 per district, depending on the format and quantity of materials submitted (district costs would range from \$1,250 to \$3,750). It is estimated that review of a district's local assessment system by a regional panel would take approximately one day to complete. Cost assumptions are based on 200 local assessments systems in 2009-10, with an average validation cost of \$5,000 per district (\$2,500 district share) with the number of districts utilizing local assessments declining by 50 per year through 2013 as new resources become available.

By utilizing the Keystone assessments, model curriculum and instructional diagnostics, districts may be able to reduce local efforts and expenditures relating to test development and scoring, curriculum development, and out-of-school remediation for struggling students. It is difficult to estimate these savings precisely; districts may utilize these resources in a variety of combinations, and savings will vary significantly based on a district's framework of curriculum, instruction and assessment. What can be estimated is savings that will result from a series of state developed end-of course finals.

Penn State's study of local assessments found that fewer than 4 percent of districts have developed systems that can yield "valid measures of proficiency" and nearly half of districts received the lowest possible score for practices related to administration and use of local assessment scores for graduation. Absent this regulation, districts would be expected to strengthen or develop local assessments to ensure valid measures of proficiency for purposes of graduation.

Based on estimates from the Center for Assessment, these test development costs could easily exceed \$25,000 per assessment. Refining this estimate depends on a number of variables, including the size of the district, assessment format (e.g., a test comprised solely of constructed response times is less expensive), faculty and staff experience with educational measurement, and availability of tools such as electronic scoring devices. Districts will face both near-term start-up costs (e.g., developing a sufficient item bank for each assessment) and ongoing costs associated with printing, scoring and reporting.

By assuming all costs associated with Keystone exam development, scoring and reporting, the state will ensure statewide district-level cost savings of at least several million dollars annually.

The majority of anticipated costs to the state are identified in the contract that will guide development of ten end-of-course exams (algebra I and II, geometry, biology, chemistry, literature, U.S. history, world history, civics and government), model curriculum, and instructional diagnostics. Costs through 2014: \$145,000,000.

The state will fund development and regional scoring of project-based assessments – an alternative path to graduation based on the Maryland Bridge Plan for Academic Validation. Maryland uses grant funding – approximately \$50,000 annually – to convene educator panels to develop the projects. The Department is estimating costs

of approximately \$200,000 annually for project development and scoring, beginning 2010-11.

The state is responsible for organizing three committees: the state assessment validation advisory committee, the local assessment validation advisory committee, and an advisory committee for the development of performance-level descriptors and cut scores. Estimated costs for administration, travel reimbursement, and release time for members (e.g., reimbursing districts for the cost of substitutes): \$30,000 annually.

The department will conduct a series of validity studies on the algebra I, literature, and biology Keystone exams which together will serve as the state's high school level accountability system for purposes of NCLB. Estimated cost: \$150,000 (cost incurred in FYs 2010-11, 2011-12, and 2012-13).

In addition, once all Keystone exams have been developed, the department will contract with a qualified vendor to perform a validity study of the Keystone exams every five years. Estimate: \$250,000, costs incurred no earlier than FY 2016-17. (The cost of the State Board's 2005 PSSA validity study by HumRRO was approximately \$175,000; however, this study did not include convergent validity, which will be a component of the Keystone validity study.)

The state will share costs associated with the validation of local assessments. As discussed above, the department estimates local validation costs to range from \$2,500 and \$7,500 per district, for an average state share of \$2,500 per district.

The department will seek approval from the U.S. Department of Education to replace the 11th grade PSSA and 12th grade retest with three Keystone exams for use as the state's single accountability system under NCLB. As a result, the department will save approximately \$5 million annually, beginning 2012-13, through reductions to an existing contract with Data Recognition Corporation.

With respect to projecting the potential cost of litigation against the Commonwealth or local school districts, it is important to note that the majority of states that have instituted high school graduation testing have not faced litigation and there has not been litigation challenging the Commonwealth's authority to administer the PSSA. In addition, the alternatives and protections included in this regulation (e.g., multiple opportunities to retake tests, provisions for supplemental instruction, project-based alternative assessments, waivers for extenuating circumstances, accommodations and adaptations for special needs students) will help guard against litigation.

MISCELLANEOUS COMMENTS

Comment: The House Education Committee expressed concerns that the two state assessments, the PSSA and the end-of-course assessments, are not equivalent in terms of academic content assessed. The PSSA measures broad content of the academic standards while end-of-course exams are based on specific course content. Additionally,

commentators expressed concern that school districts may use Advanced Placement and International Baccalaureate tests for graduation purposes – assessments which are not aligned with Pennsylvania's academic standards, nor are they comparable with the other three testing options. Commentators asked for clearer, more detailed explanation of how these various assessments will be made equivalent so that all students are assessed on the same academic standards. Finally, concern has been raised about the alignment of numerous grading scales used by teachers.

Response: Both the PSSA and Keystone Exams are based upon the state academic standards. The Keystone Exams are end-of-course tests administered at the time students learn the academic content. Because they assess course content, they are able to assess the depth of student knowledge in the subject far better than the PSSA. As a comprehensive exam--a test that assesses a broad range of content--it can only measure a relatively small sample of student knowledge. Through the use of multiple course assessments administered throughout a student's secondary education, Keystone Exams will provide improved measurement of student knowledge and skills over that provided by the PSSA. The Board believes that when the full slate of Keystone Exams are used, they share a considerable proportion of the content tested by the PSSA. Likewise, although AP/IB exams are not specifically aligned with state standards, there is sufficient coverage to warrant their use. In addition, AP/IB offers an alternative the Board recognizes as well respected across the nation and throughout the world and therefore accepts these programs as sound alternatives to meeting minimum state requirements.

Comment: A commentator suggested that the State Board of Education issue a state level diploma to those students who pass the PSSA and GCA's. Students who continue to pass the rigorous local assessments without passing the state level standardized assessments could still be issued the local diploma.

Response: The Public School Code of 1949 provides the authority to award diplomas to local school boards, not the State Board of Education. The State Board of Education does have authority to establish graduation requirements but does not have legal authority to award diplomas.

Comment: The IRRC indicated that a reference in Section 4.51(e) should be to 4.51(f). This should be corrected in the final-form regulation.

Response: The reference has been corrected in the final-form regulation.

Comment: The IRRC asked why the local assessment is only being compared to GCAs? Should the vendor also make comparisons to the PSSA? We have a similar concern with the language in §4.24(b)(1)(iv)(C).

Response: The provision that requires local assessments to be aligned with the Graduation Competency Assessments has been stricken from the final form regulation. Local assessments may reflect any of the options included under §4.52 as long as the assessment can be validated.

Comment: The IRRC indicated that the term "related National and State criterion referenced assessments" in subsection (b)(2)(v)(E) is vague. The final-form regulation should define this term.

Response: The term has been stricken from the final form regulation.

Comment: The IRRC asked why supplemental instruction under subsection (c) for students not scoring proficient or higher on the PSSA is required only after 11th grade? The regulation appears to be silent on requirements for supplemental instruction for students scoring less than proficient on local assessments. At what point would a school entity be required to provide supplemental instruction to these students?

Response: The final-form regulation now requires that supplemental instruction be provided to a student that fails to demonstrate proficiency on the local assessment, Keystone Exam or PSSA exam. The local assessments and courses in which Keystone Exams are administered are delivered throughout the secondary educational program. Districts will be required to provide supplemental instruction to students who fail to demonstrate proficiency starting in 2011-2012. In addition, the Department will provide districts assistance in the development of tutoring, remediation and extended instructional time programs as outlined in § 4.4(e)(2).

Comment: The Independent Regulatory Review Commission noted that the term Pennsylvania System of School Assessment is not defined in the regulation and recommend that it be added to the final regulation.

Response: The term Pennsylvania System of School Assessment test is defined in the Public School Code of 1949 (24 P.S. 1-102 relating to definitions) and *PSSA* is defined in 22 Pa Code 4.3 (as amended, February 15, 2008).

Comment: The Independent Regulatory Review Commission asked why the Board hasn't included a similar provision for GCAs that it has for PSSAs relating to making samples of assessment questions, instrument formats and scoring guides available to the public after each administration of the PSSA.

Response: These items are basic tenets of sound, reliable and transparent test administration. The Department provides far more information about the PSSA to the public than is listed in the regulation. The Board does not believe additional regulatory provisions are necessary.

Comment: The Independent Regulatory Review Commission stated that the regulation should include a definition for the term "module."

Response: As defined in Webster's Ninth New Collegiate Dictionary, the term "module" is defined as "an educational unit which covers a single subject or topic."

Since the term is adequately defined in a general use dictionary, it is unnecessary to include the term in the definitions section of the regulation.

Comment: The Independent Regulatory Review Commission indicated that in subsection 4.51(f)(7) the word "may" should be changed to "shall" in that GCAs are designed into modules.

Response: This change was made in the final form regulation.

Comment: With respect to language in 4.51(f)(8) stating that the department will provide guidance to school entities as to accommodations for students with disabilities and English language learners (ELLs), the Independent Regulatory Review Commission stated that this is non-regulatory language that does not provide the regulated community with a clear understanding of their obligations or the potential costs associated with administering this provision. IRRC indicated that the final-form regulation should provide clear and binding standards for how schools will accommodate the needs of special education and ELL students with respect to administration of the GCAs and any resulting remediation. Other commentators expressed a concern that the regulation should outline specific requirements for the provision of adaptations and accommodations for diverse learners. The collective objective should be that every student who needs testing accommodations to demonstrate proficiency of the standards receives those accommodations. But not every student with disabilities or every English language learner will need accommodations, and we should be sure not to create a new "back door" to high school graduation. The regulation should specify the conditions under which students require accommodations and the nature of the accommodations based upon the needs of the students.

Response: For assessments used to determine AYP under the federal No Child Left Behind Act (NCLB) the Commonwealth must adhere to the requirements set by the U.S. Department of Education. Based on these requirements the Department provides guidance to schools, parents and others. Guidance is already provided to school districts which is available on the Department of Education web site.

Accommodations currently exist both for those students listed in this provision and all other students such as extended testing time. Students with disabilities have IEPs that should include testing accommodations necessary for the student to maximize their achievement. The same applies for students who are gifted. Accommodations can be addressed in each student's GIEP. The Department of Education has published documents describing the accommodations for special education students, students with 504 plans and English language learners. Different accommodations are currently provided to English language learners when they take the PSSA. Again, the Board anticipates that similar accommodations will be provided to English language learners when they take the Keystone Exams. The Board believes, given existing federal standards, Department guidance and professional development and technical assistance already provided to school districts, that additional regulatory language is unnecessary.

Comment: Several commentators indicated that the proposal does not mention world languages in the proposed revisions. In order for students to be prepared for the diversity of our work force, our global society, and post-secondary careers, we, as educators, must take a serous look at education students and exposing them to diverse cultures and languages.

Response: Section 4.23(d)(3) of the current regulations stipulate that planned instruction shall be made available to every student in the high school program in world languages under §4.25 (relating to languages). Section 4.25 requires every school district to provide planned instruction in at least two languages in addition to English, at least one of which shall be a modern language, and at least one of which shall be offered in a minimum 4-year sequence in the secondary program (middle level and high school). This rulemaking does not change this requirement. In addition, several provisions in the state academic standards include standards that address world cultures, history, economics, geography and many others.

Comment: Commentators indicated that PDE should work with a truly representative advisory committee of local district educators from all parts of the State and devise statewide criteria for high school diplomas. Once agreed the state could "sanction" the diplomas of those school districts that meet the criteria. Any district that meets the district's local diploma criteria could still graduate with their high school diploma. But if that district did not meet the State requirements, the diplomas for their graduates, in that year, would simply not be "State Sanctioned."

Response: The Board engaged in unprecedented outreach to solicit input from across the state in the development of the final regulations. The Board's regulations adopted in 1999 required districts, beginning in 2003, to place state seals of proficiency or distinction on the diplomas based on student performance on the PSSA. While the regulation was approved and became effective growing opposition by school boards eventually resulted in the removal of this provision. Throughout development of this regulation suggestions were made to establish a differentiated diploma that is multiple tiered diplomas based upon the level of student achievement. While the Board has authority to establish requirements that school districts must follow when establishing their graduation policies, the Board does not have legal authority to determine the type of diplomas that are awarded to students.

Comment: Members of the public indicated that the State Board should greatly expand their vision to grant proficiency for dual enrollment and college and virtual coursework. Similar comments expressed concern that the Keystone Exam proposal contains nothing about College-in-the-High School programs. The new regulations should provide the option of demonstrating proficiency by passing subject specific College-in-the-High School courses, provided that the institution is an accredited Middle States College or University.

Response: The Board believes that in most cases, students who participate in dual enrollment and college- in-the-high school programs will have already taken the courses

and demonstrated proficiency as necessary to meet state graduation requirements before they enroll in college level courses.

Comment: Public comments suggest that students who score proficient or higher on all components of the 11th grade PSSA should be granted automatic acceptance in to the State System of Higher Education.

Response: The State Board of Education does not have the authority to grant students automatic acceptance into a campus of the State System of Higher Education. The Public School Code of 1949 provides that authority to the Board of Governors of the State System of Higher Education and presidents of the 14 State System Universities.

Comment: Public comment requested language be added in Section 4.4(e)(2) regarding assistance in the interpretation and use of student assessment data in targeting supports at individual student needs, focusing on specific areas of student weakness rather than requiring repetition of entire courses or grades unless individual students need such repetition, and using resources effectively.

Response: School districts may design their own strategies for meeting each student's individual needs. The Department has in the past and is expected to continue to provide professional development on data driven instruction and related issues. The final form rulemaking provides flexibility to allow each school district to decide how each student shall be given instruction, remediation and targeted supports to meet the requirements.

Comment: A commentator suggests that the framework for standards and assessment does not support either course curriculum or course assessments. That current state standards are too general and do not provide enough guidance for the specific goals of the proposed courses. The history standards have been given a failing rating by outside organizations because they are unwieldy, unclear, fragmented and lack specific goals and content needed to develop and design history courses at the high school level. The standards would need to be totally revised and redesigned so as to be "instructionally sensitive" and focused.

Response: The PSSA are currently developed around assessment anchors that are more specific than the standards. They are a subset of Board's standards and define the content to be assessed on the tests. Assessment anchors provide focus and clarity, they integrate standards statements and they align the standards to the curriculum. In addition, the Board has begun the process of reviewing and updating the state academic standards. Since the state standards are contained in appendices to Chapter 4, any changes to the standards will be required to go through the regulatory review and approval process. The regulation requires the Department to develop and offer for district use a voluntary model curriculum that is aligned with the content assessed by the Keystone Exams. This will provide schools, whether or not they choose to adopt the curriculum, clear information about the content that will be assessed by the Keystone Exams.

Comment: Public comment requested clarification on which Keystones will be required for graduation. Comments questioned why students should have three options for social studies and suggested that perhaps the American history GCA should be the only requirement? Why not require three social studies? Why require either science?

Response: The high school graduation requirements contained in the final form rulemaking comprise the minimum requirements that both the Governor's Commission on College and Career Success and the State Board felt students need to achieve. The Board also feels it is important to provide students several courses and options to demonstrate proficiency in math, science and social studies. Other commentators expressed concern that the requirements are too limiting on students, that it narrows their choices.

Comment: Public comment indicated that the Board should provide more guidance as to the nature of the supplemental instruction called for in the proposed regulations, set a date certain for implementation, and provide accountability for district compliance and protections for students.

Response: The language in section 4.24(i) has been changed to indicate a date certain for the implementation of supplemental instruction for students who do not demonstrate proficiency in the relevant. The final form rulemaking also stipulates that the instructional support must help the student attain proficiency in the state academic standards.

Comment: Several commentators indicated that the proposed regulations should also require each Keystone exam to include questions that enable students to provide thoughtful answers to open ended questions and solve complex problems by "showing their work."

Response: A substantial portion of the test items on each Keystone exam will be devoted to performance items that allow students to demonstrate knowledge and skills by showing their work.

Comment: A commentator asked if the General Education Diploma (GED) would be changed.

Response: The GED will not change. Those standards are set by the federal government. In addition, Section 4.72 (relating to credentials other than the high school diploma) is unchanged by this rulemaking.

Comment: In comments submitted by Senator Orie, she suggested the Keystone Exams are voluntary in name only – that in order to comply with federal requirements, all school districts will be required to administer four Keystone Exams (Algebra I, literature, science, and writing).

Response: Only the 11th grade reading and math PSSA exams are required to meet federal requirements to determine AYP at the high school level. NCLB also requires that science be assessed at the high school level, though performance on the science assessment is not used to determine AYP. The PSSA predates federal NCLB requirements. The 11th grade PSSA writing assessment was created under state, not federal requirements. Therefore, in order to comply with federal NCLB testing requirements, only the three Keystone Exams in reading, math and science are necessary. All schools would be required to administer these three tests to determine AYP, beginning 2012-13. The use of these assessments for purposes of determining student readiness for graduation is voluntary. Districts may choose to use some, all or a combination of Keystone Exams, validated local assessments or AP/IB exams to determine student readiness for graduation.

