

2696

From: Julianna Morrell [jmorrell@bentworth.k12.pa.us]
Sent: Monday, September 28, 2009 1:44 PM
To: IRRC
Attachments: IRRC Letter from Parents on Keystone Exams August 20091.doc; IRRC Comment letter on Torsella Keystone Exams 9-20-09.doc; ATT5414770.txt

Please see attached letters. Thank you. Julianna Morrell

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INDIANAPOLIS
INDEPENDENT REGULATORY
COMMISSION

September 28, 2009

To Whom It May Concern:

I am writing to express my opposition to the current proposed final form Chapter 4 regulations to require Keystone Exams as end of course/graduation requirements for students.

The "meaning" of a high school diploma is quantified by employers and colleges in the grade point average and the SAT scores. This plan will unfairly distort the "meaning" of the Grade Point Average by factoring the value of one standardized test score to count for 1/3 of a student's grade.

It is unreasonable that students scoring below basic on a Keystone Exam or on a module get NO credit for what they do know, but instead will be given a 0% for 1/3 of their grade, rather than the score they have earned on the test. The weight of 1/3 and the 0% floor will unfairly affect students competing for acceptance into colleges and for scholarships.

It is unfair that students who score Proficient will have that score count as 1/3 of their grade with no chance to increase that score, while other students who may score slightly less than Proficient will have another opportunity to raise 1/3 of their grade by re-taking the exam.

Replacing our rigorous mid-terms and finals with Keystone Exams will serve to narrow the curriculum in high schools across this state. For example, it is not educationally in the best interest of students to administer the same Keystone Exam to students in General Biology, Accelerated Biology, and Honors Biology, replacing the assessments that have been designed to reflect the rigor of those various courses.

Although the proposed Bridge Project offers an alternative pathway to allow some bonus points, the weighting and 0% floor in this plan, and resulting effect on GPA, causes the Keystone Exams to be more "high-stakes" than the original "pass/fail" GCA Plan.

Even though the Maryland Plan offers Bridge Projects, Maryland's student dropout rate last year increased to over 27,000, just as the dropout rates have increased in other states that use exit/end of course exams (CA, FL, MA, OH, etc.).

Not all students in Pennsylvania have access to the same resources in the classroom, and those resources are reflected in the facilities, the classroom materials, and in the quality of the teachers. It is not fair to measure all students by the same measuring stick and withhold a diploma on that basis.

The costs of staffing 10 qualified professionals for summer remediation for ten subject areas, staffing of coaches for Bridge Projects, record keeping costs, test and Bridge project administration and scoring, new K-12 textbooks to align with statewide K-12 curriculum, professional development, and bus transportation will divert scarce resources out of the classroom on a plan that has no basis in research and will force us to cut other worthwhile, proven programs.

The logistics of staging summer remediation during the months when necessary maintenance, repairs, and improvements to our facilities are to occur is an unreasonable demand on our school districts and presents a safety issue for students.

The current assessment system, along with the state's investment in PVAAS, already tells us what we need to know and which students need help. Another set of high stakes tests to tell us what we already know, is a waste of resources. Money should be spent teaching rather than in more testing.

George and Julianna Morrell

40 North Pine St.

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September 28, 2009

Independent Regulatory Review Commission
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SUBJECT: Issue #2696 Keystone Exams

Dear Members of the IRRC,

I am opposed to the changes to Pennsylvania's Graduation requirements that include Keystone Exams. The following concerns raised by the IRRC when reviewing the draft regulatory changes.

1. Health, safety and welfare. Initial concerns were raised that the new regulations may raise drop-out rates. Although several undefined measures to allow for alternative testing have been included in the final form regulations, the Board has not yet demonstrated how the institution of end-of-course exams as a graduation requirement will not raise the dropout rate.
2. Fiscal impact. Original concerns were raised by the IRRC about the fiscal impact on Districts. In addition to paying one-half the undefined costs of local assessment validation, the following costs are unaddressed by the regulations:
 - a. Curriculum redesign costs.
 - b. Remedial costs – summer school staffing, bussing, professional development, Bridge Project coaching (staff) and costs of test administration paid to IUs.
 - c. Testing administration. Schools will need to dedicate personnel to the administration of 10 Keystone Exams or local assessments. This requires careful planning, facilities considerations, proctoring, collection, and return of testing materials.
 - d. Retesting administration.
 - e. Communications. Schools will need to develop a communications plan for students and parents to explain the complicated new system.
 - f. Local assessment development – costs of development of local assessments and the validation costs of those assessments renders the local assessment option to be not-an-option with the Keystone Exams being the only choice for districts with tight budgets. In effect, Pennsylvania will have a two-class standard for graduation, further harming economically disadvantaged students.
 - g. Local assessment scoring.
 - h. Monitoring student proficiency for graduation.

- i. Race to the Top Funding is not an option unless the test scores are tied to teacher evaluations. Pennsylvania does not allow for assessing teacher performance based on student test scores.
3. Need for regulation. The IRRC has noted that the Board has failed to demonstrate a need for the regulation. The final form regulations still do not demonstrate this need. The Department of Education gathered information about local assessments for the first time in September 2008. That study itself was not valid. It was to be a two-part study, yet there has been no Part 2. The Study did not reveal that only 18 school districts have valid local assessments. The Study said that based on the information that they received, they did not have sufficient information to determine the validity of local assessments for the remaining districts. Many districts did not respond to the request because the information was requested during a time when many teachers had not yet returned to school to gather that information and when districts were in process of back-to-school duties. The Board has failed to demonstrate why the department cannot use this information that was gathered to provide technical assistance for Districts to improve local assessments without enacting the regulations.

4. Reasonableness of implementation. From the IRRC's initial comments:

“Tracking the progress of each student in each of the subject matters, scheduling students to take a test or retake a test (or a module of a particular test) and providing remediation are all significant tasks that will require a large amount of a school district's resources and will dictate summer school remediation for the summer and fall test retakes. A detailed explanation of how a school district is expected to implement this regulation and why the Board believes this approach is reasonable should be included in the Preamble to the final-form regulation.”

The final form regulations do not contain such an explanation.

5. Statutory authority. During the initial public comment period, it was called into question by the General Assembly and members of the public whether the State Board has the statutory authority to determine specific graduation requirements. The IRRC has called upon the Board to address this concern, and the Board has failed to do so.
6. Legislative Intent. HB Resolution 456, a Joint Concurrent Bipartisan Resolution Co-sponsored by Representatives Clymer and Youngblood, has co-sponsor signatures of 80% of the House Assembly. SB 281 legislation which would require that changes in graduation requirements have the approval of the legislature, passed the Senate by a vote of 48-1. This regulation does not reflect the intent of the legislature.

Based upon the failure of the State Board address the original concerns by the IRRC, I ask that you vote to disapprove the final form regulations.

Yours truly,

Julianna Morrell
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