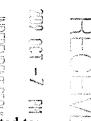
From:	Sharon Collopy [collopysharon@yahoo.com]
Sent:	Wednesday, October 07, 2009 12:24 PM
To:	IRRC
Subject:	Final Form Regulation 006-312, Keystone Exams

To the Members of the IRRC:



Please do not approve Final-Form Regulation 006-312 for reasons including, but not limited to:

- 1) Much of our supposed "need" for Keystone Exams comes from the statistics shown starting on page 13 of the 181 page pdf document. The number of 2008 PA high school graduates "not proficient pssa math and reading" is 52,219, or 40.1%. Is this number the total number of students not proficient in BOTH math and reading, or does this include those students who did not score proficient in one of the subjects? How many students of this total number are in special education programs?
- 2) Another statistic used to justify the Keystone Exams is one-in-three students in state-owned or community colleges require remedial English or Math. This statistic raises several questions. Is the number of students based solely on mandatory placement tests? Course enrollment numbers? What Math courses did the remedial student's high school offer? Most of the "reform" math programs do not prepare student for college math. Does the one-in-three number include a student who didn't take a math course senior year, took a year off to work, then went to a community college and needed review before taking a more advanced math course? Does it include students who take an easier course to help their GPAs? If one had Algebra in high school, is College Algebra considered a remedial course for that student?
- 3) Section III, Cost and Impact Analysis, states (17) "...there is no cost impact on individuals." Taxpayers ARE individuals and there is an impact on taxpayers.
- 4) Page 7 of the State Board of Education report says, "...the proposal has been endorsed by...thirty-five superintendents from across the commonwealth..." We have 501 school districts; 35 is less than 7% of 501.
- 5) Page 17 (page 144 of 181 in the pdf version) says, "Pennsylvania's academic standards are among the highest in the nation." Review the Fordham Foundation's report on PA standards or my testimony in December 2003 to the State Board of Education to learn the many flaws in our Reading and Math standards.
- 6) Page 26 (153 of 181 in the pdf version) says, "Only students enrolled in approved AP courses may take the AP exam for this course." Does this mean that only students enrolled in approved AP courses may substitute the AP test for a Keystone Exam? If so, it does not favor our gifted students. It is not a College Board requirement; anyone can take any AP test (assuming the student pays the fee).
- 7) Page 39 (166 of 181 pdf version) says, "In addition, the Board has begun the process of reviewing and updating the state academic standards." PA is also participating in the development of "Common Core Standards" on a national level. Why the rush to implement Keystone Exams when these two projects are underway but not completed? Why spend more money than necessary?
- 8) NCLB requires testing students in Reading and Math at least once in grades 10-12. Even if the 11th grade PSSA is eliminated, will all 11th graders be required to take the Keystone Exams in Math and Reading? What if a student took the Algebra 1 Keystone Exam in grade 7, 8, 9, or 10? Must he take it again? Would all students' grades on the Algebra 1 Keystone Exam in a given year count toward AYP despite the grade level at which the test was taken? PA officials expect federal approval to use the Keystone Exam in place of the PSSA, but will federal officials approve use of a test that a student already took?
- 9) How will mandatory Keystone Exams improve a district like mine, Central Bucks? They won't. Don't punish us. We already have good final exams in use and should not have to pay to have them validated.

How will the exams improve a district like Chester, where the report says 95% of the students in the Class of 2008 were not proficient on the PSSA? They won't, unless the students coming into high school are prepared to take Algebra and other high school level classes. Improving poor school districts must start at the elementary level and must include curricular changes like giving children direct, systematic phonics instruction and taking away their calculators.

What we need instead of Regulation 006-312 is a regulation that mandates the use of common sense in Harrisburg.

Sincerely,

Sharon L. Collopy 432 Wells Road Doylestown, PA 18901