State Board of Educati Public Comment Reg. #00		<u> </u>	· · · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·			
Name		Entity	Street	City	Stat	Zip	Email
May 23 2008 1 Patty Crandall	PPC		1697 Northgate Dr	Pittsburgh	DΛ	15041	pattycrandall@aol.com
2 Janine Massenburg	PPC		1138 Longwood Dr	Quakertown	PA		jmassenburg@melc.org
3 John Lester	PPC		RR3 Box 11D	New Milford	PA		jubprob@susqco.com
4 Matt Luchansky	PPC		2213 Claymont Dr	Quakertown	PA		matt.luchansky@novickbrothers.cor
5 Barb Keefer 6 Carol Martin	PPC PPC		626 Washington Ave Baeder & Hilltop Rds	Uniontown Jenkintown	PA		barbjk5_3@yahoo.com carol.jdn@verizon.net
7 Marisol Ocasio	PPC		41 E Union Blvd	Bethlehem	PA		fowler@lvchildcare.org
8 Robin Moye	PPC		2400 Darlington Rd	Beaver Falls	PA	15010	chipnoahsark@verizon.net
9 Carol Goertzel	PPC		310 Amosland Rd	Holmes	PA		cgoertzel@pathwayspa.org
10 Aldine Coleman 11 Robert Cicco	PPC PPC		3003 Gilmore Ave 2015 Swallow Hill Rd	Penn Hills Pittsburgh	PA PA		acoleman@musa1.org tririver@comcast.net
12 Richard Scaglione	PPC		303 Union St	Monongahela			rlscaglione@verizon.net
13 Christina Reynolds	PPC		105 Spring St	Wilkes-Barre	PA		happytheatrehippie@yahoo.com
14 Stephanie Zangwill 15 Kim McClure	PPC PPC		621 Kelly Lane 138 N Mary St	Glenside Lancaster	PA PA		sunshine387@juno.com kim mcclure@iu13.org
16 Millie Berg	PPC		2005 Mt. Vernon St	Philadelphia	PA		millieberg@comcast.net
17 Pat Bittner	PPC		9906 Lorry Place	Philadelphia	PΑ	19114	patbittner@hotmail.com
18 Bronwyn Carlson	PPC		4611 Pechin St	Philadelphia	PA		bronwyndc@yahoo.com
19 Doreen Damskov 20 Wayne Jones	PPC PPC		69 North Main St 1287 Lakemont Dr	Carbondale Pittsburgh	PA		dordam@nep.net waj97@yahoo.com
21 Natasha Farreil	PPC		224 Lampman St	Avoca	PA		farrelltnt@aol.com
22 Mary Lou Bitar	PPC		106 Mohawk Dr	Amold	PA		mlbitar@earthlink.net
23 James Nelson 24 Patricia Giles	PPC PPC		1458 Rt 6 West PO Box 702	Roulette Reading	PA PA		old.60.james@zitomedia.net patgiles@uwberks.org
25 Nancy Hagenbach	PPC		2635 N. 4th St	Philadelphia	PA		providencecenter@verizon.net
26 Beverly Duncan	PPC		2352 N. Cleveland St	Philadelphia	PA	19132	bduncan@holyredeemer.com
27 Barbara Tokatz	PPC		1766 Running Deer Dr	Auburn			bpt9@venzon.net
28 Tameka Rice 29 Jennifer Wolford	PPC PPC		104 Hamilton St Apt 18 251 S. Prince St	Harrisburg Lancaster	PA PA		dea5311@yahoo.com
30 Julie Prey-Harbaugh	PPC		4933 Larchwood Ave	Lancaster Philadelphia			jlwolford@lancaster.k12.pa.us j.preyharbaught@gamil.com
31 Charlotte Pletcher	PPC		100 Lakemont Park Blvd 1	st Altoona	PA	16602	cpletcher@homenursingagency.con
32 Marsha Brubaker	PPC		1925 Shiloh Dr	York	PA		mebrubaker@yahoo.com
33 Joanne Wisniewski 34 Arlette Lantz	PPC PPC		RR1 Box 1272 109 Weigle Dr Suite 206	Hop Bottom Monaca	PA PA		joanne.wisniewski@keystone.edu lettylantz@comcast.edu
35 Dana Songer	PPC		301 Darrow Rd	Edinboro	PA		dsonger@ymcaerie.org
36 Thistle Elias	PPC		5421 Coral St	Pittsburgh	PA	15206	elias@pitt.edu
37 Nikia Still	PPC		2733 Cranston Rd	Philadelphia			nikia_psu@yahoo.com
38 Debra Haldeman 39 Ronald Evans	PPC PPC		446 Monroe Valley Rd 5 Greenwood Hills Dr	Jonestown Mountaintop	PA PA		moose45@comcast.net revans@csswb.org
40 Jacquelyn Gundersen	PPC		146 Deadwood Ln	Wellsboro	PA		jgundersen@laurelhs.org
41 Letty McKinney	PPC		209 Beck Rd	Sunbury	PA		mckhome@ptd.net
42 Ida H. Page	PPC PPC		2315 Perry St	Erie Bleiroville	PA		ipage@eriesd.org
43 Nancy Boyer 44 Diane Caviston	PPC		290 Gray Station Rd 167 Washington St	Blairsville Carbondale	PA PA		nancy_boyer@who-inc.org dianefollysfury@yahoo.com
45 Cindy Wolfe	PPC		PO Box 172	Harrison City	PA		cwolfepa@comcast.net
46 Tessi Melchior	PPC		301 West Spring St	Boyertown	PA		tmelchior@boyertownymca.org
47 Minturn Smith	PPC PPC	*	101 SR 1005 1043 Blake St	Tunkhannock Bethlehem	PA		mintum@epix.net
48 Yesenia Ortiz-Flores 49 Angela Claar	PPC		704 Blair St	Hollidaysburg	PA.		Campus@lvchildcare.org aclaar@nulton.com
50 Rae Johnson-Bundy	PPC		1442 Glen Moore Circle	Lancaster			raejohnsonbundy@yahoo.com
51 Devina Dukes	PPC		1833 Hoffman St	Philadelphia	PA	19145	drvlove79@yahoo.com
52 Donna Buchanan 53 Donna Jarmulowski	PPC		150 W. Beau St	Washington	PA		dlbaitimom@yahoo.com
54 Sandra Kaufmann	PPC PPC		3816 Baytree St 2828 Spear Ave	Pittsburgh Ardsley	PA		djarmulowski1@pghboe.net sandy1008@comcast.net
55 Monica Walker	PPC		5218 Sundew Terrace	Tobyhanna			child1st@ptd.net
56 Eileen Zarski	PPC		144 S. Maple St	Mt Carmel	PA		zarskie@mca.k12.pa.us
57 Shana Smith	PPC PPC		2825 S. 10th Ave	Altoona	PA		slsmith@tyrone.k12.pa.us mdickerson@ymcaerie.org
58 Melissa Dickerson 59 Amy Brown	PPC		31 West 10th St 1728 S. Church St Apt 8	Erie Allentown	PA PA		albrown79@verizon.net
60 Alison Williams	PPC		4205 Spruce St	Philadelphia	PA		awilliams@parentinfantcenter.org
61 Ann Marie Adonizio	PPC		210 Rock St	Pittston	PA		adonizan@pittstonarea.com
62 Gabrielle Smith	PPC		171 Wildflower Dr 8 Lindenwold Terrace				gabbybmd@aol.com
63 Marie Conti 64 Kathy Felty	PPC PPC		9 Colonial Dr	Ambler Lebanon	PA PA		marie@amshq.org felty@comcast.net
65 Jen Lydic	PPC		1955 Upper Ridge Rd	Green Lane	PA		j.m.lydic@comcast.net
66 Kathy Stennett	PPC		122 Wayne Dr	Harrisburg			kes21@psu.edu
67 Janice Long	PPC PPC		1900 Pioneer Ave	Pittsburgh Norristown	PA PA		janice@setoncenter.com terrapin26@yahoo.com
68 Anne Martin 69 Colleen Stulak	PPC		Swede & Airy Sts 1011 Old Salem Rd	Nomstown Greensburg	PA		terrapin26@yanoo.com colleen@unitedway4u.org
70 Margie Sebastiani	PPC		3601 Garrett Rd	Drexel Hill	PA	19026	sonshineca2003@yahoo.com
71 Linda Martin	PPC		2550 Shelly Rd	Harleysville	PA		lvmartin@comcast,net
72 Michele Nuss 73 Sue Ellen Masters	PPC PPC		36 Krols Ln PO Box 24	Honesdale Valley Forge	PA PA		Stevyn@hotmail.com smasters@paymca.org
74 Susan Howell	PPC		2313 S. Hicks St	Philadelphia	PA		susanhowell1@verizon.net
75 Marjie Mogul	PPC		84 Skyline Dr	Audubon	PA	19403	mmogul@momobile.org
76 S. McKennedy	PPC		3227 Old French Rd	Erie	PA		s.mckennedy@ssjerie.org
77 Elizabeth Jones 78 Julie Clayton	PPC PPC		2237 Huntingdon St 2724 N. 45th St	Bethlehem Philadelphia	PA PA		emjones@ptd.net mcmudda@aol.com
79 Shalynda Morton	PPC		PO Box 722	Allentown			mortons@cislv.org
80 Mattie Kendrick	PPC		402 Arch Street	Clairton	PA	15025	m_kendrick@comcast.net
81 Erica Heller	PPC		30 South Linden St	Manheim	PA		weecaremanheim@yahoo.com
82 Robert E. Feir 83 Kathy Myers	PPC PPC		2953 North Second St 1220 Aburn Ave	Harrisburg Hummelstown			rfeir@comcast.net kgmyers@papartnerships.org
84 Vickie Kolakowski	PPC		800 Constitution Blvd				vkolakowski@vpfymca.org
85 Sade Davis	PPC	•	2314 Market St 3rd flr	Philadelphia	PA	19103	sdavis@cliontheweb.org
86 Bob Long	PPC		481 2nd St				rlong@sumcd.org
87 Sharon Mast 88 Mary Ann Pease	PPC PPC		501 Washington St 32-17 Revere Rd	Reading Drexel Hill	PA PA		sharonm@uwberks.org maryann@dvaeyc.org
89 Jessica Lees	PPC		804 Yardley Commons	Yardley	PA		jessica@dvaeyc.org
90 Laura Adams	PPC		2080 Washington Ave	Lewisburg	PA	17837	ladams@csiu.org
91 Georgine Joyce	PPC		81 Old Mill Rd	Pottsville			gjoyce@childdevelop.org
92 Renee Jamison 93 Marcy Bacine	PPC PPC		3973 Boulder Dr 7102 McCallum St	Tyrone Philadelphia	PA PA		rmjamison@tyrone.k12.pa.us mbacine@mac.com
93 Marcy Bacine 94 Judi Anderson	PPC PPC		5004 Woodgate Ln	Collegeville			judi_anderson@comcast.net
95 Rodney A. Erickson	PPC		201 Old Main	University Park			rae@psu.edu
96 Paul Vincent Riley, Jr.	PPC				_		vriley2@yahoo.com
97 Peter Butler 98 Kenneth A Noil	PPC PPC		20 Anderson Acres 9604 Jacktown Rd	Tunkhannock Bangor			butler.pr@pg.com kanoll@epix.net
99 Tameka Rice	Pa Partnerships	s for Children	DOWN JACKIOWII RU	Dango	ŀΑ	13013	trice@papartnerships.org
100 Eileen McAliney	Tredyffrin/East		2429 Dickson Ln	Malvern	PA	19355	mcaliney6@yahoo.com
101 Jennifer Wessels			5				wessels@comcast.net

