

September 29, 2009

Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

SUBJECT: Issue #2696 Keystone Exams

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INDEPENDENT REGULATORY
REVIEW COMMISSION

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Dear Members of the IRRC:

I am opposed to the changes to Pennsylvania's high school graduation requirements known as the Keystone Exams which are not in the public interest.

1. **Adverse fiscal impact on local school districts.** The following costs are unaddressed by the Keystone Exam regulations:
 - a. Curriculum redesign costs.
 - b. Remedial costs – summer school staffing, bussing, professional development, Bridge Project coaching (of staff) and costs of test administration.
 - c. Testing and retesting administration. Schools will need to dedicate personnel to the administration of ten Keystone Exams or local assessments. This requires careful planning, facilities considerations, proctoring, collection, and return of testing materials.
 - d. Local assessment development – costs of development of local assessments and the validation costs of those assessments renders the local assessment option out of reach for districts with tight budgets. In effect, Pennsylvania will have a two-class standard for graduation, further harming economically disadvantaged students.
2. **Need for regulation.** The IRRC has noted that the Board has failed to demonstrate a need for the Keystone Exams. The final form regulations still do not demonstrate this need.
3. **Legislative Intent.** House Resolution 456, a Joint Concurrent Bipartisan Resolution Co-sponsored by Representatives Clymer and Youngblood, has co-sponsor signatures of 80% of the Pennsylvania House of Representatives. 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. The Keystone Exams regulation does not reflect the intent of the legislature.

Based upon the failure of the State Board to address these and other original concerns of the IRRC, I ask that you vote to disapprove the final form Keystone Exam regulations.

Yours truly,

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