

September 30, 2009

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Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101
irrc@irrc.state.pa.us

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INDEPENDENT REGULATORY
COMMISSION

RE: IRRC ISSUE # 2696
State Board of Education Final-Form Reg. No. 006-312
Chapter 4 Regulations – “Keystone Exams”

Dear Mr. Coccodrilli:

This letter is to oppose the State Board of Education (Board) Final-Form Regulation No. 006-312 which would revise the current Chapter 4 regulations and establish the “Keystone Exams”. Among a number of concerns about Regulation No. 006-312 are the following.

Provisions of Regulation No. 006-312 are more stringent than federal standards in that they require students to pass six high stakes exams in order to graduate. Federal standards do not endorse the withholding of the diploma based on high stakes tests.

As a result, the regulation will put Pennsylvania at a competitive disadvantage. An example is Maryland. Maryland requires students to take four high stakes tests as a step to graduation, however, that state reports that 30% of its students are allowed to graduate without passing those tests. The research is clear. High school graduates make substantially more money than people who leave high school with no diploma. They pay more taxes; participate more in the political process; and live longer, healthier lives.

As written, Final-Form Reg. No. 006-312 creates a threat to the health, safety and welfare of all citizens of the Commonwealth. In states where the high school diploma has been attached to student scores on high stakes tests, there has been an increase in the drop out rates as well as an increase in the incarceration rates (Pew Center: Report on the States 2008).

It is generally reported and rigorously documented that high school drop outs are financially immobilized with the annual earning capacity of an estimated \$19,000. They experience shorter lives than persons with a high school diploma due to the lack of health care. They live in poverty and cannot sustain themselves. They must access public assistance for food and shelter. They must depend on emergency room medical treatment. It costs tax payers billions of dollars when students are pushed out of high school with no diploma.

It is well documented that incarceration rates correlate highly with leaving school without a diploma. Health officials site prisons as breeding grounds for communicable diseases. Men especially are known to take such diseases as Hepatitis C and HIV from prison into the community.

Based upon the facts that Reg. No. 006-312 is more stringent than federal standards, that it puts Pennsylvania at a competitive disadvantage, and creates the potential for increased risks to society; please vote to disapprove the final form regulations.

Yours truly,

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FRIEND -
SENDING MORE POOR TALK OF
COLOR TO JAIL INSTEAD OF
COLLEGE WILL NOT HELP US.
A PROPOSAL WITH GOOD INTENT
BUT DRAGONIAN UNINTENDED
CONSEQUENCES IS NOT GROUNDED
IN THE WISDOM THAT WE
NEED TODAY.
I HOPE YOU WILL RECONSIDER
W. H. Sullivan