	Mary Ann Stabile Tom Snyder	Upper St. Clair SD	401 Bon Air Ct	Cranhom, Tun	DΛ	16066	rhstabile@uscsd.k12.pa.us tsnyder@westallegheny.k12.pa.us
	Kate Stone Reis	Tredyffrin/Easttown SD	401 BOIT All Ct	Cianbelly (wp	ГЛ	10000	katestone@comcast.net
	Nancy Brown	Brentwood Borough SD	3601 Brownsville Rd	Pittsburgh	PΑ	15227-	nbrown@brentwoodpgh.k12.pa.us
	Donna Koons Anne Marie Fletcher-Moore	Methacton SD					dkoons@methacton.org annfletchermoore@verizon.net
	Jennifer Conrad	Wilmington Area SD	300 Wood St	New Wilmington			conrad@wilmington.k12.pa.us
	Christine Connolly	Tredyffrin/Easttown SD	738 First Ave	Berwyn	PA	19132	ConnollyC@TESD.Net
111	Dona B. Redmond	Tredyffrin/Easttown SD West Shore SD					DonaAndJim@comcast.net wssd_pl@wssd.k12.pa.us
	Stan Johnson	Springfield SD		_			QSCDTS465@aol.com
	Suzanne Sirkin Lawrence A. Feinberg	Delaware Cty SB Legis Council	1034 Valley Forge Rd 2023 Ołcott Ave	Devon Ardmore			scsirkin@yahoo.com lfeinberg@thelocalgroup.com
	Judith Evangelista	Tredyffrin/Easttown SD	2023 OICOIL AVE	Aldinole	-	15005	evangelista1187@verizon.net
	Ed & Kathleen Crenny	•					ecrenny@comcast.net
	Sarah Jean David M. Rackow	Cheltenham SD					sarahajean@aol.com rackowassociates@comcast.net
	Robin McConnell		954 Cloverly Rd	Berwyn	PA	19132	McConnellR@TESD.net
	Andrea Rountree		00.4) Maradian (Dal	18/	-	40007	rountreefamily@comcast.net
	Amy McCue Gerry Jaffe'	Tredyffrin/Easttown SD	934 Weadley Rd 795 Avonwood Dr	Wayne Wayne			CMQ3@aol.com GCJaffe@aol.com
	Christine Broome	Tredyffrin/Easttown SD					broomefamily@verizon.net
	Dehlia & Ronald DeLuca	County Little ACDACD	No address/email address	laffaraan Lilla	Π.	15005	shausana@aamaast aat
	Shauna M. D'Alessandro Scott Schappell	South Hills ASDASD Tredyffrin/Easttown SD	304 Springhouse Dr 402 Chester Rd	Jefferson Hills Devon			shaunacpa@comcast.net sschappell@iagr.net
127	Deborah Miller	Tredyffrin/Easttown SD					deb8670@verizon.net
	Lisa Winigrad Deby & William Ross	Tredyffrin/Easttown SD Tredyffrin/Easttown SD					lwinigrad@hotmail.com debyross@gmail.com
	Stacy Stone	Tredyffrin/Easttown SD					svs@drexel.edu
131	Nanette Chappelear	Tredyffrin/Easttown SD					chappelear@comcast.net
	Patty Pawlow Linda Barber	Tredyffrin/Easttown SD Tredyffrin/Easttown SD					epecpawlow@yahoo.com four_barbers@yahoo.com
	Merraine B. Rein	Tredyffrin/Eastlown SD					Merraine@comcast.net
	Mark & Kate McCanney	Tredyffrin/Easttown SD					katedocmac@aol.com
	Susan Drennan Suzanne V. Domenick	Tredyffrin/Easttown SD Tredyffrin/Easttown SD					susan.drennan@verizon.net SDome21731@aol.com
	Lisa McDungali	Tredyffrin/Eastlown SD		•			Imcdugali@comcast.net
	Tara L. Pacca	Tredyffrin/Easttown SD					tabz106@comcast.net
	Mathieu Turpault Sarah Stephenson Keyes	Tredyffrin/Easttown SD Tredyffrin/Easttown SD					mturpault@bresslergroup.com skeyes393@comcast.net
	Jodi Monster	Tredyffrin/Eastlown SD					themonsterfamily@comcast.net
	Laura Hutton	Tredyffrin/Easttown SD					Hutton145@comcast.net
	Laura Woyak Sandrine Turpault	Tredyffrin/Easttown SD Tredyffrin/Easttown SD					woyak@felixmarketing.com Sandrine.Turpault@sanofi-aventis.c
	Marci Tierney	Tredyffrin/Easttown SD					marcitierney@comcast.net
147	Nancy & James Margolis	Tredyffrin/Easttown SD					nmargolis@verizon.net
	Karen M. Cruickshank Renee Mindek	Tredyffrin/Easttown SD					cruickshank01@comcast.net
	Robert & Margaret Winters	Tredyffrin/Easttown SD Tredyffrin/Easttown SD					MindekR@TESD.net MRCW55@cs.com
151	Amy George	Tredyffrin/Easttown SD	2036 Buttonwood Rd	Berwyn	PA	19312	ageorge527@yahoo.com
	Claire Witzleben	Tredyffrin/Easttown SD					clairewitz@comcast.net
	Rebecca Wein Curtis & Kerry Nelson	Tredyffrin/Easttown SD Tredyffrin/Easttown SD					becky@crwein.com candknelson@aol.com
	Jeanne & Don Braun	Tredyffrin/Easttown SD	807 Llanelly Ln	Berwyn	PA	19312	jeannebraun@aol.com
	Toni Mullen	Tredyffrin/Easttown SD					amullenfamily@verizon.net
	Sam & Dawn Morgan Dena Cara	Tredyffrin/Easttown SD Tredyffrin/Easttown SD					dsmhjmorgan@msn.com dcara3424@comcast.net
	Nicole Blagden	Tredyffrin/Easttown SD					nblagden@gmail.com
	Mary Landers	Tredyffrin/Easttown SD	2033 St. Andrews Dr	Berwyn			marich971@comcast.net
	Robin Murphy Kevin Horan	Tredyffrin/Easttown SD Tredyffrin/Easttown SD	759 Tory Hollow Rd	Berwyn	PA		rtmurphy@comcast.net jhoran1012@verizon.net
	Jennifer Horan	Tredyffrin/Easttown SD					jhoran1012@verizon.net
	Patricia A & Andrew Hino	Tredyffrin/Easttown SD					vnovacats@comcast.net
	Lisa Buraks Daniel J. & Martha M. Winters	Tredyffrin/Easttown SD Tredyffrin/Easttown SD					lburaks@yahoo.com martha.winters@wachovia.com
167	Randy & Krista Ross	Tredyffrin/Easttown SD					randy_and_krista@yahoo.com
	Karen Zelikoff	Tredyffrin/Easttown SD	657 Harwick Road	Wayne	PA	19087	zelikoff@comcast.net
	Patricia A. Genovese Janet Wolfe	Tredyffrin/Easttown SD Tredyffrin/Easttown SD					Patricia_A_Genovese@Whirlpool.cc WolfeJ@TESD.net
171	Paige Skelly	Tredyffrin/Easttown SD	1271 Karen Lane	Radnor	PA	19087	paigeskelly@comcast.net
	Dolores Howry Evelyn Shreve	Tredyffrin/Easttown SD Tredyffrin/Easttown SD					dhowry@comcast.net ewshreve@msn.com
	Gwenn Mascioli	Tredyffrin/Easttown SD					gwennmascioli@verizon.net
175	Jennifer Au	Tredyffrin/Easttown SD	3 Lakeview Circle	Berwyn	PΑ	19312	jennifer.au@umly.org
	Lawrence A. Husick Barbara McGann	•					lawrence@lawhusick.com bmcgann1@verizon.et
	27 2008						binogarii i i i i i i i i i i i i i i i i i i
178	Gregory & Laura Johnson	Tredyffrin-Easttown resident					lgj23@verizon.net
	Sarah W. Ahmann Cathleen Duffy	Tredyffrin-Easttown resident Tredyffrin-Easttown resident					kligahm@earthlink.net cathycduff@comcast.net
	Jean Donahue	Tredyffrin-Easttown resident					jdonahue393@verizon.net
182	Suzanne Henning	PPC	3527 Countryside Lane	Camp Hill			shenning2004@yahoo.com
	Bob Bold Kym Guy	Parkland SD Board Pres PPC	4315 Sand Spring Road PO Box 28847	Schnecksville Philadelphia			QVRRBold@aol.com kym6619@aol.com
	Chuck Bailard	East Penn SD Board Member	FO BOX 20047	rilladespilla	ΓM	15151	ShadowCHB@cs.com
186	Marcie Lightwood	PPC	434 Second Ave	Bethlehem			mlightwood@hotmail.com
	Megan King	Tredyffrin-Easttown resident	1460 Byrd Drive	Berwyn			mlking9@verizon.net
	Barbara Kerwin Kathy Clark	PPC Tredyffrin-Easttown resident	41 East Emaus Street	Middletown	r _A	1100/	barbara-jean@verizon.net kpgclark@comcast.net
190	Julie Wang						julie_gwang@yahoo.com
	Karen Karp	Tredyffrin-Easttown resident PPC	•				kmakarp@aol.com
	Joe Alban Hannah Harbison	Tredyffrin-Easttown resident					josepha@rcn.com hharbison@verizon.net
	Frank & Patricia Lanahan	Tredyffrin-Easttown resident					Pmisell@aol.com
	Todd & Jana Walker	Tredyffrin-Easttown resident	254 Bases A	Mashinat		1500-	janawalker@comcast.net
	Mickey Bradley Colleen Faustino Small	PPC PPC	354 Beacon Ave 3319 W. Penn Street	Washington Philadelphia			mbradley@dhs.county.allegheny.pa colleen-cmp@msn.com
	Syd Ness		o ouest			.5.20	syd_ness@comcast.net
199	Gwynn-Samblas Family	Tredyffrin-Easttown resident	4184 88-1 01 0 11 1-1	Alamai 1	۲,	40.101	gwynnfamily@verizon.net
	Guadalupe Cintron Dampman123	PPC	1 W. Main St. Suite 250	Norristown	PΑ	19401	gcintron@momobile.org dampman123@verizon.net
	Sharon Chidester	Tredyffrin-Easttown resident					smchidester@aol.com
203	Mary Lou Haughney	PPC	10521 Drummond Rd	Philadelphia	PA	19154	mhaughney@spininc.org
	Kimberly Corbi Connie Morak	6th Grade Guidance Counselor PPC	2828 Spear Ave	Ardsley	PΔ	19032	Kcorbi@umasd.org conadc2@aol.com
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	R. Griffith	Wilkinsburg SD Board Member					raygrif@verizon.net
	Debora DeVaughn	PPC	1534 Mohican Street	Philadelphia	PA	19126	debora@phmc.org
	Leanne & Daryn Rush Audrey Ho	Tredyffrin-Easttown resident Tredyffrin-Easttown resident					rushhouse@comcast.net audreycho@yahoo.com
	Tabatha Amereihn	PPC	9850 Chapel Church Rd	Red Lion	PA	17356	Tab35@comcast.net
	Mary Putt	Tredyffrin-Easttown resident					mputt@mail.med.upenn.edu
	Jeanne Choplick	PPC	RR 2 Box 2052	Dushore	PΑ	18614	kidsontrack@epix.net
	Tameka Rice	PPC					trice@papartnerships.org
	Brian Wanbaugh	-	05.11-				bwanbaugh@gdrs.com
	Annemarie Carl Marion Rowland	PPC Tredyffrin-Easttown resident	25 Naus Way	Bloomsburg	PA		gtleam@pa.metrocast.net Mrowlan@MCCUS.JNJ.com
	Dr. Stephen Jones	rredymin-castlown resident					stephenjoness@rcn.com
	Anita Street	PPC	700 Veroncia Drive	Penn Hilfs	PΑ		cachefatdaddy3@msn.com
	Lois Horn				.,,		lhorn@colonialsd.org
220		East Allegheny School Board					Isedlak@eawildcats.org
	Sandie Nicholson	Tredyffrin-Easttown resident					sandiekev@comcast.net
	Richard L. Cohen						rlcohen1235@msn.com
	Lois Hann	PPC					I-hann@hotmail.com
224	Drive Dellais	Lake Lehman School Board					mchalej@lake-lehman.k12.pa.us
	Brian Pollak Charles E. Barrett						bpollak52@hotmail.com ebarrett@yesbank.com
	Sheryl Loos	Tredyffrin-Easttown resident					Sheryl.Loos@ge.com
	Wynne Wilking	nedymm-Lastown resident					wynne_wilking_carr@vanguard.com
	Allison MacGahan						ptomomcr@comcast.net
230	Brian & Deborah Bodo	Tredyffrin-Easttown resident					Thebodofamily@comcast.net
231	KBRJ						KBRJ@aol.com
	Natalye Delegal	PPC	504 North 34th Street	Philadelphia			enddee46@comcast.net
	Don Bell	Northern Lebanon SD	345 School Drive	Lebanon		17026	
234		Northern Lebanon SD Board	345 School Drive	Lebanon		17026	
235 236		Huntingdon Area SD Board North Hills SD	2400 Cassady Ave Ste 2 135 6th Ave.	Huntingdon Pittsburgh		16652 15229	
	Debra J. Babirad	Bentworth SD Board	150 Bearcat Drive	Bentleyville		15314	
	Roseann B. Nyiri	Springfield Twp SD Board	1901 East Paper Mill Road.	Oreland			roseann_nyiri@sdst.org
239		Center Area SD Board	160 Baker Road Ext.	Monaca		15061	_ ,
	Michael J. Masko	Centennial SD Board	433 Centennial Road	Warminister		18974	
241	Maddox B. Stokes	Reynolds SD Board	531 Reynolds Road	Greenville			mstokes@reynolds.k12.pa.us
	Harry C. Mathias, Jr.	Central Columbia SD	4777 Old Berwick Road	Bloomsburg		17815	
243		Warwick SD Board	301 W. Orange Street	Lititz		17543	
244		Methacton SD Board	1001 Kriebel Mill Road	Norristown		19403	
	Alan T. Vandrew Bonnie Karwat	Mechanicsburg Area SD Board	100 East Elmwood Ave.	Mechnicsburg Elverson		17055 19520	
246	Bonnie Karwat	Central Columbia SD Board	267 Huntsfield Drive 4777 Old Berwick Road	Bloomsburg		17815	
	Joan Benso	Pa Partnerships for Children	116 Pine Street Ste 430	Harrisburg		17101	
	28 2008	ra rattlerships for Criticity	1101 life Offeet Ste 400	riaitisbuig	1.7	17 101	
	Eileen Hoban	PPC	411 Woodcrest Road	Wayne	PA	19087	ehoban@verizon.net
	Nancy J. Zeller-Landau	Tredyffrin-Easttown resident		•			nzlandau@aol.com
251	Warren C. Bulette		1775 S. Queen St.	York	PΑ	17403	bulette@juno.com
	Linda Bartleson						Linbee31@aol.com
	Mary Ann Bentz		733 N. Penna, Ave.	Yardley	PA	19067	maben730@aol.com
	Maria Delany	Tredyffrin-Easttown resident	84 Sioux Road	New Britain	D4	10001	mariadelany@comcast.net
	Carol Aubin 8 2008		64 Sioux Road	New Dittain	PA	10901	CAubin1025@aol.com
	Mary Davidson						william_and_mary@verizon.net
	Gloria del Vecchio	PPC	614 Crown Street	Morrisville	PA		Tmmr870@cs.com
	Lynda Spencer	Tredyffrin-Easttown resident					comwu@hotmail.com
259	Kris Koseski						Disney6005@aol.com
	Cath S						cs61563@yahoo.com
	Don Ivey						donivey1@verizon.net
	Cindy Arbaugh						arbcin@faresources.net
	Raymond Ostrowski Marybeth Sullivan-Rose		7 Brooks Bend	New Hope	DΛ		rostrowski716945@verizon.net mbsr3@comcast.net
	Cheri Spera	PPC	/ Blocks Beild	New Hope	-		cjspera@comcast.net
	Stephanie Thibault	Tredyffrin-Easttown resident	•				stef423@verizon.net
	Beth Pedersen						Beth_Pedersen@msn.com
268	Jianchao Li	Tredyffrin-Easttown resident					jianchao_li@yahoo.com
	Rita Patchan	ACHD Air Quality Program	301 39th Street	Pittsburgh			Rpatchan@achd.net
	Heidi Nothdurft	Life's Work of Western PA	1323 Forbes Ave	Pittsburgh			hnothdurft@lifesworkwpa.org
	Carol Detweiler Gerry L Turner		2941 Lutheran Road 1201 South Pine St	Gilbertsville York			caroldetweiler@comcast.net gturner3311@juno.com
		Tredyffrin-Easttown resident	1201 South Pine St	YORK	PA		TEColeman@aol.com
	Thomas E. Colman Kelly Bistline	nosymmetasaown resident					beyondthesunset@comcast.net
	Danyli S. Lockett	Tredyffrin-Easttown resident					Ziplockett@aol.com
	Jackie Brautigam	Tredyffrin-Easttown resident					mishko212@aol.com
	Kathy Dearborn						mkdearbom@verizon.net
278	Linda A. Martin		1448 West Broad Street	Quakertown			lindaamartin@cbheritage.com
	Eileen B. Abruzzi	Whitehall-Coplay SD Board	2940 MacArthur Road	Whitehall			haasn@whitehallcoplay.org
	Marcy Bergin		908 Tallmadge Drive	West Chester	PA		theberginbus@verizon.net
	9 2008 Carol Diobl	Tredyffrin-Easttown resident					ccdiebl81@iupo.com
	Carol Diehl Carolyn A. Boice	Pine-Richland SD Board	702 Warrendale Rd	Gibsonia	PΔ	15044	ccdiehl81@juno.com cboice@pinerichland.org
	Shauna M. D'Alessandro	West Jefferson Hills SD Board	835 Old Clairton Rd	Jefferson Hills		15025	220.00@piiloiloiloiloiloig
	Jeremy Groff						jgroff@cdschools.org
	Lisa Loomis	PPC	352 Main Street	Forest City	PΑ	18421	lloomis@keystone.edu
286	Michele and Stephen Loose	Tredyffrin-Easttown resident		-			shapaityl@comcast.net
	Margaret F. Brown	Garnet Valley SD Board					brownm@garnetvalleyschools.com
	Elliott Seif	•					elliottseif@verizon.net
	Pam Freidhoff						freidhof@NFDC.NET
	Pamela M. Mase	Fort LeBoeuf SD Board	P.O. Box 810	Waterford	D٨	16441	pntmase@comcast.net robertsr@fortleboeuf.net
	Michele B. Campbell William J. Bartle	PPC .	1530 Amherst Court	Mechnicsburg			wbartle@verizon.net
	Tara Purcell	PPC	151 Chestnut St	Kulpmont			purcelit@mca.k12.pa.us
		PPC					infinity@innemet.net
	Naume Deardon	PPC	1420 Charles Rd	Lake Ariel	PA	18436	douglasphenry@comcast.net
	Nadine Deardorff Diane Henry						DonnaRoss@PACSES.com
295				Glenshaw	PΑ	15116	Hohlwegj@sasd.k12.pa.us
295 296	Diane Henry	Shaler Area SD Board	1800 Mt. Royal Blvd				
295 296 297 298	Diane Henry Donna Ross Jeanne Hohlweg Jackie Clouser	PPC	1800 Mt. Royal Blvd 2713 W. Chestnut Ave	Altoona	PA		jclouser@lilypondcdc.org
295 296 297 298 299	Diane Henry Donna Ross Jeanne Hohlweg Jackie Clouser Ray G. Shaffer	PPC PPC	2713 W. Chestnut Ave	Altoona	PA	16602	
295 296 297 298 299 300	Diane Henry Donna Ross Jeanne Hohlweg Jackie Clouser Ray G. Shaffer Kathryn L. Orban	PPC	2713 W. Chestnut Ave 1800 Hollywood Dr	Altoona York	PA PA	16602 17403	jclouser@liiypondcdc.org RShaf5142@aol.com
295 296 297 298 299 300 301	Diane Henry Donna Ross Jeanne Hohlweg Jackie Clouser Ray G. Shaffer Kathryn L. Orban Jeremy Barnes	PPC PPC	2713 W. Chestnut Ave 1800 Hollywood Dr 1722 Union Church Rd	Altoona York Seven Valleys	PA PA PA	16602 17403 17360	jclouser@lilypondcdc.org
295 296 297 298 299 300 301 302	Diane Henry Donna Ross Jeanne Hohlweg Jackie Clouser Ray G. Shaffer Kathryn L. Orban Jeremy Barnes Beverly A. Baynes	PPC PPC York Suburban SD Board	2713 W. Chestnut Ave 1800 Hollywood Dr 1722 Union Church Rd 115 Ivyside Dr	Altoona York Seven Valleys York	PA PA PA PA	16602 17403 17360 17402	jclouser@liiypondcdc.org RShaf5142@aol.com
295 296 297 298 299 300 301 302 303	Diane Henry Diane Ross Jeanne Hohlweg Jackie Clouser Ray G. Shaffer Kathryn L. Orban Jeremy Barnes Beverly A. Baynes Sandra Lane	PPC PPC York Suburban SD Board Tunkhannock Area SD Board	2713 W. Chestnut Ave 1800 Hollywood Dr 1722 Union Church Rd 115 Ivyside Dr 41 Philadelphia Ave	York Seven Valleys York Tunkhannock	PA PA PA PA PA	16602 17403 17360 17402 18657	jclouser@liiypondcdc.org RShaf5142@aol.com
295 296 297 298 299 300 301 302 303 304	Diane Henry Donna Ross Jeanne Hohlweg Jackie Clouser Ray G. Shaffer Kathryn L. Orban Jeremy Barnes Beverly A. Baynes Sandra Lane Paul O. Cerrar	PPC PPC York Suburban SD Board	2713 W. Chestnut Ave 1800 Hollywood Dr 1722 Union Church Rd 115 Ivyside Dr 41 Philadelphia Ave 201 Kiester Rd	York Seven Valleys York Tunkhannock Slippery Rock	PA PA PA PA PA PA	17403 17360 17402 18657 16057	jclouser@liiypondcdc.org RShaf5142@aol.com
295 296 297 298 299 300 301 302 303 304	Diane Henry Diane Ross Jeanne Hohlweg Jackie Clouser Ray G. Shaffer Kathryn L. Orban Jeremy Barnes Beverly A. Baynes Sandra Lane	PPC PPC York Suburban SD Board Tunkhannock Area SD Board Slippery Rock Area SD Board	2713 W. Chestnut Ave 1800 Hollywood Dr 1722 Union Church Rd 115 Ivyside Dr 41 Philadelphia Ave	York Seven Valleys York Tunkhannock	PA PA PA PA PA PA	16602 17403 17360 17402 18657	jclouser@liiypondcdc.org RShaf5142@aol.com
295 296 297 298 299 300 301 302 303 304 305 306	Diane Henry Donna Ross Jeanne Hohlweg Jackie Clouser Ray G. Shaffer Kathryn L. Orban Jeremy Barnes Beverly A. Baynes Sandra Lane Paul O. Cerrar	PPC PPC York Suburban SD Board Tunkhannock Area SD Board Slippery Rock Area SD Board CPWDC	2713 W. Chestnut Ave 1800 Hollywood Dr 1722 Union Church Rd 115 Ivyside Dr 41 Philadelphia Ave 201 Klester Rd 1610 Industrial Blvd 550A	York Seven Valleys York Tunkhannock Slippery Rock Lewisburg	PA PA PA PA PA PA	17403 17360 17402 18657 16057 17837	jclouser@liiypondcdc.org RShaf5142@aol.com

