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**From:** Elliott Seif [elliottseif@verizon.net]  
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INDEPENDENT REGULATORY  
REVIEW COMMISSION

To whom it may concern:

I am attaching a letter sent to the Governor about the Keystone exams. This is in addition to testimony that was sent to you last week.

Yours truly,

Elliott Seif

October 10, 2009

Governor Edward G. Rendell  
225 Main Capitol Building  
Harrisburg, Pennsylvania 17120

Dear Governor Rendell,

I am a long time supporter of you and your agenda, ever since you were the mayor of Philadelphia.

As a lifelong educator, a former Professor of Education at Temple University and now an educational consultant, I cannot understand why you presently are doing everything you can to support the Keystone exams. I am bewildered by your highhanded tactics in support of the Chapter 4 regulations in the face of stiff opposition by so many lawmakers. While these exams may have some intrinsic appeal and on the surface seem like a good idea, in reality they have so many negatives that they deserve to die. Briefly, here are some of the major arguments against the test:

- ***They are not needed*** – Districts across the state already have final exams in place, and a better approach would be to help districts to strengthen their final exams, not replace them with State controlled exams. And you yourself have said that the PSSA exams indicate significant improvements over the last several years in student results. Why do we need a whole new system to replace one that is working and that can be adapted by making improvements?
- ***There is no guarantee that they will be useful and productive*** – a “one size fits all” test does not take into account the diversity of the curriculum and the students across the state. For example, how can one test in Literature take into account the many literary options that students might read in 501 school districts?
- ***There is no guarantee that Keystone exams will be of high quality and not have to be changed in the near future.*** Many of the State standards have been shown to be very weak and poorly developed, yet they have yet to be replaced with stronger ones. So what guarantee is there that the State tests might not also be weak and poorly developed? The State tests will likely be traditional, not a good choice of high stakes tests for determining successful skills for a 21<sup>st</sup> century world. The State has also signed on to the National Governor’s initiative to develop new Common Core standards and assessments – so it is possible that the new State tests will need to be replaced quite soon by those developed at a National level in the near future.
- ***The state cannot be trusted in the long run to implement and support high quality assessments.*** The newly proposed Chapter 4 regulations inexplicably weaken an important element of the current State assessment system – the graduation project. A clause has been added to the proposed regulations that allow students to fulfill this requirement by simply submitting an application for college! How does this help to

demonstrate that students can do research, make presentations, write coherent research papers and the like! The graduation project regulation should be strengthened, not weakened. This demonstrates that the State cannot be trusted to develop and maintain a high quality assessment system in the long run.

- ***Development and implementation will be expensive for the State and for Districts.*** The State has better things to do with hundreds of millions of dollars it will cost to develop and score the exams. Districts will have to fund the administration of *thirty* tests a year (ten tests three times a year) and find the money to tutor failing students in order for them to pass either all or part of the exams. Districts who feel they have stronger and better exams will have to pay to have their exams validated – by vendors selected by the State!!!
- ***The new Keystone exam requirements are likely to lead to more dropouts in the future.*** The State exams can only hurt graduation rates without leading to higher skills among students. There is no research that shows that students who do poorly on a single traditional exam necessarily do poorly in college or don't have significant skills. Some students who are talented in some areas may not do well in a single exam in one subject, yet they will be penalized and not be able to graduate with these high stakes exams in place.

In the face of all these (and other) arguments, I can only hope that you can be persuaded to change course and allow the proposed regulations to die!!! They do a great disservice to our schools, our children and our Districts. There are better and cheaper ways to institute higher standards and also provide the flexibility needed to meet the needs of students, such as working with Districts to strengthen final exams, using technology to encourage sharing among Districts, piloting some new model curriculum and assessments (with volunteer Districts) before disseminating them across the state, and delaying regulations to see how the National Common Core Standards play out.

Please – drop your support of these regulations and work with the legislature, the Department of Education, and the State Board to develop a new a different approach to strengthening education in the State. This is not the way to create an educational system that helps students to live and work in a 21<sup>st</sup> century world.

Respectfully,

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