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**From:** Detemple, Donald [donald.detemple@aiu3.net]  
**Sent:** Thursday, October 08, 2009 10:58 AM  
**To:** IRRC  
**Subject:** Keystone Exams  
**Attachments:** Keystone Exam formal letter 9 29 09.doc

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2009 OCT -8 AM 11:04  
INDEPENDENT REGULATORY  
REVENUE COMMISSION

Please see attached letter that was sent to you on 9/29/09.

Thank you!

Donald De Temple  
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SERVICES, RESOURCES, AND RESEARCH FOR EDUCATION

INDEPENDENT REGULATORY REVIEW COMMISSION

September 29, 2009

Independent Regulatory Review Commission  
333 Market Street – 14<sup>th</sup> floor  
Harrisburg, PA 17126-0333

Ladies and Gentlemen:

At the meeting of the Allegheny Intermediate Unit Board of Directors meeting on September 28, 2009, a vote was taken that resulted in a unanimous commitment to express our opposition to the proposed Keystone Exam regulation based upon the following:

1. Mandating that a school district must award a Zero (0) score which will be averaged as 1/3 of a course grade to students who fall below the basic level on an exam invalidates the final grade and does not represent an assigned grade correlated to actual performance.
2. Mandating a single test/final exam valued at 1/3 of a course grade for all students in a subject whether it be Honors or General, invalidates the grade assigned for specific coursework and the letter grade itself, which ultimately influences the final grade point average, which would be invalidated as well.
3. Permitting scores to be improved by successful completion of individual modules as remedial work invalidates the final course grades received.
4. Manipulating a student's course grade and therefore overall quality point average introduces ethical and statistical implications that cannot be justified.
5. New tests should only be required if they will replace the PSSA tests and not be additional required tests.
6. There is no conclusive research that evidences testing as a means to improve student achievement and thus add meaning to the high school diploma. In fact, research has proven that exams may increase student drop-out rates, particularly for minority children and those from low-income families.
7. Prior to implementing punitive measures to students who have not demonstrated proficiency on an exam or series of exams, the Commonwealth first has a responsibility to assure that ALL students have the opportunity to receive high quality instruction within a continuous rigorous curriculum, with equitable resources, in a disciplined, caring learning environment.
8. Utilizing monies in a financially constrained market to introduce new exams with flawed regulations (impossible to statistically convert an AP Score of 5,4,3,2,1 to a percent, invalidates QPAs etc.) would poorly reflect the credibility of the State Board and its charge to "review Commonwealth agency regulations to ensure they are in the public interest."

Based upon the above information and the interests of Schools in Allegheny County, AIU3, we urge the IRRC to disapprove the final form regulations.

We thank the members of the State Board for considering our request. Please know that representatives of the Allegheny Intermediate Unit are always willing to discuss our ideas and would welcome the opportunity to be part of the solution for improving our Commonwealth's schools. I may be reached at 412.394.5705 (office), 412.389.6631 (mobile), or [linda.hippert@aiu3.net](mailto:linda.hippert@aiu3.net).

Sincerely,

Dr. Linda B. Hippert

CC: Pennsylvania State Board of Education  
PA House and Senate Education Committee  
Allegheny County Legislators

**Linda B. Hippert, Ed.D., Executive Director**  
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