		·					
308	Donald G. Warner	Upper Moreland Twp SD	437 Tanner Road	Hatboro	PΑ	19040	d.g.warner@comcast.net
	Martin McGurrin		536 Wheeler Ave	Scranton	PA		marty.ccpi@epix.net
	Twila Good Jeanette Peterson		1046 North Duke St	York	PA	17404	tgood@yorkcpc.org
	Robin Wilson			East Berlin	PA		Jhlirtwn@aol.com wilson@pa.net
	Virginia Wieder			2001 201111			vwieder@nauticom.net
	Cathi Berkey		74 Suffolk Rd	Harrisburg	PΑ	17112	cberkey@state.pa.us
	lolanda Spruhde	200	00 D h D	10h	-	47050	ispruhde@verizon.net
	Diane P. Barber Elizabeth Zellner	PPC PPC	22 Bayberry Drive 234 W. Thirwell Ave	Mechanicsburg Hazelton	PA		dpbarber@verizon.net missliz5507@gmail.com
	Karen S. Downie	Bethlehem-Center SD Board	194 Crawford Rd	Fredericktown		15333	
	Lauren Kraske						Lkraske@Hatboro-Horsham.org
	Lorenzo Canizares		730 North Highlands Dr.	Harrisburg	PA		canizar@verizon.net
	Brenda Rios	PPC	1507 68th Ave.	Philadelphia Wellsboro	PA		rios1507@yahoo.com
	Cynthia Boyce Phil Waber	Wellsboro Area SD Board Wellsboro Area SD	227 Nichols Street 2 Charles Street	Wellsboro	PA PA	16901 16901	
	Lisa Feil	Wellsboro Area SD	10 Sherman St.	Wellsboro	PA	16901	
325	Monty Neil	Fair Test	342 Broadway	Cambridge	MA		monty@fairtest.org
	Jennifer DiRocco		12 Collidge Ave	Sellersville	PA	18960	
	Cheryl Rose	Lackawanna Trail SD Board	7 Brinker Drive	Doylestown	PA	10890	
	Frank Tylutki Mrs. White	Lackawarina Trail SD Board	P.O. Box 85	Factoryville	PA	18419	
	Kristine Vivirito						dsv8771@yahoo.com
	Jamie A. Caffier	Central Dauphin East HS					loyalcustomer@verizon.net
	Ron Tyson			Port Allegany	PA		ty4rj@shentel.net
	Diane Basty	Hampton Township SD	829 Paoli Pike	Mast Charter	Б.	19380	dbasty50@verizon.net
	Pauline A. Bachtle Karen Nash	West Chester Area SD Board Marple Newtown SD	029 Fauli Fike	West Chester	FA	19360	knash@mnsd.org
	Sean Hackett	Conrad Weiser SD					s_hackett@conradweiser.org
337	Karen G. Cummings	Marple Newtown SD					kcummings@mnsd.org
	Terry Cook	Ford City Jr/Sr HS					CooT@asd.k12.pa.us
	Karlene Gutierrez Blair Hyatt	PPC	3700 Vartan Way	Harrisburg	ДΛ	17110	gutk@asd.k12.pa.us blair@paheadstart.org
	Wendi Folk	Avon Grove SD Board	375 S. Jennersville Road	West Grove	PA	19390	biaii@parieadstart.org
	Janet M. Schroeder	Upper Adams SD Board	P.O. Box 847	Biglerville		17307	
	Jack Norris	Quaker Valley SD Board	203 Graham St	Sewickley		15143	
	Moira Singer	W. H. W. L. G. J. O.	215 Briar Hill Court	Wexford			moirasinger@zoominternet.net
	Brian M. Small James A. Budzilek	Northern York County SD Leechburg Area SD	149 South Baltimore St 210 Penn Ave	Dillsburg Leechburg	PA	17019 15656	
	Cathy Smyth	Leediburg Area SD	2 to Fellit Ave	reecibalg		15050	otsmyth@mac.com
	Fred Baca						senorbaca@embarqmail.com
349	Kelly Pettier		1220 Waterford Rd	West Chester	PΑ	19380	kelpel1220@verizon.net
	Jean Brenner						jeanbrenner@yahoot.com
	Kimberly Buch Laura Brenner-Scotti		91 Holyoke Road	Richboro	PA	1805/	kbfem28@aol.com laurabrennerscotti@yahoo.com
	Jean Leiboff		50 Mann Street	Mansfield	PA		Jeanl.34@ptd.net
	Lynne Thompson						elynnet@comcast.net
	Diane Hartsough						DRHartsough@aol.com
	Wilbur E.Wolf, Jr.		833 Mount Rock Rd	Carlisle	PA	17015	wewjr@embarqmail.com
	Diann Metal William F. Brenner		312 Nathaniel Rd	Holland	DΔ	18966	dmetal@pinerichland.org billbrenner55@yahoo.com
	Cheryl Barnes		1401 Comflower Ln	Bensalem	PA		cab1002@comcast.net
	Randall Holt	Tredyffrin-Easttown resident					randy1holt@gmail.com
	Pamula A. Lenz	Springfield Elementary Schl					plenz@nwsd.org
	Francis D. Burke, Jr. Kim DeStefano	Tredyffrin-Easttown resident Tredyffrin-Easttown resident					jrburke@1934group.com
	Allison W. Cutler	Tredyffrin-Easttown resident					kim@allsewnuphome.com awc56@verizon.net
	Anna Sabol	Northwestern SD					Asabol@nwsd.org
	Mary Farence			Falls Township			liamslandscaping@msn.com
	Rebecca Schwindeman	PPC	479 Jenny Drive	Yardley			zschwin100@comcast.net
	Patricia Ciarlone Nadia Prisuta	Sharpsville Area HS	1212 Comerstone Blvd	Downingtown Hermitage	PA PA	19333	ciarlone@comcast.net nprisuta@hotmail.com
	Jean Twardzik	Pine Grove Area HS		, ioimage	,,,		jtwardzik@pgasd.com
371	Minne Porter	West Chester Area SD					mpporter@wcasd.k12.pa.us
	Katherine Keirsey	West Chester Area SD					kkeirsey@wcasd.k12.pa.us
	Morrice & Jennifer Taylor Crystal Johnson Goree	West Chester Area SD					jrt.family5@gmail.com cjohnson@wcasd.k12.pa.us
	Mary Ann Ohlert	West Chester Area SD					mohlert@wcasd.k12.pa.us
376	Michael F. Dunn, Jr.	West Chester Area SD	400 Montgomery Ave	West Chester	PΑ	19380	mfdun@wcasd.k12.pa.us
	Erin Shine	Tredyffrin-Easttown resident					mandeshine@comcast.net
	Franics Ryan						fryan@kcsd.org
	Rosemary Valasek Lori Dunkle						rav@asd.k12.pa.us dunkle@bedford.k12.pa.us
	Manuel Alfonso	PPC	2570 Willow Stream Drive	Quakertown	PA	18951	aifonma@localnet.com
	William Kinney		"-"				kinneyW@pasd.k12.pa.us
	Sue Leimbach	West Chester Area SD	829 Paoli Pike	West Chester Bethal Park			sleimbach@wcasd.k12.pa.us Clmbriale@psea.org
	Colleen Imbriale Janet Wolfe	PSEA Owen J. Roberts HS	5511 Main Street	Pottstown	PA PA	10102	jwolff@ojrsd.com
	Ruth Anne Bryant						bunrab@hotmail.com
387	Diane & Stuart Laderman	Tredyffrin-Easttown resident					ladermom@comcast.net
	Ron Phillips	Kennett HS		Kennett Square	PΑ		rphillips@kcsd.org
	Amy Gallageher Tracy Pine	Marple Newtown SD					agallagher@mnsd.org tracy.miller32@verizon.net
	Cecile Matthews	Marple Newtown SD	•				cmatthews@mnsd.org
	Vicki Embiscuso	Great Valley SD					Vernbiscuso@gvsd.org
	Jeffery Kuciapinski	Marple Newtown SD	500 B	NA4	_		jkuciapinski@mnsd.org
	Kathy Neary	Daniel Bases Assa CD	538 Beaumont Circle				kmneary@aol.com
	David H. Robbins Linda Bishop	Daniel Boone Area SD North Allegheny SD Board	321 N. Furnace St 200 Hillvue Ln	Birdsboro Pittsburgh	PA PA	19508 15237	
	3 2008				٠,٠	.5201	
397	Helena Miller		423 N. Olive St	Media			homiller@verizon.net
	Bettie Wright	Perkiomen Valley HS		Collegeville	PΑ	19426	bwright@pvsd.org
	Lia van Rijswijk-Sellers	•					SellersLia@aol.com
	Tracy Balsone Daniel R. Trimmer	Conewago Valley SD	130 Berlin Road	New Oxford	РΔ	17350	balt@asd.k12.pa.us
	Pat Wood	J		•///			phwood2@juno.com
403	Berry Ferguson	South Lebanon Elem Schl			•		bferguson@clsd.k12.pa.us
	Carolyn Viens	Unionville Chadds Ford SD					carolynviens@hotmail.com
	Sandra Sweeney						ssweeney@pvsd.org
	Jim Sankey Rebecca Wills	Tredyffrin-Easttown resident					jsankey@mercer.k12.pa.us WillsR@tesd.net
	Linda Banks	West Chester SD					lbanks@wcasd.k12.pa.us
	Karen Brubaker	Chichester MS					kbrubake@chichestersd.org
410	Kurt Eisele	Northeastern IU South Buffalo Elem					eiselekw@neiu.org negley@freeport.k12.pa.us
	LeeAnn Negley						

412	Beth Baker						bbaker@mnsd.org
	Larry Separd	Freeport Area SD					shepard@freeport.k12.pa.us
	Lisa Lamorgese	DOCA					sibeachbum@verizon.net
	Stephen E Bond Mary Janine Chiles	PSEA Tredyffrin-Easttown resident					sbond@wcasd.k12.pa.us mjchiles@comcast.net
	Timothy F. McNamee	Mohawk Area SD Board	P.O. Box 25	Bessemer	PA	16112	jor.iii.os@oo.iiiot
	Karen Suzadail	Owen J. Roberts HS					ksuzadail@ojrsd.com
	Lynne Henry	Phoenixville Area SD					henryl@pasd.k12.pa.us
	Jill Brown Molly Stewart	West Chester Area SD					jbrownshay@wcasd.k12.pa.us mollys@comcast.net
	John Stickley	Great Valley SD					jstickley@gvsd.org
	Dave Schlosser						schlosscat@aim.com
	Mandy Learson	Great Valley SD					mlearson@gvsd.org
	Peter Chamberlain Linda Walker	Conrad Weiser SD Armstrong SD					p_chamberlain@conradweiser.org wall@asd.k12.pa.us
	Theresa Saunders	Marple Newtown SD					tsaunders@mnsd.org
	Janet Miller	Chichester SD					jmiller@chichestersd.org
	Merrill Fennell	Cintage and LIC		1 (44)4	Π.		merrillfennell@hotmail.com
	Bryant Meckley Sharon DeStefano	Littlestown HS		Littlestown	PA		meckleyb@lasd.k12.pa.us shardestef@msn.com
	Carolyn Smith	Armstrong SD					smica@asd.k12.pa.us
	Bonnie McCloskey	Avon Grove SD					bmccloskey@avongrove.org
	Christian & Analisa Sondergaard	Tredyffrin-Easttown resident					chris-analisa@verizon.net
	Elaine Kennedy Doug Meckley	PSEA					buzkennedy@embarqmail.com dougmeckley@comcast.net
	Diane Ishman-Hunker	Hanover SD		Hanover	PΑ		dmishman@comcast.net
	Joan Duvall-Flynn	PA State Conf of NAACP					jed.flynn@verizon.net
	Lori & Rocco Piccone	Tredyffrin-Easttown resident	132 Fox Valley Lane	Glen Mills	-		Ipiccone@verizon.net
	Joan Duvall-Flynn Julie Samuels	NAACP Marple Newtown SD	3530 Goshen Road				jed.flynn@verizon.net isamuels@mnsd.org
	Mercedes Taylor	Marpie Hentown Co	oodo Obsileii Noda	Pittsburgh			mercedescharmain@aol.com
	Heather Berra	Central Dauphin East HS	626 Rutherford Road				hberra75@hotmail.com
	Margaret Smith	Owen J. Roberts HS	831 Rivendell Lane	Pottstown	PA		msmith@ojrsd.com bscanlon@pasdedu.org
	Beth Scanlon Jessica E. Pragada	Tredyffrin-Easttown resident					pragada@comcast.net
	Ruth Gail Cohen	Marple Newtown SD					rcohen@mnsd.org
	Kim Foxhall	Pine-Richland SD					kafoxhall@zoominternet.net
	Melissa Field Carolyn Carver	PPC					newdoors88@msn.com vze2gxsp@verizon.net
	Tracey deCerchio	FFC					md2it@comcast.net
	Fred Krause						theadamscounty@embarqmail.com
	Cathy Vaccaro						cathyv19013@yahoo.com
	Scott Whittington	Tradiffic Continue resident	14 Martins Lane	Danisin	Π.		swhitt1158@comcast.net
	Craig H. Peterson Karen A. Peterson	Tredyffrin-Easttown resident Tredyffrin-Easttown resident	14 Martins Lane			19132 19132	
	Ellwood F. Jones	Colonial SD					lowergwyneddgop@aol.com
	Ruth Hoover Seitz		660 Boas St. Apt 1814	Harrisburg	PΑ		ruth.seitz@yahoo.com
	Mark Amold Kathy O'Neal-Sloane						theamoids1@verizon.net onealsloane@gmail.com
	Candace Sparks	Cumberland Valley SD					sparkyc23@yahoo.com
	Bryan Sanguinito	Reading SD					sang@dejazzd.com
	Deborah Goodman	Mount Union Area SD	154 School Street	Mount Union	PΑ	17066	dgoodman@muasd.org
	5 2008 Pertina Price						FabFam23@aol.com
	Paula Tagliaferro						ptagliaferro@yahoo.com
	Shane & Scott Morgan						thegivinggarden@mac.com
	Wendy Compernoile	Pine-Richland SD	3746 Legion Drive	Gibsonia	PA		wendyc@connecttime.net
	Brian Kocur Colleen Cook	Pine-Richland SD					ekocur@hotmail.com colcenk@nauticom.net
	Carol Dishart	Pine-Richland SD					cdishart@nauticom.net
	Lori Colella	Pine-Richland SD					lacolella36@yahoo.com
	Mark Colella	Pine-Richland SD					raddoc5@yahoo.com
	Michele Campeau Mike Bravis	PPC	126 Fifth Ave	Latrobe	PA		campeauml3@upmc.edu mbravis@verizon.net
- ::	Nicole McCormick		120111017110	244020			McComickN@PASD.K12.PA.US
	Jennifer Shade						jennifer_shade@iu13.org
	Elizabeth Whitehead David Johnston	PSEA NAACP	207 Warwick Street 322 N. 2nd Street #1204		PA PA		ewhitehe@basd.net blackecho47@netzero.com
	Lia Talmas	PSEA	100 W Aaron Dr. Apt G6				Italmas@basd.net
	Randy Reed	PSEA	162 Mountain Drive				rjr@sssd.k12.pa.us
	Karen Dionise						dionise@zoominternet.net
	Susan Sitarchuk Desiree Packer	Tredyffrin-Easttown resident PSEA	PO Box 502	Blanchard	D۵		Ssitarchuk@aol.com dlpacker@hotmail.com
	Robin White	NAACP	. 5 500 502	Janonard			Rwhite@SCAVTS.net
485	Laurie Greer						laurie_greer@IU13.org
	Marie Hoffman	PPC	404 M/-!! 5 :	101			mhoffman@havsd.net
	Lisa Plant Felix J. Yerace	Pine-Richland SD South Fayette Twp HS Student Government	461 Wallace Rd 3640 Old Oakdale Road	Wexford McDonald		15090 15057	lplant2003@yahoo.com
	Charles E. Madden III	Radnor Twp SD Board	130 South Wayne Ave			19087	
490	Richard Noe		•				yawnboyfilms@mac.com
	Catherine Ferreri	Tredyffrin-Easttown resident	518 Northfield Road	Devon	PΑ		kay_ferreri@msn.com
	Diann Corll Kim Yackovich	Pine-Richland SD Pine-Richland SD		Gibsonia	PΔ		corlld@upmc.edu kimyack@nauticom.net
	Margaret Kerr	Great Valley SD		Cibotila			Mkerr@gvsd.org
	Jeff & Rusti Null	Pine-Richland SD					thenulls@zoominternet.net
	Dee Corcoran	Chester County IU	220 Carrel Sall Co	Class -	_		DeeC@cciu.org
	Rosemary Grill Charu Gandhi	PSEA Tredyffrin-Easttown resident	230 South Mill Street	Cleona	PA	17042	prgrill@comcast.net charu418@verizon.net
	Amit Prasad	Trodymir Edotom rooldon					amitprasad@hotmail.com
500	Clarke & Annette McGuire	Pine-Richland SD	505 Salem Heights Dr	Gibsonia			zaam04@nauticom.net
	Amy Wall	Charter County III	1125 Colonial Road	Lancaster	PA	17603	amy.wall@pennmanor.net
	Kathy Lozier Elizabeth Castleman	Chester County IU Tredyffrin-Easttown resident		4			KathyL@cciu.org epcastelman2@earthlink.net
	Denise Dyni	Pine-Richland SD	305 Tiffany Court	Gibsonia	PA	15044	denisedelo@zoominternet.net
505	Karen Coulter		-				COUK@asd.k12.pa.us
	Nancy L Tolfa & J Todd Aukerman	Mount Union Area SD		Mount Hains	PA		n85tolfa@connecttime.net
	Curtis Whitesel Kevin Nigh	Mount Union Area SD Pine-Richland SD	523 Salem Heights Drive	Mount Union Gibsonia		15044	cwhitesel@muasd.org nighs@nauticom.net
	Jaime Reilly	Marple Newtown SD	3530 Goshen Road	Newtown Squar			jreilly@mnsd.org
510	Holli Strange	Pine-Richland SD					strange@nauticom.net
	Anne Butler Ferguson Bert Sciulli & Anne Marie Ficco	Freeport Area SD		Freeport	PA		ferguson@freeport.k12.pa.us Aficco@aol.com
	Wythe Keever	PSEA	2212 Gorse Drive	Harrisburg	PA	17110	wkeever@comcast.net
514	Jolene Lowry	Pine-Richland SD	501 Blueberry Trail	Mars	PΑ	16046	jolow@zoominternet.net
515	Walter R. Zurasky		116 Colonial Village Drive	Pittsburgh	PΑ	15235	

