

Date Sept. 30, 2009

#2696

RECEIVED
2009 OCT -5 AM 9:13
INDEPENDENT REGULATORY
COMMISSION

SUBJECT: 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.
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 - 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.
 - g. Local assessment scoring.
 - h. Monitoring student proficiency for graduation.
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. The Board has failed to demonstrate why the department cannot use this information 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. 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.

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,

Name Liz Mailey 
Title _____
Street 396 Bair Rd.
City, State, Zip Berwyn, PA 19312
Phone 610-407-4597

2696

RECEIVED
2009 OCT -5 AM 9:
INTERNATIONAL
LAW COMMISSION

October 1, 2009

SUBJECT: 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.

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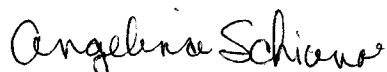
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Yours truly,



Angelina Schiano
411 Lantern Lane
Berwyn, PA 19312
610-725-1030

Date Sept. 30, 2009

2696

RECEIVED
2009 OCT -5 AM 9:13
REGULATORY
ADMINISTRATION

SUBJECT: Keystone Exams

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Yours truly,

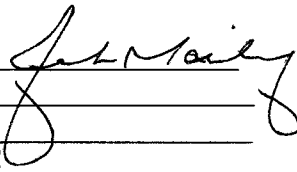
Name John Mailey

Title _____

Street 396 Bair Rd.

City, State, Zip Berwyn, PA 19312

Phone 610-407-4597



#2696

October 1, 2009

SUBJECT: Keystone Exams

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RECEIVED
2009 OCT - 5 AM 9:11
DEPARTMENT OF EDUCATION
EDUCATION

The final form regulations do not contain such an explanation.

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Yours truly,

Donna Schiano
411 Lantern Lane
Berwyn, PA 19312
610-725-1030

Date October 3, 2009

2696 RECEIVED

2009 OCT -5 AM 10:17

SUBJECT: Keystone Exams

INDEPENDENT REGULATORY
COMMISSION

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.

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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,

Name: Tamra Adams
Street: 715 Newtown Road
City, State, Zip: Berwyn, PA 19312
Phone 610-331-6849

#2696

RECEIVED

From: Linda Hood [rljmhood@msn.com]
Sent: Sunday, October 04, 2009 9:21 PM
To: IRRC
Subject: Keystone Exams

2009 OCT -5 AM 10:17

INDEPENDENT REGULATORY
GENERAL COMMISSION

SUBJECT: 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.

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Yours truly,

Richard and Linda Hood
517 Virginia Avenue
Paoli, PA 19301
610-695-9971

2696

RECEIVED

October 4, 2009

SUBJECT: Keystone Exams

2009 OCT -5 AM 10:16

Dear Members of the IRRC,

INDEPENDENT REGULATORY
COMMISSION

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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,

Lisa Davis
2 Salem Way
Malvern PA 19355
610.651.0121

2696

From: DKDK Goldstein [dkdkgoldstein@comcast.net]
Sent: Monday, October 05, 2009 8:21 AM
To: IRRC
Subject: Keystone Exams

RECEIVED
2009 OCT -5 AM 10:16
INDEPENDENT REGULATORY
MEMBER EXAMINATION

October 5, 2009

SUBJECT: Keystone Exams

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Yours truly,

Diane Goldstein
641 Llewelyn Road
Berwyn, PA 19312

2696

Rec'd
10/5/09

From: mrcw55@cs.com
Sent: Monday, October 05, 2009 4:38 PM
To: IRRC
Subject: Keystone Exams

October, 5, 2009

SUBJECT: 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.

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Yours truly,

Margaret Winters

503 Doral Circle

Berwyn, PA 19312

610-408-8831

#2696

McC'd 10/6/09

From: Jen Fryberger [jenfry27@comcast.net]
Sent: Monday, October 05, 2009 6:25 PM
To: IRRC
Subject: opposed to Keystone Exams

10/6/09

SUBJECT: 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.

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Yours truly,

Jennifer & Kevin Fryberger
860 S. Waterloo Rd.
Devon, PA 19333
610-964-1582

Jennifer Fryberger

Destination Consultant

Dwellworks

484-883-0438 cell

610-964-1582

jenfry27@comcast.net

www.dwellworks.com

#2696

Rec'd 10/6/09

From: Kristie Regan [regakr01@yahoo.com]
Sent: Monday, October 05, 2009 8:48 PM
To: IRRC
Subject: Keystone Exams Against
Attachments: letter_IRRC_aug26.doc

Please see attached letter regarding the implementation of Keystone exams. Thank you for your time and consideration.

