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October 9, 2009

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Mr. Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14th Floor  
Harrisburg, PA 17101

INDEPENDENT REGULATORY  
REVIEW COMMISSION

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James P. Testerman, *President*  
Michael J. Crossey, *Vice President*  
W. Gerard Oleksiak, *Treasurer*  
John F. Springer, *Executive Director*

Dear Chairman Coccodrilli:

I am writing on behalf of the Pennsylvania State Education Association's (PSEA) 191,000 school employees regarding Regulation 6-312, which establishes new statewide high school graduation requirements.

Following the State Board of Education's adoption of proposed regulations last year, this association testified before the Senate Education Committee that "PSEA stands in opposition to this proposal or any other that seeks to implement yet another high stakes test for our students." Because of significant changes that have been made to the regulation, PSEA dropped its opposition.

The final regulation that the State Board adopted, and which has been submitted to IRRC, addresses many of the concerns raised by PSEA and other stakeholders, including:

- It does not require students to pass a single high-stakes test in order to graduate;
- It ensures that local assessments can be used instead of the state-developed Keystone Exams for graduation purposes;
- It enables students who do not test well to use multiple sources of evidence, including a portfolio approach, to demonstrate that they have the knowledge and skills to receive a diploma;
- It includes mechanisms to evaluate the effectiveness of the regulation, and includes educators and other education stakeholders in the implementation process;
- It includes appropriate safeguards for special education students and for other exigencies; and
- It reduces the implementation cost from earlier proposals.

In addition to these valuable changes, the final regulation preserves essential elements that PSEA has consistently supported, such as the development by the state of voluntary model curriculum and diagnostic tools that will be made available to schools and teachers.

**The PSEA Mission**

*To advocate for quality public education and our members through collective action.*

Affiliated with the National Education Association



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The State Board of Education actively consulted with PSEA and other stakeholder groups in order to address concerns that were raised throughout the regulatory process, and the final regulation succeeds in addressing some of the issues that caused PSEA to oppose the earlier proposed regulation.

Sincerely,

A handwritten signature in black ink, reading "James P. Testerman". The signature is written in a cursive style with a long horizontal flourish extending to the right.

James P. Testerman  
President