516	Ylvonne Gonzalez	NAACP					ylvonne@rexachsalley.com
	Barbara Levitt	South Fayette Twp SD					levitt@southfayette.org
	Debbie Neatock	Center for Arts & Tech	1580 Charlestown Road	Phoenixville			DebbieNe@cciu.org
	Mark & Laura Ohlund	Pine-Richland SD	414 Lenox Court	Gibsonia	PΑ	15044	laura@woodwrecker.com
	Gary McGree	0					MCGEEG@fmsd.k12.pa.us
	Lisa Britton Colleen Innerst	Garnet Valley SD					brittol@gametvalleyschools.com cinnerst@pa.net
	Judy Saunders						judysaunders2@yahoo.com
	Joann Sirera	•		Wexford	PΑ	15090	jsirera@nauticom.com
	Paul Billman	Tredyffrin-Easttown resident		VVEXIOIG		10000	paebillman@comcast.net
	Donna Gillespie	Pine-Richland SD	3727 Bakerstown Road	Gibsonia	PA	15044	Gillespie@mrs.org
	Kimberly Zynn	Pine-Richland SD		Wexford			kzynn@acuityprofessionals.com
	Betsy Fadem	Tredyffrin-Easttown resident					FADEMB@aol.com
	Megan T. Robinson	Tredyffrin-Easttown resident					robinsonme@email.chop.edu
	Bob Griffin	PPC	328 Welcome House Road	Perkasie	PA	18944	bhb@cybernex.net
531	Ronald R. Sofo	Beaver County SDs (10)					sdisante@freedom.k12.pa.us
532	Tema Tiller	PPC	610 Marydell Drive	East Goshen		19380	
533	William & Linda Boston	PPC	566 Foy Drive	Furlong		18925	
534	Catherine A. Chris	Power Conversion Technologies	152 Nickle Road	Harmony	PΑ	16037	
	Susan P. Hampel	Tredyffrin-Easttown resident					sphampel1@msn.com
	Peg Makela	Marple Newtown SD	2201 Sproul Road	Broomall	PΑ		pmakela@mnsd.org
	Harry W. Morgan	Boyertown Area SD Board	911 Montgomery Ave	Boyertown		19512	
	K. Scott Long	Muhlenberg SD Board	801 Bellevue Ave	Laureldale		19605	
	Robert M. Gumbita	Mount Pleasant Area SD Board	RD 4 Box 2222	Mount Pleasant			
	Robert M. Kyl	Southern Huntingdon County SD Board	RR 2 Box 1124	Three Springs	PA	17204	
	9 2008 Frank Aufiero		400 Berwyn Park Ste 115	Berwyn	DΔ	10312	Fauriero@carrowdoyle.com
	Michele Burger	Tredyffrin-Easttown resident	400 Belwyll Park Ste 115	Derwyn	-	10012	mburgerpto@comcast.net
	Patti Bailey	Tredyffrin-Easttown resident					baileyps@aol.com
	Catherine Barrios	Tredyffrin-Easttown resident					thebarriosfamily@comcast.net
	Patellen Corr	Tredyffrin-Easttown resident					patellencorr@comcast.net
	Eric Miller	Conewago Valley SD					emiller53@comcast.net
547	Patty Sullivan	West Chester Area SD					pashome1@verizon.net
548	Rita M. Gosnear	Tredyffrin-Easttown resident					gosnearfam@comcast.net
549	John and Laura Backe	Tredyffrin-Easttown resident					lbacke@comcast.net
550	Marilyn Gundy						gundy95@yahoo.com
551	Juliette Hyson	Tredyffrin-Easttown resident	1559 Russell Road	Paoli			hyson@att.net
	Cynthia L. Templin	PSEA	173 Riders Way	Lebanon			greenleafstudios@verizon.net
	Jennifer Agolino	PSEA	27 Sturmer Street	Exeter			iin2home@yahoo.com
	Jami Smith	PSEA	1241 Edith Drive				ils115@pitt.edu
	Al Bobinas	PSEA	243 North Street	Minersville	PA	17954	bobinas@go.com
	Steve and Heidi McMurray	Tredyffrin-Easttown resident	440 483 - 03	D		45447	heidimc@zoominternet.net
	Paul Cech	PSEA	116 Alkim Drive	Brownsville	PA	15417	
	Patricia McElderry	Tredyffrin-Easttown resident					trishmike@aol.com
	Colleen Johnson Kristen Ressler	Tredyffrin-Easttown resident Tredyffrin-Easttown resident					johnson93@verizon.net kristenressler@yahoo.com
	Tom Beccone	Downingtown Area SD	103 Willow Glade Ct.	Exton	PA ·		tbeccone@excite.com
	Ron Ebbert	Upper Adams SD Board	105 VIIION Clade Of.	EXION	1 /		ron_ebbert@hotmail.com
	Laurel Taylor	West Chester HS					laurel.anne.taylor@gmail.com
	Barbara Rathbone-Frank	11000 01100001 110					binmf@verizon.net
	Jane Wagner	Mount Union Area SD					ilwagner@verizon.net
	Kevin J. McCarty	Jefferson-Morgan Sd	PO Box 697	Fredericktown	PΑ	15333	kjmgkm@alltel.net
567	Beth Walsh						bethandtom1again@verizon.net
568	Mary K. Baden						mkbaden@nauticom.net
569	Veronica Herzog	PSEA	603 Crescent Drive	Glenolden	PΑ	19036	viherz@comcast.net
	Zoi McCormick						htmazoi@verizon.net
	Lori MCFarland	PSEA	1709 33rd St	Allentown			mcfarlandlori@msn.com
	Michael J. Sabal		4943 Oxford Court	Bensalem	PΑ	19020	m_sabal@yahoo.com
	Elaine Bomkamp						Bomkamp@havsd.net
	Brenda Gorman	PSEA	PO Box 864	Lemont	PA	16851	bkg4@yahoo.com
							duns5@zoominternet.net
	Rick and Lilly Dunsmore	Dina Diabland CD					
	Debbie Stevens	Pine-Richland SD					4tots4me@connecttime.net
	Debbie Stevens Barbara Ritzheimer						ritzh5000@comcast.net
578	Debbie Stevens Barbara Ritzheimer Marianne Neel	West Jefferson Hills SD	PO Roy 697	Fredericktown	DΔ		ritzh5000@comcast.net mlneel@verizon.net
578 579	Debbie Stevens Barbara Ritzheimer Marianne Neel William Beck	West Jefferson Hills SD Jefferson-Morgan Sd	PO Box 697			15333	ritzh5000@comcast.net mlneel@verizon.net williambeck@alltel.net
578 579 580	Debbie Stevens Barbara Ritzheimer Marianne Neel William Beck Paul R. Stepanoff	West Jefferson Hills SD Jefferson-Morgan Sd PPC	PO Box 697 2301 Computer Ave.	Willow Grove	PA	15333 19090	ritzh5000@comcast.net mlneel@verizon.net williambeck@alltel.net Psepanoff@efgroup.com
578 579 580 581	Debbie Stevens Barbara Ritzheimer Marianne Neel William Beck Paul R. Stepanoff Carol Forbes	West Jefferson Hills SD Jefferson-Morgan Sd			PA	15333 19090 17331	ritzh5000@comcast.net mlneel@verizon.net williambeck@alltel.net Psepanoff@efgroup.com CounLib@aol.com
578 579 580 581 582	Debbie Stevens Barbara Ritzheimer Marianne Neel William Beck Paul R. Stepanoff	West Jefferson Hills SD Jefferson-Morgan Sd PPC		Willow Grove	PA	15333 19090 17331	ritzh5000@comcast.net mlneel@verizon.net williambeck@alltel.net Psepanoff@efgroup.com
578 579 580 581 582 583	Debbie Stevens Barbara Ritzheimer Marianne Neel William Beck Paul R. Stepanoff Carol Forbes Howard Arensberg	West Jefferson Hills SD Jefferson-Morgan Sd PPC		Willow Grove	PA PA	15333 19090 17331	ritzh5000@comcast.net mineei@verizon.net williambeck@alltel.net Psepanoff@efgroup.com CounLib@aol.com leshow13@hotmail.com
578 579 580 581 582 583 584 585	Debbie Stevens Barbara Ritzheimer Marianne Neel William Beck Paul R. Stepanoff Carol Forbes Howard Arensberg Deanna Moximchalk Debbie Bent James G. Routh	West Jefferson Hills SD Jefferson-Morgan Sd PPC Hanover SD Highlands SD Board Jamestown Area SD Board	2301 Computer Ave. PO Box 288 PO Box 216	Willow Grove Hanover Natrona Height: Jamestown	PA PA PA	15333 19090 17331 15065 16134	ritzh5000@.comcast.net mineei@verizon.net williambeck@.alltei.net Psepanoff@efgroup.com CounLib@aol.com leshow13@hotmail.com deemox@msn.com
578 579 580 581 582 583 584 585	Debbie Stevens Barbara Ritzheimer Marianne Neel William Beck Paul R. Stepanoff Carol Forbes Howard Arensberg Deanna Moximchalk Debbie Bent	West Jefferson Hills SD Jefferson-Morgan Sd PPC Hanover SD Highlands SD Board Jamestown Area SD Board Penncrest SD Board	2301 Computer Ave. PO Box 288 PO Box 216 18741 State Hwy 198	Willow Grove Hanover Natrona Height: Jamestown Saegertown	PA PA PA PA PA	15333 19090 17331 15065 16134 16433	nitzh5000@comcast.net mlneei@verizon.net williambeck@alltel.net Psepanoff@efgroup.com CounLib@aol.com leshow13@hotmail.com deemox@msn.com
578 579 580 581 582 583 584 585 586 587	Debbie Stevens Barbara Ritzheimer Marianne Neel William Beck Paul R. Stepanoff Carol Forbes Howard Arensberg Deanna Moximchalk Debbie Bent James G. Routh Cynthia A. Snyder Katherine Pettiss	West Jefferson Hills SD Jefferson-Morgan Sd PPC Hanover SD Highlands SD Board Jamestown Area SD Board Penncrest SD Board Great Valley SD	2301 Computer Ave. PO Box 288 PO Box 216 18741 State Hwy 198 3 Almy Drive	Willow Grove Hanover Natrona Height: Jamestown Saegertown Malvem	PA PA PA PA PA PA	15333 19090 17331 15065 16134 16433 19355	nitzh5000@comcast.net mlneei@verizon.net williambeck@alltel.net Psepanoff@efgroup.com CounLib@aol.com leshow13@hotmail.com deemox@msn.com
578 579 580 581 582 583 584 585 586 587	Debbie Stevens Barbara Ritzheimer Marianne Neel William Beck Paul R. Stepanoff Carol Forbes Howard Arensberg Deanna Moximchalk Debbie Bent James G. Routh Cynthia A. Snyder Katherine Pettiss N. Robert Laws	West Jefferson Hills SD Jefferson-Morgan Sd PPC Hanover SD Highlands SD Board Jamestown Area SD Board Penncrest SD Board Great Valley SD Central Bucks SD	2301 Computer Ave. PO Box 288 PO Box 216 18741 State Hwy 198 3 Almy Drive 20 Weiden Drive	Willow Grove Hanover Natrona Height: Jamestown Saegertown Malvem Doylestown	PA PA PA PA PA PA	15333 19090 17331 15065 16134 16433 19355 18901	nitzh5000@comcast.net mlneei@verizon.net williambeck@alltel.net Psepanoff@efgroup.com CounLib@aol.com leshow13@hotmail.com deemox@msn.com
578 579 580 581 582 583 584 585 586 587 588	Debbie Stevens Barbara Ritzheimer Marianne Neel William Beck Paul R. Stepanoff Carol Forbes Howard Arensberg Deanna Moximchalk Debbie Bent James G. Routh Cynthia A. Snyder Katherine Pettiss	West Jefferson Hills SD Jefferson-Morgan Sd PPC Hanover SD Highlands SD Board Jamestown Area SD Board Penncrest SD Board Great Valley SD Central Bucks SD Elk Lake SD Board	2301 Computer Ave. PO Box 288 PO Box 216 18741 State Hwy 198 3 Almy Drive 20 Welden Drive PO Box 100	Willow Grove Hanover Natrona Height: Jamestown Saegertown Malvem Doylestown Dimock	PA PA PA PA PA PA PA	15333 19090 17331 15065 16134 16433 19355 18901 18816	nitzh5000@comcast.net mineei@verizon.net williambeck@alltei.net Psepanoff@efgroup.com CounLib@aol.com leshow13@hotmail.com deemox@msn.com
578 579 580 581 582 583 584 585 586 587 588 589 590	Debbie Stevens Barbara Ritzheimer Marianne Neel William Beck Paul R. Stepanoff Carol Forbes Howard Arensberg Deanna Moximchalk Debbie Bent James G. Routh Cynthia A. Snyder Katherine Pettiss N. Robert Laws Charles Place	West Jefferson Hills SD Jefferson-Morgan Sd PPC Hanover SD Highlands SD Board Jamestown Area SD Board Penncrest SD Board Great Valley SD Central Bucks SD Elik Lake SD Board Susquehanna Cty CTC	2301 Computer Ave. PO Box 288 PO Box 216 18741 State Hwy 198 3 Almy Drive 20 Welden Drive PO Box 100 PO Box 100	Willow Grove Hanover Natrona Height: Jamestown Saegertown Malvem Doylestown Dimock Dimock	PA PA PA PA PA PA PA PA	15333 19090 17331 15065 16134 16433 19355 18901 18816 18816	ritzh5000@comcast.net mlneei@verizon.net williambeck@alltel.net Psepanoff@efgroup.com CounLib@aol.com leshow13@hotmail.com deemox@msn.com
578 579 580 581 582 583 584 585 586 587 588 589 590 591	Debbie Stevens Barbara Ritzheimer Marianne Neel William Beck Paul R. Stepanoff Carol Forbes Howard Arensberg Deanna Moximchalk Debbie Bent James G. Routh Cynthia A. Snyder Katherine Petitiss N. Robert Laws Charles Place	West Jefferson Hills SD Jefferson-Morgan Sd PPC Hanover SD Highlands SD Board Jamestown Area SD Board Penncrest SD Board Great Valley SD Central Bucks SD Elk Lake SD Board SP&R SUSQUEATION CTC SP&R	2301 Computer Ave. PO Box 288 PO Box 216 18741 State Hwy 198 3 Almy Drive 20 Welden Drive PO Box 100	Willow Grove Hanover Natrona Height: Jamestown Saegertown Malvem Doylestown Dimock Dimock	PA PA PA PA PA PA PA PA	15333 19090 17331 15065 16134 16433 19355 18901 18816 18816	ritzh500@comcast.net mineei@verizon.net williambeck@alltei.net Psepanoff@efgroup.com CounLib@aol.com leshow13@hotmail.com deemox@msn.com
578 579 580 581 582 583 584 585 586 587 588 589 590 591	Debbie Stevens Barbara Ritzheimer Marianne Neel William Beck Paul R. Stepanoff Carol Forbes Howard Arensberg Deanna Moximchalk Debbie Bent James G. Routh Cynthia A. Snyder Katherine Pettiss N. Robert Laws Charles Place Jim Lee Paul DiLorenzo	West Jefferson Hills SD Jefferson-Morgan Sd PPC Hanover SD Highlands SD Board Jamestown Area SD Board Penncrest SD Board Great Valley SD Central Bucks SD Elk Lake SD Board Susquehanna Cty CTC SP&R PPC	2301 Computer Ave. PO Box 288 PO Box 216 18741 State Hwy 198 3 Almy Drive 20 Welden Drive PO Box 100 PO Box 100	Willow Grove Hanover Natrona Height: Jamestown Saegertown Malvem Doylestown Dimock Dimock	PA PA PA PA PA PA PA PA	15333 19090 17331 15065 16134 16433 19355 18901 18816 18816	ritzh500@comcast.net mlneei@verizon.net williambeck@alltei.net Psepanoff@efgroup.com CounLib@aol.com leshow13@hotmail.com deemox@msn.com
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578 579 580 581 582 583 584 585 586 587 592 593 594 595 596 601 602 603 604 605 606 607 616 616 616 616 617	Debbie Stevens Barbara Ritzheimer Marianne Neel William Beck Paul R. Stepanoff Carol Forbes Howard Arensberg Deanna Moximchalk Debbie Bent James G. Routh Cynthia A. Snyder Katherine Pettiss N. Robert Laws Charles Place Jim Lee Paul DiLorenzo Michele O'Brien Rose Cavalieri Mary Miller Linda A. Schmoyer Lawrence C. Korchnak Margaret & William Morgart Hannah Hepbum 11 2008 Barbara Jean Gantwarg Lamia P. Barakat Kristen Doran Karen E. Jez Amelia Berberich Jeanne Hinton Bradley C. Norford David Hutchinson Sharon Sweitzer Maria Beinar Uliday Beinar Uliday Beinard Miller Joanne Hinton Bradley C. Norford David Hutchinson Sharon Sweitzer Maria Smith Douglas N. Frenkel Brian Chilcote Sue Holliday	West Jefferson Hills SD Jefferson-Morgan Sd PPC Hanover SD Highlands SD Board Jamestown Area SD Board Penncrest SD Board Great Valley SD Central Bucks SD Elk Lake SD Board Susquehanna Cty CTC SP&R PPC Tredyffrin-Easttown resident PSEA PSEA PSEA PSEA PSEA PSEA PSEA PSEA	2301 Computer Ave. PO Box 288 PO Box 216 18741 State Hwy 198 3 Almy Drive PO Box 100 PO Box 100 604 N. Third St. 335 Sweetbriar Road 1785 Woodridge Ct 2805 W. Crossing Circle 4900 Curry Road 555 Berwyn Baptist Rd 221 North Washington St 1730 Walnut Street 14 S. Bryn Mawr Ave ste 208 PO Box 250 3400 Chestnut Street 643 Saint Paul Road	Willow Grove Hanover Natrona Height: Jamestown Saegertown Malvern Doylestown Dimock Dimock Harrisburg King of Prussia Lebanon Norristown Pittsburgh Devon Pittsburgh Erdenheim Titusville Media Bryn Mawr State Cotlege Drums Philadelphia Meyersdale	PAA PAAAAA PAAAAA PAA PAA PAA PAA	15333 19090 17331 15065 16134 16433 19355 18901 17010 19406 17046 19403 15236 19333 16354 19063 19010	rizh500@comcast.net mineei@verizon.net williambeck@alltel.net Psepanoff@efgroup.com CounLib@aol.com leshow13@hotmail.com deemox@msn.com iames@susquehannapolling.com paul.dilorenzo@venzon.net micob5@comcast.net atticav@hotmail.com memiller@lmf.net lschmo@aol.com lkorchnak@wschools.net margi@morgart.com h.hepbum@ecarecruiters.com bfantward1@pghboe.net lpb22@drexel.edu kristendoran@comcast.net micke@gorockets.org aberberich@wcasd.k12.pa.us 425swope@comcast.net mmiller@psea.org isemmer@comcast.net maijsh@verizon.net bmiller@psea.org isemmer@comcast.net maijsh@verizon.net mijp11@scasd.org kenionaii@bee.net marias@hsweb.org dfrenkel@law.upenn.edu brianchilcote@yahoo.com blilidav@gcnetmail.net