Kristie McCourt

October 5, 2009

#2696
rec'd 10/6/09

SUBJECT: 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.

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Yours truly,

Kristie McCourt
339 W. 12th Ave.
Conshohocken PA 19428
610-389-0632

#2696

rec'd 10/6/09

From: Lisa Earle [learle@comcast.net]
Sent: Monday, October 05, 2009 8:56 PM
To: IRRC
Subject: KEYSTONE EXAMS

October 5, 2009

RE: 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.
 - 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.
 - g. Local assessment scoring.
 - h. Monitoring student proficiency for graduation.
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. The Board has failed to demonstrate why the department cannot use this information 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. 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.

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

Yours truly,

Lisa Earle & Thomas Earle, Esq.
104 Arlington Rd.
Paoli, PA 19301
610-407-0150

#2696

RECEIVED

2009 OCT -8 AM 7:51

INDEPENDENT REGULATORY
TEACHER TEAMWORK

From: Caroline Small [caroline.small@verizon.net]
Sent: Wednesday, October 07, 2009 8:05 PM
To: IRRC
Subject: Keystone Exams

Date_10-6-09

SUBJECT: 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.
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 - g. Local assessment scoring.
 - h. Monitoring student proficiency for graduation.
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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. 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.

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,

Name__Caroline Small
Street__859 Farragut Rd.
City, State, Zip_Berwyn, PA, 19312

#2696

From: JULIETTE HYSON [jjhyson@verizon.net]
Sent: Wednesday, October 07, 2009 9:43 PM
To: IRRC
Subject: Please Oppose the Keystone Exams

RECEIVED

2009 OCT -8 AM 7:46

INDEPENDENT REGULATORY
COMMISSION

October 7, 2009

SUBJECT: 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.
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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. 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.

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,
Juliette Hyson
1559 Russell Road
Paoli, PA 19301
610-407-0739

#2696

RECEIVED

2009 OCT -8 AM 9:57

INDEPENDENT REGULATORY
BOARD

From: Steven.Sheronas@chase.com
Sent: Thursday, October 08, 2009 9:39 AM
To: IRRC
Cc: Steven.Sheronas@chase.com
Subject: Keystone Exams

Date: 8 October 2009

SUBJECT: 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.
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"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. 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."

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

Yours truly,
Steven Sheronas, Registered Voter & School Board Canadidate for T/E School District
71 Homestead Rd
Strafford, PA 19087

This transmission may contain information that is privileged, confidential, legally privileged, and/or exempt from disclosure under applicable law. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution, or use of the information contained herein (including any reliance thereon) is **STRICTLY PROHIBITED**. Although this transmission and any attachments are believed to be free of any virus or other defect that might affect any computer system into which it is received and opened, it is the responsibility of the recipient to ensure that it is virus free and no responsibility is accepted by JPMorgan Chase & Co., its subsidiaries and affiliates, as applicable, for any loss or damage arising in any way from its use. If you received this transmission in error, please immediately contact the sender and destroy the material in its entirety, whether in electronic or hard copy format. Thank you.

#2696

From: ANTONIA and Andrew MULLEN [amullenfamily@verizon.net]
Sent: Friday, October 09, 2009 4:36 AM
To: IRRC
Subject: Keystone Exams- STOP state testing

October 9, 2009

SUBJECT: 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.
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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,
Toni Mullen
Concerned Parent
232 Upper Gulph Road
Radnor, PA 19087

RECEIVED
 2009 OCT -9 AM 7:19
 INDEPENDENT EDUCATION
 TRAINING CENTER

610-697-9865

2696

From: Janet Burt [janetburt@verizon.net]
Sent: Thursday, October 08, 2009 8:57 PM
To: IRRC
Subject: Keystone Exams

RECEIVED
OCT 09 10:01 AM 7:20
INDEPENDENT REGULATORY
COMMISSION

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.

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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,

Janet Burt
806 Newtown Road
Berwyn, PA 19312
610-644-3259

2696

Date 10/1/09

SUBJECT: Keystone Exams

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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.

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RECEIVED
OCT 1 2009
DEPARTMENT OF EDUCATION

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Yours truly,

Name Melody + Bill Pentz
Title Parentz
Street 20 Rebel Road
City, State, Zip Redno PA 19087
Phone 610-225-0544