		1				1	
619	Tina Clark	PPC	125 E. Upsal Street	Philadelphia	PA	19119`	tiwiclark@verizon.net
	Monica Miller	PPC	PO Box 233				mountainviewmath@yahoo.com
	Cheryl Rometo-Gartley	PPC	316 4th Ave	New Kensingtor	PΑ		crgartley@hotmail.com
	Selene Tyrreil	Tredyffrin-Easttown resident					selenetyrreli@verizon.net
	Kym Guy	PPC	PO Box 28847				kym6619@aol.com
	Marcy Bacine	PPC	7102 McCallum St				mbacine@mac.com
	Lee Saunders Steven Tracy	PPC Dallastown Area SD	306 Center Grange Rd	Monaca	FA		Isaunders@aliquippa.k12.pa.us Steven.Tracy@dallastown.net
	Alan Holtzer	Tredyffrin-Easttown resident					aholtzer@msn.com
	Laurie M. Rossiello	Garnet Valley SD					rossiel@garnetvalleyschools.com
	Majorie Smith	,	46 Fairview Ave	Hatboro	PA		marg9977@yahoo.com
	Karen Guglielmo	PSEA	202 Rebecca Ln	Coatesville	PA	19320	kguglielmo2002@verizon.net
631	Helen & Anthony Castrucci	West Chester SD	1405 E. Woodbank Way	West Chester	pa		hcastrucci@comcast.net
	Jeri Myers	Dallastown Area SD					Jeri.Myers@dallastown.net
	Orianna Poruban	PPC	340 Main Street				orianalee 2000@yahoo.com
	Judy Pittenger	PPC PPC	480 Harvest Drive 85 Lambeth Dr				ipittinger@familyfirsthealth.org t_henderson@bgcwpa.oorg
	Terri Henderson Lin Bennett	PPC	729 W. Luzerne St				Irbee@msn.com
	Rachel VanDer Bas	PPC	21 Croft Drive				cybertykes ry@verizon.net
	Susan Brown		2. 3.3				siouxbrown@comcast.net
639	Bernice Ralph						bemiceralph@zitomedia.net
640	Mary Ann Burick	PPC	202 15th St	Bessemer	PA		mjburick@netzero.com
	Dave Pascale	FirstEnergy Service Co	122				dpascale@firstenergycorp.com
	Rimma Shvartsman	PPC	367 Basswood Circle				Rshvart@yahoo.com
	Christine R. Staats	Dallastown Area SD	700 New School Ln	Dallastown	PA		Christine Staats@dallastown.net
	Mindy Gusdorff A. Pennington	Tredyffrin-Easttown resident					amgusdorff@verizon.net cahlp@comcast.net
	G. Lombardi						dgdm@comcast.net
	Glenn Unger	ARC of PA	575 Gouglersville Rd	Reading	PA		glenn.unger@berksproducts.com
	Mary Wesolek	PPC	628 Carl Ave	New Kensington			mwesolek55@hotmail.com
	Deborah Leggens	ARC of PA	316 Donohoe Rd			15601	dleggens@arcwestmoreland.org
	Chris Kilby	ARC of PA	396 Willow Rd				kilbyc@csgonline.org
	Kate Ritchie	ARC of PA	332 Aldan Ave				kate.ritchie@hotmail.com
	Diane Reisinger	ARC of PA	305 Timber Ridge Rd				dreisinger@state.pa.us
	Sue Kissinger	ARC of PA	11 Spruce Rd 879 Williams Place				catz_galore@embarqmail.com medonnelly@growthhorizons.org
	Mary Ellen Donnelly Charleen McGrath	ARC of PA ARC of PA	117 Ford Street				ctmcg@aol.com
	Lynn Kleinfelter	ANO OFF A	TITT OIG SUCCE	WCSt Constitution			LynnK@cciu.org
	Shirley Meyers	ARC of PA	3000 Lakewood Dr 4301	Hermitage	PA		smeyers@mercerarc.org
	Margaret Thomas	ARC of PA	8 Washington Ave				myt51@aol.com
	Nicole Jones	ARC of PA	459 Davis St			16146	njones@mercerarc.org
660	Debbie Fabio	ARC of PA	104 Persimmon Place	Cranberry Towr			debfabio@zoomintemet.net
	Cindy Duch	ARC of PA	3016 Greenridge Dr				cduch3016@aol.com
	Diane O'Rourke	ARC of PA	3277 Longview Rd	Hermitage	PA		dorourke@mercerarc.org
	Susan Burke	ADC -4 DA	DOE Mandrat Ct Ond St	Cumbum	ο,		BurkeSus@ssd.k12.pa.us
	Gail Leightley Michelle Smithman	ARC of PA ARC of PA	225 Market St 2nd flr 1580 Derry Drive				arcnorth@ptd.net michellesmithman@msn.com
	Donna F. Held	Owen J. Roberts HS	1360 Delly Dilve	Diesilei	-		dheld@oirsd.org
	Mark Frew	ARC of PA					mark.frew@atlanticbb.net
	Barbara Jumper	ARC of PA	2569 Walnut St	Harrisburg	PA		bjumper@arofdc.org
669	Barbara Blasucci	ARC of PA	225 Meadowbrook Ave				babsrunner@hotmail.com
	Michele Mailman	ARC of PA	837 Timber Lane				mgmailman@aol.com
	Steve Mailman	ARC of PA	837 Timber Lane				smailman@aol.com
	Donna Flood	ARC of PA					donna flood@vanguard.com
	Reid Wolfe Joe Butzer	ARC of PA ARC of PA	711 Bingham St 632 Copper Circle				rwolfe@achieva.info jbutzer@advantagentls.com
	Cynthia McCurdy	ARC of PA	434 S. Saddlebrook Cr	Chester Springs			clmccurdy@verizon.net
	Margie Cosgrove	ARC of PA	245 Canaan St				mcosgrove@tricountyhs.com
	Susan Kluge	ARC of PA	2289 Ave A				skluge@arcofl-n.org
678	Jill McIntosh	ARC of PA	629 Nelson Ave				jaemac@verizon.net
	Lisa Steals	ARC of PA	809 18th St				Isteals@comcast.net
	Janet Stasney	ARC of PA	2111 West Independence S	Coal Township	PA		staz@evenlink.com
	Patricia A. Connell	Tredyffrin-Easttown resident	400 Maria Avia	Cardhamatan	D.4		teeconn@aol.com skmlfc@verizon.net
	Shelley Kolber Migdalia Neely	ARC of PA	460 Maple Ave 12008 Maplewood Drive	Southampton East Stroudsbu			marmig@ptd.net
	Suzanne Parks	ARC of PA	424 Lockhart St				sparks@fcbanking.com
	Betsy Snyder	ARC of PA	2142 Reindeer Ct				betsysnder2@comcast.net
	Peter Garland	State System of Higher Education	2986 North Second St		PΑ	17110	
	Becky Espanol	ARC of PA	7705 Dungan Rd				bespanol@mhasp.org
	Jeff Bell	ARC of PA	197 Dunn Station Rd				jbell@greenarc.org
	Mrs. Deddy	ARC of PA ARC of PA	861 Sullivan Dr				deddyr@verizon.net tforiska@mdvl.net
	Diane Foriska Gail Morrison	Dallastown Area SD	22115 Daisy Ave	Meadville	FA		Gail Morrison@dallastown.net
	Joan Sechrist	ARC of PA	43 Walnut Ln	Lebanon	PA		mrsrat1@verizon.net
	Tracy Loi	ARC of PA	180 Greenlea Dr				tracylioi@hotmail.com
694	Teresa Koenigsberg						tkoenigsberg@comcast.net
	Estelle Kreutzer	ARC of PA	119 Broadbent Rd				gkreutzer@comcast.net
	M. Joseph Brady	Minersville Area SD Board	PO Box 787			17954	
	Linda Wagner	Hanna Baddaman CD Banad	1254 Laurytown Rd			18255 18073	
	Timothy F. Kirby Robert G. Schwartz	Upper Perkiomen SD Board Juvenile Law Center	2229 E. Buck Road 1315 Walnut St ste 400			19107	
	Karen Gatto	PPC	13 13 Walliat St ste 400	rimadelpina	-		karengatto@verizon.net
	Joan Kenney	ARC of PA	822 Harper Ave	Drexel Hill	PA		jmk822@comcast.net
	Mary Lou Pfau	PPC	400 E. Street Rd Apt 81				Mary2001Lou@yahoo.com
703	Pamela Seward	ARC of PA	402 Old 71	Charleroi	PA	15022	sojourner2005@comcast.net
704	Angela Stanton	ARC of PA	1709 Calamia Dr	Norristown	PA		lobo156@comcast.net
	Carol Brunner	100 (01	40001	Dharafa W	D.		cibrunne@aol.com
	Pamula Zahorchak	ARC of PA PPC	1002 Lori Lane 829 Hecla Rd	Phoenixville			c21pamz@msn.com skrallman@zoominternet.net
	Sherry Krallman Fran Jacobs	ARC of PA	51 Jeremiah Collett Rd				acobsmail@usa.net
	Dolores Bostak	ARC of PA	20 Country Farm Ln				dollyboss20@comcast.net
	Gary Cribbs						themgman@hotmail.com
	David Flaks	ARC of PA	7517 Vemon Rd	Melrose Park	PA	19027	davidflaks@aol.com
	William Burnett Jr	ARC of PA	622 Bath St				wbumett34@comcast.net
713	Tracy Thoman		=				ttx5@yahoo.com
	Diana Quinn	ARC of PA	4 Traverse Dr	Plymouth Meeti	PA	19462	deverquinn@comcast.net
	Sharon Gregorowicz						Sgregorowi@aol.com
	Kimberly Nussbaum						knussbaum@zoominternet.net dawson@zoominternet.net
	Theresa Dawson Lawrence W. Emark	ARC of PA	8684 West Barkhurst Dr	Pittsburgh	PΔ	15237	emarklw@verizon.net
	Lorraine Robertson	ARC of PA	715 South Matlack St				scorchm@aol.com
	Ayuko Siegel	Tredyffrin-Easttown resident					ayukos1@excite.com
	Mary Chandler	ARC of PA	228 Spring Road	Malvem			bchandler@aol.com
722	Marie Gaui	ARC of PA	1421 Meadowview Dr	Pottstown			the gauls@comcast.net
723	Elizabeth Andres Bell	Tredyffrin-Easttown resident					bethandresbell@verizon.net

724							
127	Sue Addis	Tredyffrin-Easttown resident					susanaddis@verizon.net
	Denise McDermott						paulandee@verizon.net
	Anne Couldridge	ARC of PA	900 N. West St.	Carlisle			couldridge@comcast.net
	Marisa Burton	ARC of PA	412 Perpetual Ct	West Grove	PA	19390	marisaburton@comcast.net
	Michele Planutis	Hazelton Area SD	740 4 114 01 011	DER		40400	planutism@hasd.k12.pa.us
	Theresha Collins Patty White	ARC of PA	718 Arch St. 6N	Philadelphia			tcollins@visionforequality.org pattywhitem@comcast.net
	Michael Gustine	ARC of PA State College SD	264 Hemlock Lane	Springfield	FA	13004	infandous32@yahoo.com
	Diane & Evans Pancoast	Tredyffrin-Easttown resident					pancoastfamily@comcast.net
	Marcy Collins	ARC of PA	100 Wonderly Dr	Sarver	PA.	16055	collinsma@fswp.org
	Kathi B. Caber		107-B E. Main St	Rebersurg			Kathi.Caber@healthsouth.com
735	Melissa J. Marks	PSEA	209 E. Waldhiem	Pittsburgh	PA	15215	mjm37@pitt.edu
736	Garrett Ingram	PSEA	1151 Marcia Dr	North Huntingdo	PΑ	15642	gai37725@aol.com
	Kristin Lacher	Tredyffrin-Easttown resident					kristinlacher@hotmail.com
	Monica Haley	PSEA	3722 North Woodland Circle	Gibsonia	PA	15044	mrh57@pitt.edu
	Sheila Kineke	Lower Merion SD	4405 L	•		45040	skineke@yahoo.com
	Laura Sisko Denise Sisko	PSEA	1165 Lantz Rd	Avonmore			Isisko 05@yahoo.com
	Lynn Wagner	PSEA	1165 Lantz Rd	Avonmore	FA	13010	siskos@usatek.net iwagner 0512@yahoo.com
	Kensee Roberts	PSEA	24 South Railroad St	Manor	PA	15665	kir23@pitt.edu
	Stacie Elder	PSEA	4158 State Route 982	Latrobe	PA		sle16@pitt.edu
	Alexander Rega	PSEA	819 West Smithfield St	Mount Pleasant			arr49@pitt.edu
746	Judy Pamer	ARC of PA	1650 River Rd	Beaver	PΑ	15009	kgpamer@comcast.net
747	Kevin Pamer	ARC of PA	1650 River Rd	Beaver	PΑ		kgpamer@comcast.net
	Nicole Henshaw	ARC of PA	3375 Spring Garden Rd	Pittsburgh	PA		nhenshaw@achieva.info
	Theresa Martino	ARC of PA	159 Daylesford Blvd	Berwyn			stmartino@verizon.net
	Kate Rutledge	Bucks County IU	206 Cherry St	East Greenville		18041	krut71@gmail.com
	Tina J. Koren	Whitehall-Coplay SD PSEA	4039 Caissons Ct	Whitehall Enola	PA PA	17025	mkeller@psea.org
	Mary Keller Maura Donley	PSEA	1140 Dunlin Ct	Mechanicsburg			mauradonley@comcast.net
	Pat Leo	ARC of PA	3415 Brookview Rd	Philadelphia			lpat1994@aol.com
	Patty Orr	ARC of PA	108 W. Market St	Freeburg			japaorr@verizon.net
	Mike Jones	ARC of PA	249 White Ave	Sharon			m_jones6983@yahoo.com
	Laura Bale	ARC of PA	315 S. Sterling Rd	Elkins Park	PΑ	19027	balesara@mail.com
	Linda Miller	ARC of PA	73 Locust St	Philadelphia			linda8264@comcast.net
	Diana Polec	ARC of PA	3075 Ridge Pike	Eagleville	PA		dpolec@marcpa.org
	Marian Villella Haley	West Jefferson Hills SD	114 Baker Drive				mhaley@libcom.com
	Jeanine Schultz	ARC of PA	28 South Linwood Ave	Crafton	PA	15205	ischultz@achieva.info
	Marilyn Barnett	NAACP of Pittsburgh ARC of PA	201 Beech Ln	Perkasie	PA	10044	drbamett8@aol.com
	Lori Nichol Sallie Lynagh	VALUE Coalition	1414 North Cameron St Ste				ldnslp@yahoo.com slynagh@dmpa.org
	Pam Berntsen	VALUE COMMUNITY	14 14 North Cameron St Ste	Hamsburg	FA	17 103	pam.bemtsen@unisys.com
	Renee Wright	ARC of PA	637 Unionville Rd	Kennett Square	PA	19348	larne@verizon.net
	Nancy Nisbet	ARC of PA	132 Welsh Rd	Horsham			nnisbet@growthhorizons.org
	Marion C. Alexander		16 Wagner St			17036	
769	David W. Sweet		806 Michigan Ave	Lemoyne	PΑ	17043	
770	Pam Klipa	ARC of PA	101 South Second St Ste 8	Harrisburg		17101	
	William J. Thompson	WIB of Westmoreland & Fayette Counties	145 Pavilion Ln	Youngwood		15697	
	Mrs. Hunsicher		2116 Dennis Dr	Reading	PA	19601	
	Sharyn Denham	Learning Disabiliites Assoc of PA	PO Box 208	Uwchland	PA	19480 17093	
	William Hartman Melissa Dickerson	PAESSP PPC	122 Valley Road 31 West 10th St	Summerdale Erie		16501	mdickerson@ymcaerie.org
	Frederick Douglas	NAACP	31 West loui St	Life		10001	frederickdouglas@cosmostechnolog
	16 2008						·
	Ron Domeracki	ARC of PA	1720 Weidner Court	Quakertown	PA	18951	Irdomeracki@yahoo.com
	M. Gayle Moss	Pittsburgh NAACP					drbarnett8@aol.com
779	Judith Foulke	-		Warminster	PΑ		ivylamb@aol.com
	Richard Kazis	Jobs for the Future	88 Broad St. 8th flr	Boston		02110	
	David A. Volpe	PA Highlands Community College	101 Community College Wa			15904	
	Daniel Hubert		200 Walty Nue Court	Wexford			danasuehubert@comcast.net
	Joan Contopidis	PPC	PO Box 847	Tobyhanna	PA		aconto@verizon.net tsimchak@comcast.net
		- · ·			D4		ISINICHARIOCONICASI.NEI
784	Cheryl Simchak	ARC of PA	1008 Stonehedge Drive	Coraopolis	PA	13100	
784 785	Loran Kundra	ARC of PA		Coraopolis			kundra@verizon.net
784 785 786	Loran Kundra James Wurster	- · ·	953 Rocklynn Road				kundra@verizon.net jwurster@comcast.net
784 785 786 787	Loran Kundra James Wurster KDAFFERTON	ARC of PA ARC of PA	953 Rocklynn Road	Coraopolis Springfield	PA	19064	kundra@verizon.net jwurster@comcast.net kdafferton@aol.com
784 785 786 787 788	Loran Kundra James Wurster	ARC of PA		Coraopolis	PA	19064	kundra@verizon.net iwurster@comcast.net kdafferton@aol.com sef20@pitt.edu
784 785 786 787 788 789	Loran Kundra James Wurster KDAFFERTON Sarah Fitzpatrick	ARC of PA ARC of PA	953 Rocklynn Road	Coraopolis Springfield Pittsburgh	PA PA	19064 15223	kundra@verizon.net iwurster@comcast.net kdafferton@aol.com ser20@pitt.edu contazzo@dug.edu cindyroach99@verizon.net
784 785 786 787 788 789 790 791	Loran Kundra James Wurster KDAFFERTON Sarah Fitzpatrick Frank Cortazzo Cindy E. Roach Brenda Jewell	ARC of PA ARC of PA PSEA Tredyffrin-Easttown resident ARC of PA	953 Rocklynn Road 208 East Littlewood St 850 North Hermitage Rd	Coraopolis Springfield Pittsburgh Hermitage	PA PA PA	19064 15223 16148	kundra@verizon.net ivurster@comcast.net kdafferton@ool.com sef20@pitt.edu cortazzo@duq.edu cindyroach99@verizon.net biewell@mercerarc.org
784 785 786 787 788 789 790 791 792	Loran Kundra James Wurster KDAFFERTON Sarah Fitzpatrick Frank Cortazzo Cindy E. Roach Brenda Jewell Beth Werkheiser	ARC of PA ARC of PA PSEA Tredyffrin-Easttown resident ARC of PA ARC of PA	953 Rocklynn Road 208 East Littlewood St	Coraopolis Springfield Pittsburgh	PA PA PA	19064 15223 16148	kundra@verizon.net iwurster@comcast.net kdafferton@aol.com sef20@pitt.edu cortazzo@duq.edu cindyroach99@verizon.net biewell@mercerarc.org cbawerk@verizon.net
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784 785 787 788 790 791 792 793 794 802 803 804 805 806 809 811 812 813 814 815 816 817 818 820 821 822 823 824 826 826	Loran Kundra James Wurster KDAFFERTON Sarah Fitzpatrick Frank Cortazzo Cindy E. Roach Brenda Jewell Beth Werkheiser Jeffrey Whitmer Michael P. Hruska Andrew Atkinson Nancy E. Kukovich Dan and Beth Brennan Gail Foti Anita McLean Claire Kennedy Paula B Tom Brown & Roann Pope Brown Mary Ann Cupples Barbara B. Anderson Thomas J. Gentzel Baruch Kintisch Melissa D. Patschke Jake Lopez Caroline Allen Homer C. Floyd & Stephen A. Glassma Thomas R. Chapman Jr. Arthur J. Rotthkopf Barbara Parkins David Malone Richard W. Fry James R. Herdzik Victoria C. Gehrt Cynthia C. Hoover William & Persida Himmele Stinson W. Stroup Margaret A. Lacek Leslie P. Dunleavy Garney Morris	ARC of PA ARC of PA PSEA Tredyffrin-Easttown resident ARC of PA ARC of PA Avon Grove SD Avon Grove SD United Way of Westmoreland County West Chester Area SD Tredyffrin-Easttown resident Tredyffrin-Easttown resident Tredyffrin-Easttown resident PSBA Education Law Center Spring-Ford Area SD Downingtown Area SD Pennsylvania PTA PA Human Relations Commission Reading SD U.S. Chamber of Commerce Greater Johnstown SD PA Workforce Investment Board Big Spring Sd SD of the City of Erie Kennett Consolidated SD Avon Grove SD	953 Rocklynn Road 208 East Littlewood St 850 North Hermitage Rd 342 Level Rd 1011 Old Salem Rd 1011 Old Salem Rd 471 Woodcrest Road 471 Woodcrest Road PO Box 2042 1315 Walnut St 4th fir 833 South Lewis Rd #3 126 Wallace Ave 4804 Derry St. 301 Chestnut St Ste 300 800 Washington St 1615 H Street N.W. 1091 Broad St 901 North Seventh St 45 Mount Rock Rd 148 West 21st St 300 E South St 383 S. Jennersville Rd 2579 Interstate Dr. 3541 W. Stag Dr	Coraopolis Springfield Pittsburgh Hermitage Collegeville Oxford Greensburg West Chester Strafford Mechanicsburg Philadelphia Royersford Downingtown Harrisburg Harrisburg Readling Washington Johnstown Harrisburg Newville Erie Kennett Square West Grove Harrisburg Gibsonia	PA PA PA PA PAPAPAPAPAPAPAPAPAPAPAPAPAP	19064 15223 16148 19426 15601 19087 17055 19107 19468 19335 17111 17105 179601 120062 17241 16502 17241 16502 17348 1934	kundra@verizon.net iwurster@comcast.net kdafferton@aol.com sef20@pitt.edu cortazzo@duq.edu cortazzo@duq.edu cindyroach99@verizon.net biewell@mercerarc.org cbawerk@verizon.net iwhitmer@avongrove.org mike@problemsolutions.net andrewtatkinson@hotmail.com nancy@unitedway4u.org bethbrennan@msn.com Gail55@comcast.net AnitaMclean@aol.com cdkennedy95@yahoo.com vbpaula@verizon.net roannbrown@comcast.net mcupples1410@aol.com barannbish58@aol.com tom.gentzel@psba.org bkintisch@elc-pa.org vgehrt@kcsd.org choover@avongrove.org Persida.Himmele@millersville.edu pasa@pasa-net.org Glacek33@connecttime.net lesdunleavy@verizon.net GarneyMoris@aol.com
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8:	31	Julia Watkins	Weatherly SD					watkinsplace@verizon.net
		Julie Fisher	Tredyffrin-Easttown resident	510 Green Hill Ln	Berwyn	PA	19312	jjfish3@verizon.net
8	33	Sally Coffey						coffeyshot@comcast.net
		Anne McCrory	Great Valley SD					AMcCrory@gvsd.org
		Ellen Wagner		4502 Caventa Bood	Mandahusa	В^	17109	pewagner93@comcast.net
		Sara Jane Cate Heather Karschner		4502 Coventry Road 108 Fox Hunt Drive	Harrisburg Souderton		18964	
		Lynn Foltz		409 McCreary Rd	Volant			foltzfamfive@aoi.com
		Tirannus Parr	NAACP	,,				tirannus8@hotmail.com
84	40	Debra Koller	Southern York County SD Board					Debra.Koller@sycsd.org
		Sheri Scholl	Kane Area SD Board					sscholl@kasd.net
		Stephen A. Corr	Central Bucks SD	000 0 11 0 1			40070	scorr@cbsd.org
		Lisa A. Borowski Ellen Irwin	Radnor Twp SD	852 Goshen Road	Newtown Squar	PA	19073	mlrborowski@comcast.net
-		C. Port Williams	Haverford Twp SD Huntingdon Area SD	2400 Cassady Ave Ste 2	Huntingdon	DΛ	16652	Irwin@havsd.net pwilliams@hasd.tiu.k12.pa.us
		Kim Dever	Huntinguon Area 3D	2400 Cassady Ave Ste 2	Humayuun	FA	10032	kimdever@comcast.net
_		Rumana Ali						sabrumon1@yahoo.com
		Charles Robey		PO Box 1224	Skippack	PA	19474	chasd121@yahoo.com
84	49	Lawrence A. Feinberg	Haverford Twp SD					ffeinberg@thelocalgroup.com
8	50	K.C. & Martina McCleary		1815 Mangold Road	York		17408	
		Larry Feinberg	Southeastern PA Schl Directors Education Coalit	2023 Olcott Ave	Ardmore	PA	19003	lfeinberg@thelocalgroup.com
		Kathy Fernandez						kjf1218@msn.com
		Angela Frey			York Haven	PA		atfrey@hotmail.com
		Adrian Snare Donna Benson	PAGE	1111 Delps Rd	Danielsville		19039	amsnare@comcast.net d1benson@verizon.net
		Thomas D. Longenecker	Carlisle Area SD Board	TTT Delps Nu	Carlisle	PA	10036	longeneckert@carlisleschools.org
		Gail T. Grib	Tredyffrin-Easttown resident		Çariisic	• / (gtg2285@yahoo.com
		Louise E. Donohue	Parkland SD					kressleyb@parklandsd.org
85	59	Kym Grosso	West Chester		West Chester	PA		kym.grosso@comcast.net
		Barb & Christopher Droogan	West Chester	1425 Ardleigh Circle				bdroogan@comcast.net
		Susan M. Concannon	West Chester			PΑ		sconcannon@wcasd.k12.pa.us
		Esther Smith	West Chester			PA		thesnook918@aol.com
		Laura Kerstetter	PPC PPC	1051 Green St 17 Hazel Ave				Ikerstetter@mifflinburg.org
		Leigh Kramer	Radnor Twp SD	536 West Wayne Ave				lkramer@zoominternet.net brrap@verizon.net
		Brucie Rapoport Kimm Doherty	Resident WP OD	792 Fawnhill Rd				cabbieandcook@aol.com
		Jennifer W. Leibowitz	Tredyffrin/Easttown SD	664 Joseph Dr	Wayne			jennifer,leibowitz@gemino.com
		Jim DeWitt	West Chester SD		,			idewitt@wcasd.k12.pa.us
		Carol Karl & James P. Testerman	PSEA	400 North Third St	Harrisburg	PA	17105	ckarl@psea.org
87	70	Jerry Bourdeaux			Lancaster	PA		irbourdeaux@yahoo.com
87	71	Christine M. McNicholas	Radnor Twp SD	326 Highland Lane	Bryn Mawr			mc5inpa@verizon.net
		Gary M Zibinski	West Chester SD	507 Barker Dr.	West Chester	PA	19380	zibs@msn.com
		Cindy Verguldi	Tredyffrin/Easttown				.=	cindyverg@yahoo.com
		Gerald L. Zahorchak	Department of Education	333 Market St	Harrisburg		17126	DVCt
		Patricia K. Stephens	Annville-Cleona SD Annville-Cleona SD	848 Locust Road	Annville Annville			PKStephens2@aol.com
		Kathy Murray Leisure Clarence Ben Dohner	Annville-Cleona SD Annville-Cleona SD	155 College Ave 457 South Spruce St	Annville		17003	kathymurray@comcast.net
		Don Broderick	ARC of PA	115 Meadow Ave	Scranton			dbroderick@thearcnepa.org
		Linda Cartwright	ARC of PA	41 King Way	Limerick			blsm@comcast.net
		Kia Hylick	ARC of PA	44 N. 54th St				khylick@marcpa.org
		Christine O'Donnell	ARC of PA	3007 Lenape Dr	Collegeville			christinejodonnell@hotmail.com
88	82	Rachel Perlman	ARC of PA	302 Bryn Mawr Ave	Bala Cynwyd	PΑ	19004	rachperl@comcast.net
		Laura Bessen-Nichtberger	ARC of PA	501 Northwick Lane				laura.bessen@verizon.net
		John Klouser	ARC of PA	6263 Erdrick St				jakester419@comcast.net
		Laural Schwartz	ARC of PA	248 Arlingham Rd				laurel schwartz@hotmail.com
		Nicole Rodgers	ARC of PA ARC of PA	1035 Cold Stream Circle Apt 588 Tyson Ave	Emmaus Glenside			nicnate1024@verizon.net
		Patrick Hughes Theodore Dmytryk		67 Village Drive				pjh526@msn.com tedmytryk@comcast.net
		Rosemarie Dmytryk	ARC of PA	67 Village Drive				rdmytryk@comcast_net
		Mary Maxey	ARC of PA	1817 Carson Dr	Norristown			mfmaxey@aol.com
		Karen & Steve Friedman	Tredyffrin/Easttown SD	5 Briar Rd	Wayne		19087	
89	92	Cecilia & Ignacio Magana	Tredyffrin/Easttown SD					cclmagana@yahoo.com.mx
88	93	Claudia Dugan	Radnor Twp SD					michaeldugan@earthlink.net
89	94	Debbie Bookstaber	Tredyffrin/Easttown SD	307 Irish Rd	Berwyn	PA		debbie@utango.com
		Sharon J. Lamb	Tredyffrin/Easttown SD					sharon.lamb@comcast.net
		Elizabeth H. Ward	Tredyffrin/Easttown SD Tredyffrin/Easttown SD					ehward@verizon.net frigerio@comcast.net
		Shannon Frigerio Cheryl Bergsma	Tredyffrin/Eastlown SD	271 Irish Road	Berwyn	DΔ		bumperpa@msn.com
		Samatha Ballard	Tredyffrin/Easttown SD	271 11011 11000	20,11,11			snb537@yahoo.com
		Marybeth Panaro	Tredyffrin/Easttown SD					panaro@fast.net
		Jennifer & John Conger	Tredyffrin/Easttown SD					jconger5@verizon.net
		Dottie Stinson	Tredyffrin/Easttown SD	208 Walker Rd	Wayne	PA	19087	Law19087@aol.com
		Sandi Gorman	Tredyffrin/Easttown SD					sjg1566@mac.com
		Todd Kantorczyk	Tredyffrin/Easttown SD	1050 Mast Charter Diller	\Along =	D.	10000	Tkantorczyk@mgkflaw.com
		Kelly Fick Lois Tabis	PSEA PSEA	1650 West Chester Pike Apt 1330 Skyline Drive	Wayne Hermitage			kellyfick@comcast.net tabis@roadrunner.com
		Lois Tabis Ashley Smith	PSEA PSEA	504 Cubbage St	Camegie			ahs15@pitt.edu
		Ashleigh Keyes	PSEA	110 Monath St		PA	15089	speaker 4 him@yahoo.com
		Maria & Peter Neeson	Radnor Twp SD	230 Windermere Ave	Wayne	PA	19087	mpneeson@comcast.net
		Gretchen A. Guttman	Tredyffrin/Easttown SD	852 Nathan Hale Road	Berwyn			tguttman@comcast.net
		Greg McNicholas	Radnor Twp SD					Greg.McNicholas@nbcuni.com
		Steven Appel	ARC of PA	1940 Old Forty Foot Rd	Harleysville			stevenappel@comcast.net
		Steven Gerber	Radnor Twp SD	609 Radnor Valley Dr	Villanova		19085	Sgerber@cozen.com
		William Kaufman	Riverview IU #6	EDE Steeny Hollow Da	Clarion	PA	15000	wkaufman@riu6.org
		David Huston Dawn & Jack Vanden Heuvel		505 Sleepy Hollow Rd	Pittsburgh	rΑ	19278	wq3t@hotmail.com dawnvh@hotmail.com
		Natalie Sudall	Tredyffrin/Easttown SD					nsudall@verizon.net
		Cynthia Mady McCarthy	Spring-Ford SD					mccarthy@medigroupitd.com
		Christina Chusid	Tredyffrin/Easttown SD	446 Green Hill Lane	Berwyn	PA		christina.chusid@verizon.net
		Michael Kelly	Lower Merion SD		•			KellvMichael@Imsd.org
		Lee Melchiorre	Tredyffrin/Easttown SD					melchior1@verizon.net
		Francine Bailey	Upper Merion SD					franbailey@msn.com
		Rita Hillwig	To deficie (Tooks)	4000 1/ 1	D - 4-	. .	4000-	hillwigs@innemet.net
		Maria Kalilec	Tredyffrin/Easttown SD	1306 Karen Lane	Radnor			mkalilec@hotmail.com
		Ashley Waszkiewicz	PSEA Chaster County II I	1000 Conestoga Rd Apt B12	Bryn Mawr	PΑ	19010	ashwasz@yahoo.com
		Karen T. Brendle Karen Strohm	Chester County IU PSEA	813 S. 17th St	Philadelphia	PΔ	19146	KarenB@cciu.org kstrohm23@aol.com
		Amber Dongilli	PSEA	413 Redstone Church Rd	Perryopolis			ald56@pitt.edu
		Alicen L. Graupner	PSEA	107 N. Broad St	Kennett Square			agraupner@avongrove.org
		Molly Baxter	PSEA	606 Madison St	Mohnton			mollybaxter@hotmail.com
		Kevin D. Finan	Garnet Valley SD					finank@gametvalleyschools.com
93	32	Debra C. Sanzi						deb@sanzi.com
		Brian Goppman	PSEA	953 Garden City Drive	Monroeville			brg18@pitt.edu
		Bob Muehlbach	PSEA	138 Cullen Road	Oxford	PA	19363	bmuehlbach@avongrove.org
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	22 2008 Robert L. Williams	Williamsport Area SD	136 Grimesville Road	Williamsport	PA	17701	rwilliam@wasd.org
	Sherilyn Jameson						sherilyn@calvarysc.org
	An-Nisa Knight	T. 1 W. 5					An-nisa Knight@va.gov
	Allison Hayden Elmer D. Gates	Tredyffrin/Easttown SD Embassy Bank for the Lehigh Valley	100 Gateway Drive	Bethlehem	PΑ	18017	luvmygiants@verizon.net epongito@yahoo.com
	Amanda L. Brant	PSEA	207 Coldren Street	Johnstown			alb105@pitt.edu
	Adeline M. Brynildsen	PSEA	87 Airport Road	Nottingham	PΑ	19362	abrynildsen@aol.com
	Lisa Mursiack	Pine-Richland SD	104 Ridings lane	Doylestown	DΔ	18001	murslack@zoominternet.net ilaquer@comcast.net
	Mary Jane Laquer Helen Miller	Gov. Advisory Com. On Library Dev	414 East Gravers Lane	Philadelphia			lillie14@verizon.net
	Carol Railsback	,,,					carolzr@excite.com
	Laura Sibson	ARC of PA	513 Revere Road				Isibson@comcast.net
	Alison Gerber Terry Kinavey	West Jefferson Hills SD	1843 South Mole Street	Philadelphia	PA	19145	agerber@bucksiu.org mkovus@wihsd.org
	Richard C. Wallace	University of Pittsburgh	230 South Bouquet St 5605	Pittsburgh	PA	15260	
	Robert E. Terrill	Warren County SD	185 Hospital Drive	Warren		16365	
	Gerald W. Kohn	Harrisburg SD Carlisle Area SD Board	2101 North Front St 623 W. Penn St.			17110 17013	
	Fred D. Baldwin Deborah L. Miller	Canisie Area SD Board	1730 Walnut Hill Blvd			19063	
	Keith Morgan	Troy Area SD Board	310 Elmira St	Troy	PΑ	16947	
	Don C. Vymozal	Kutztown Area SD Board	50 Trexler Ave			19530	
	Joan M. Thomas Marcia E. Peters	ARC of PA	2716 Pine Valley Ln 416 Barberry Dr	Ardmore Hanover		19003 17331	
	Elaine Caffarelli			714110101			ecaffare@dejazzd.com
	Dave Wilson						toma4321@peoplepc.com
	Kathy and David Chavara Andrew Leibowitz	Pine-Richland SD Tredyffrin-Easttown resident					chavaras@zoominternet.net aleibowitz@bostonassoc.com
	Pittsburgh Post Gazette	redynnir-Lastown resident					www.post-gazette.com
July 3	3 2008						
	Dave Jameson	Conneaut SD Board	210 Most School Drive	Linomillo	DΛ	16424	doi11@scasd.org
	David Schaef Austin J. Burke	Greater Scranton Chamber of Commerce	219 West School Drive P.O. Box 431			18501	
966	Elizabeth Snyder	PSEA	2142 Reindeer Ct	Gilbertsville	PΑ	19525	betsysnder2@comcast.net
967	Jane E. Peet	PSEA	1117 Lake Henry Rd				janepeet@gmail.com
	Wendy Greenawalt Eric Pringle	ARC of PA PSEA	174 Bleile Rd 20 Kendall Drive				lilladyxo@verizon.net pringlee@verizon.net
	Mary Coviello	PSEA PSEA	927 Apple Tree Road				mmcislandgirl@hotmail.com
	Rep. James R. Roebuck & Rep. Jess S		208 Irvis Office Bldg			17120	
	11 2008	West Barrio OD Barris	2000 Ch V-II D	FW-44-1	D4	47004	
	Charles Thiemann Amy Tierman	West Perry SD Board Tredyffrin Eastown SD	2606 Shermans Valley Road 815 Caldwell Road			17024 19087	amytieman@comcast_net
	Ilze Rekis Berzins	nedymin Lastown GD	3920 Countrywood Ln	Hatboro			lizerb@aol.com
July 2	22 2008		•				
	Christian Jaspersen	Marple Newtown SD	•				ciaspersen@mnsd.org
	Dawn D. Dunn st 4 2008	Kennett Consolidated SD Board					ddunn@kcsd.org
	Don & Kathy Seaton						donandkathyseaton@connecttime.n
	Emily Sturman	Pine-Richland SD					gothicbaroque616@gmail.com
	ember 2 2008 Patrice Masluk Schwartzman		523 Paxinosa Road East	Easton	DΔ	18040-	patricemschwartzman@verizon.net
	Tiffany Kaszmetskie		727 Tamarack Trail				ivgotahalo@hotmail.com
981	Sherry Wright		4181 Enders Way	Doylestown	PΑ	18902-	shrrywright1@gmail.com
	Andrea G. Fiorentino						afiorentino@mnsd.org
	mber 19 2008 Mark Nigro	PSEA	361 Main Street	Leechburg	PA	15656-	markenigro@comcast.net
	Kirk Hawk	PSEA	741 Johnston Drive	Bethlehem			hawkk@eastonsd.org
985	Christopher SantaMaria	PSEA	306 Parsons Ave	Bala Cynwyd	PA	19004-	Imeducationassoc@comcast.net
986	Pam Artese						partese@rcn.com
	Cynthia Wright	Wilmington Area SD	450 Wood Street	New Wilmington	PA	16142	wright@wilmington.k12.pa.us
	Joseph P. Acri	PAESSP	P.O. Box 39			17093	
	William R. Hartman Sandy M. Homel	PAESSP Centennial SD	P.O. Box 39 433 Centennial Rd	Summerdale Warminister		17093 18974-	
	Salidy M. Homes	Learning Disabilities Assoc. of PA, Inc	4751 Lindle Rd. Suite 114	Harrisburg		17111	
	Sharvn Denham						
992	Sharyn Denham Thomas H. DeWall	PA Psychological Assoc.	416 Forster St.	Harrisburg	PA	17102	
992 993	Thomas H. DeWall Dave F. Brown		10Llanfair Rd. #11	Ardmore	PA PA	17102 19003	brownshu95@verizon.net
992 993 994	Thomas H. DeWall Dave F. Brown Paul I. Clymer	House Education Committee	10Llanfair Rd. #11 P.O. Box 202145	Ardmore Harrisburg	PA PA PA	17102 19003 17120-	<u>brownshu95@verizon.net</u> 2145
992 993 994 995 996	Thomas H. DeWall Dave F. Brown Paul I. Clymer William H. Kinavey Carolyn A. Boice	House Education Committee Steel Valley S.D. Pine-Richland SD	10Llanfair Rd. #11 P.O. Box 202145 220 East Oliver Rd 702 Warrendale Rd	Ardmore Harrisburg Munhall Gibsonia	PA PA PA PA	17102 19003 17120- 15120 15044	brownshu95@verizon.net 2145
992 993 994 995 996 997	Thomas H. DeWall Dave F. Brown Paul I. Clymer William H. Kinavey Carolyn A. Boice Sen. Jeffrey Piccola	House Education Committee Steel Valley S.D.	10Llanfair Rd. #11 P.O. Box 202145 220 East Oliver Rd 702 Warrendale Rd Senate Box 203015	Ardmore Harrisburg Munhall Gibsonia Harrisburg	PA PA PA PA PA	17102 19003 17120- 15120 15044 17120-	brownshu95@verizon.net 2145 3015
992 993 994 995 996 997 998	Thomas H. DeWall Dave F. Brown Paul I. Clymer William H. Kinavey Carolyn A. Boice Sen. Jeffrey Piccola Jerl J. Goldman	House Education Committee Steel Valley S.D. Pine-Richland SD	10Llanfair Rd. #11 P.O. Box 202145 220 East Oliver Rd 702 Warrendale Rd Senate Box 203015 1000 Pinetown Rd	Ardmore Harrisburg Munhall Gibsonia Harrisburg Fort Washingto	PA PA PA PA PA PA	17102 19003 17120- 15120 15044 17120- 190334	brownshu95@verizon.net 2145 3015 i erigoldman@comcast.net
992 993 994 995 996 997 998 999	Thomas H. DeWall Dave F. Brown Paul I. Clymer William H. Kinavey Carolyn A. Boice Sen. Jeffrey Piccola	House Education Committee Steel Valley S.D. Pine-Richland SD Senate Education Committee	10Llanfair Rd. #11 P.O. Box 202145 220 East Oliver Rd 702 Warrendale Rd Senate Box 203015 1000 Pinetown Rd 7210 Lincoln Drive 308 Summit View	Ardmore Harrisburg Munhall Gibsonia Harrisburg Fort Washingto Philadetphia Carlisle	PA PA PA PA PA PA PA	17102 19003 17120- 15120 15044 17120- 190334 19119 17013	brownshu95@verizon.net 2145 3015 ierigoldman@comcast.net elliottseif@verizon.net wcleland@pa.net
992 993 994 995 996 997 998 999 1000 1001	Thomas H. DeWall Dave F. Brown Paul I. Clymer William H. Kinavey Carolyn A. Boice Sen. Jeffrey Piccola Jeri J. Goldman Elliott Seif Winston Cleland Karen E. Jez	House Education Committee Steel Valley S.D. Pine-Richland SD Senate Education Committee PASCD Titusville Area SD	10Llanfair Rd. #11 P.O. Box 202145 220 East Oliver Rd 702 Warrendale Rd Senate Box 203015 1000 Pinetown Rd 7210 Lincoln Drive 308 Summit View 221 North Washington St.	Ardmore Harrisburg Munhall Gibsonia Harrisburg Fort Washingto Philadelphia Carlisle Titusviile	PA PA PA PA PA PA PA PA	17102 19003 17120- 15120 15044 17120- 190334 19119 17013 16354-	brownshu95@verizon.net 2145 3015 ierigoldman@comcast.net elliottseif@verizon.net wcleland@pa.net
992 993 994 995 996 997 998 999 1000 1001 1002	Thomas H. DeWall Dave F. Brown Paul I. Clymer William H. Kinavey Carolyn A. Boice Sen. Jeffrey Piccola Jeri J. Goldman Elliott Seif Winston Cleland Karen E. Jez Deborah M. Jackson	House Education Committee Steel Valley S.D. Pine-Richland SD Senate Education Committee PASCD Titusville Area SD Burgettstown Area SD	10Llanfair Rd. #11 P.O. Box 202145 220 East Oliver Rd 702 Warrendale Rd Senate Box 203015 1000 Pinetown Rd 7210 Lincoln Drive 308 Summit View 221 North Washington St. 100 Bavington Road	Ardmore Harrisburg Munhall Gibsonia Harrisburg Fort Washingto Philadelphia Carlisle Titusville Burgettstown	PA PA PA PA PA PA PA PA PA	17102 19003 17120- 15120 15044 17120- 19033- 19119 17013 16354- 15021	brownshu95@verizon.net 2145 3015 ieingoldman@comcast.net elliottseif@verizon.net wcleland@pa.net 1785
992 993 994 995 996 997 998 999 1000 1001 1002	Thomas H. DeWall Dave F. Brown Paul I. Clymer William H. Kinavey Carolyn A. Boice Sen. Jeffrey Piccola Jeri J. Goldman Elliott Seif Winston Cleland Karen E. Jez	House Education Committee Steel Valley S.D. Pine-Richland SD Senate Education Committee PASCD Titusville Area SD Burgettstown Area SD Great Valley SD	10Llanfair Rd. #11 P.O. Box 202145 220 East Oliver Rd 702 Warrendale Rd Senate Box 203015 1000 Pinetown Rd 7210 Lincoln Drive 308 Summit View 221 North Washington St.	Ardmore Harrisburg Munhall Gibsonia Harrisburg Fort Washingto Philadelphia Carlisle Titusviile	PA PA PA PA PA PA PA PA PA	17102 19003 17120- 15120 15044 17120- 19033- 19119 17013 16354- 15021	brownshu95@verizon.net 2145 3015 ierigoldman@comcast.net elliottseif@verizon.net wcleland@pa.net
992 993 994 995 996 997 998 999 1000 1001 1002 1003	Thomas H. DeWall Dave F. Brown Paul I. Clymer William H. Kinavey Carolyn A. Boice Sen. Jeffrey Piccola Jeri J. Goldman Elliott Seif Winston Cleland Karen E. Jez Deborah M. Jackson Rita S. Jones Aug-09 Gerald B. Rosati	House Education Committee Steel Valley S.D. Pine-Richland SD Senate Education Committee PASCD Titusville Area SD Burgettstown Area SD	10Llanfair Rd. #11 P.O. Box 202145 220 East Oliver Rd 702 Warrendale Rd Senate Box 203015 1000 Pinetown Rd 7210 Lincoln Drive 308 Summit View 221 North Washington St. 100 Bavington Road	Ardmore Harrisburg Munhall Gibsonia Harrisburg Fort Washingto Philadelphia Carlisle Titusville Burgettstown	PA PA PA PA PA PA PA PA PA	17102 19003 17120- 15120 15044 17120- 19033- 19119 17013 16354- 15021	brownshu95@verizon.net 2145 3015 ierigoldman@comcast.net elliottseif@verizon.net wcleland@pa.net 1785 rjones@gvsd.org
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992 993 994 995 996 997 998 999 1000 1001 1002 1003	Thomas H. DeWall Dave F. Brown Paul I. Clymer William H. Kinavey Carolyn A. Boice Sen. Jeffrey Piccola Jeri J. Goldman Elliott Seif Winston Cleland Karen E. Jez Deborah M. Jackson Rita S. Jones Aug-09 Gerald B. Rosati Veronica Wade	House Education Committee Steel Valley S.D. Pine-Richland SD Senate Education Committee PASCD Titusville Area SD Burgettstown Area SD Great Valley SD	10Llanfair Rd. #11 P.O. Box 202145 220 East Oliver Rd 702 Warrendale Rd Senate Box 203015 1000 Pinetown Rd 7210 Lincoln Drive 308 Summit View 221 North Washington St. 100 Bavington Road 47 Church Road	Ardmore Harrisburg Munhall Gibsonia Harrisburg Fort Washingto Philadelphia Cartisle Tittusville Burgettstown Malvern Ephrata	PA PA PA PA PA PA PA PA PA PA PA	17102 19003 17120- 15120 15044 17120- 19033- 19119 17013 16354- 15021 19355 17522	brownshu95@verizon.net 2145 3015 jerigoldman@comcast.net elliottself@verizon.net wcleland@pa.net 1785 riones@gvsd.org veronica.wade@bnymellon.com
992 993 994 995 996 997 998 999 1000 1001 1002 1003 1004 1005 1006 1007 1008	Thomas H. DeWall Dave F. Brown Paul I. Clymer William H. Kinavey Carolyn A. Boice Sen. Jeffrey Piccola Jen J. Goldman Elliott Seif Winston Cleland Karen E. Jez Deborah M. Jackson Rita S. Jones Aug-09 Gerald B. Rosati Veronica Wade Kristofer A. Pfitzenmeyer Pam Klipa Cathy Moretti Jane Clare Orie	House Education Committee Steel Valley S.D. Pine-Richland SD Senate Education Committee PASCD Titusville Area SD Burgettstown Area SD Great Valley SD Ephrata Area SD The Arc of Pennsylvania Allegheny Valley SD	10Llanfair Rd. #11 P.O. Box 202145 220 East Oliver Rd 702 Warrendale Rd Senate Box 203015 1000 Pinetown Rd 7210 Lincoln Drive 308 Summit Vlew 221 North Washington St. 100 Bavington Road 47 Church Road 803 Oak Boulevard	Ardmore Harrisburg Munhall Gibsonia Harrisburg Fort Washingto Philadeiphia Carlisla Titusville Burgettstown Malvern Ephrata Harrisburg Cheswick	PA PA PA PA PA PA PA PA PA PA PA PA	17102 19003 17120- 15120 15044 17120- 19033- 19119 17013 16354- 15021 19355 17522	brownshu95@verizon.net 2145 3015 ierigoldman@comcast.net elliottseif@verizon.net wcleland@pa.net 1785 riones@gvsd.org veronica.wade@bnymellon.com kpfitzen@hup.edu pklipa@thearcpa.org cmoretti@avsd.k12.pa.us
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992 993 994 995 996 997 998 999 1000 1001 1002 1003 1004 1005 1006 1007 1008 1010 1011	Thomas H. DeWall Dave F. Brown Paul I. Clymer William H. Kinavey Carolyn A. Boice Sen. Jeffrey Piccola Jen J. Goldman Elliott Seif Winston Cleland Karen E. Jez Deborah M. Jackson Rita S. Jones Aug-09 Gerald B. Rosati Veronica Wade Kristofer A. Pfitzenmeyer Pam Klipa Cathy Moretti Jane Clare Orie	House Education Committee Steel Valley S.D. Pine-Richland SD Senate Education Committee PASCD Titusville Area SD Burgettstown Area SD Great Valley SD Ephrata Area SD The Arc of Pennsylvania Allegheny Valley SD	10Llanfair Rd. #11 P.O. Box 202145 220 East Oliver Rd 702 Warrendale Rd Senate Box 203015 1000 Pinetown Rd 7210 Lincoln Drive 308 Summit View 221 North Washington St. 100 Bavington Road 47 Church Road 803 Cak Boulevard 101 South Second St. Suite 300 Pearl Avenue	Ardmore Harrisburg Munhall Gibsonia Harrisburg Fort Washingto Philadeiphia Carlisla Titusville Burgettstown Malvern Ephrata Harrisburg Cheswick	PA PA PA PA PA PA PA PA PA PA PA PA	17102 19003 17120- 15120 15044 17120- 19033- 19119 17013 16354- 15021 19355 17522	brownshu95@verizon.net 2145 3015 ieirigoldman@comcast.net elliottseif@verizon.net wcleland@pa.net 1785 rjones@gvsd.org veronica.wade@bnymellon.com kpfitzen@hup.edu pklipa@thearcpa.org cmoretti@avsd.k12.pa.us dksmith@kathleen-douglas.com dbeli@norleb.k12.pa.us
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1031	Ruth Bell	South Fayette Township Board of School Directo	3680 Old Oakdale Road	McDonald	PΑ	15057	bell@southfayette.org
	Sari McNamara	Total Capacita Communication C			• • • •		sari mcnamara@fcasd.edu
1033	Andrea Williams	Wilkinsburg School District					williamsa@wilkinsburgschools.org
	Larry Mayes	Antietam School District	5 4				lmayes@antietamsd.org
	Denis Clark	:					dennis.clark.benw@statefarm.com
	Richard Gusick						GusickR@TESD.NET
	Rose Mary Ryan	North Allegheny School Board					myan@northallegheny.org
	Atalanta M. Shabloski	Wellsboro Area School District					titlesearcher@epix.net
	Lynn L. Foltz	Wimington Area School Director					foltzfamfive@aol.com
	Anita Cron	The state of the s					Acron@pennridge.org
	Janet E. Wolff	Owen J. Roberts School District	901 Ridge Road	Pottstown	PA	19465	jwolff@ojrsd.com
	Mark B. Miller	Centennial SD					MillMB@centennialsd.org
	Kimberly D. Geyer	Mars Research & Retrieval Services	451 Denny Road	Valencia	PΑ	16059	
	Joan L. Benso	PA Partnerships for Children	116 Pine Street Suite 430	Harrisburg	,	17101	
	Elliott Seif			Philadelphia	PA		elliottseif@verizon.net
	Sen. Jane Clare Orie	Senate of Pennsylvania	Senate Box 203040	Harrisburg			jorie@pasen.gov
	Joan Duvall-Flynn	PA State Conference of NAACP	2011410 2011 2000 10				13.13.00.11.11.11.11
	Rep. Stanley E. Saylor	PA House of Representatives	414 Main Capitol Bldg	Harrisburg	PA	17.120	ssaylor@pahousegop.com
	Mark B. Miller	Centennial School District					MillMB@centennialsd.org
	Gerald B. Rosati	Ephrata Area School District	803 Oak Boulevard	Ephrata	PA	17522	
	Veronica Wade			-pu-	• • •		veronica.wade@bnymellon.com
1052	Kristofer A. Pfitzenmeyer						kpfitzen@lhup.edu
	Kathleen Smith	Canon-McMillan School Board					dksmith@kathleen-douglas.com
	Cathy Moretti	Allegheny Valley School District	300 Pearl Ave.	Cheswick	PA	15024	cmoretti@avsd.k12.pa.us
	Patricia P. Green	North Allegheny School Board					myan@northallegheny.org
1056	Larry Mayes	Antietam School District					lmayes@antietamsd.org
	Atalanta M. Shabloski	Wellsboro Area School District					titlesearcher@epix.net
1058	Lynn L. Foltz	Wilmington Area School Director					foltzfamfive@aol.com
	Richard Gusick	Tredyffrin/Easttown School Board					GusickR@TESD.NET
1060	Lawrence A. Feinberg	Delaware County School Boards Legis Council					feinberg@thelocalgroup.com
1061	Laureen Dowd	Northgate School Board					ldowd@northgate.k12.pa.us
1062	Don Bell	Northern Lebanon School District					dbell@norleb.k12.pa.us
1063	Emily Gudewicz	Chartiers Valley School District					egudewica@cvsd.net
1064	Anita Cron	Pennridge School District					Acron@pennridge.org
1065	Maureen M. Grosheider	North Allegheny School Board					rryan@northallegheny.org
1066	Rich Davies						rdavies@penn-eng.com
1067	Shauna M. D'Alessandro	South Hills Area School Districts Assoc	*				shaunacpa@comcast.net
1068	Marge Brown	Garnet Valley Board of School Directors					BrownM@garnetvalleyschools.com
	Linda Hippert	Allegheny Intermediate Unit	475 E. Waterfront Dr	Homestead	PA	15120	linda.hippert@aiu3.net
	Tim Allwein	PA School Boards Association	P.O. Box 2042	Mechanicsburg			



Commonwealth of Pennsylvania STATE BOARD OF EDUCATION

September 21, 2009

Mr. Kim Kaufman Chairman Independent Regulatory Review Commission 14th Floor, 333 Market Street Harrisburg, PA 17126

Dear Mr. Kaufman:

Enclosed is a copy of final form State Board of Education regulation 22 Pa. Code, Chapter 4 – Academic Standards and Assessment (#006-312) for review and action by the Commission pursuant to section 5(c) of the Regulatory Review Act.

The State Board of Education will provide the Commission with any assistance it requires to facilitate a thorough review of this final-form regulation.

Thank you for your consideration.

Sincerely,

Joe Torsella Chairman

Enclosure

cc:

Secretary Zahorchak Gregory Dunlap, Esq. Teresa Colarusso

TRANSMITTAL SHEET FOR REGULATIONS SUBJECT TO THE REGULATORY REVIEW ACT

I.D. NUMBER	R: 6-312
SUBJECT:	ACADEMIC STANDARDS AND ASSESSMENT
AGENCY:	STATE BOARD OF EDUCATION
	TYPE OF REGULATION Proposed Regulation
X	Final Regulation
	Final Regulation with Notice of Proposed Rulemaking Omitted
	120-day Emergency Certification of the Attorney General
	120-day Emergency Certification of the Governor
	Delivery of Tolled Regulation a. With Revisions b. Without Revisions
	FILING OF REGULATION
DATE	SIGNATURE DESIGNATION
921-08 dps	HOUSE COMMITTEE ON EDUCATION
9-21-09 E	Gleen Krick MAJORITY CHAIRMAN Roebuck
9-21-09	SENATE COMMITTEE ON EDUCATION
	MAJORITY CHAIRMAN Piccola
9/21/09	Kathy Coper independent regulatory review commission
	ATTORNEY GENERAL (for Final Omitted only)
	LEGISLATIVE REFERENCE BUREAU (for Proposed only)