

2696

Joan 7

October 5, 2009

RECEIVED

SUBJECT: Keystone Exams

2009 OCT 13 AM 9: 43

Dear Members of the IRRC,

INDEPENDENT REGULATORY
REVIEW COMMISSION

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:

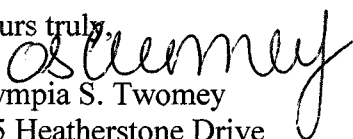
"Tracking the progress of each student in each of the subject matters, scheduling students to take a test or retake a test (or a module of a particular test) and providing remediation are all significant tasks that will require a large amount of a school district's resources. A detailed explanation of 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 address the original concerns by the IRRC, I ask that you vote to disapprove the final form regulations.

Yours truly,


Olympia S. Twomey
905 Heatherstone Drive
Berwyn, PA 19312
610-647-8277

2696

Date October 7, 2009

RECEIVED

2009 OCT 13 AM 9:44

SUBJECT: Keystone Exams

Dear Members of the IRRC,

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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 Leslie M. Dannin & Mark W. Krieg

Title Financial Advisor & Owner/Partner

Street 1015 Millbrook Road

City, State, Zip Berwyn, PA 19312

Phone 484-919-3425

Date October 12, 2009

RECEIVED

2009 OCT 13 AM 10:34

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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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,

Mary Janine Chiles
1023 Waterloo Rd
Berwyn PA 19312
610 644 0906
mjchiles@yahoo.com

2696

From: M.J. Chiles [mjchiles@yahoo.com]
Sent: Monday, October 12, 2009 10:49 AM
To: IRRC
Subject: Keystone exam
Attachments: letter_IRRC_aug26.doc

RECEIVED

2009 OCT 13 AM 10:34

INDEPENDENT REGULATORY
REVIEW COMMISSION

Please see attached letter
Thank you
MJ Chiles

2696

From: Rob Lake [rob.lake@comcast.net]
Sent: Monday, October 12, 2009 9:01 AM
To: IRRC
Subject: Keystone Exams

RECEIVED
2009 OCT 13 AM 10:34
INDEPENDENT REGULATORY
REVIEW COMMISSION

10/12/09

SUBJECT: Keystone Exams

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Yours truly,

Robert Lake
876 Saratoga Rd
Berwyn, Pa 19312
610-644-7393

2696

From: Carol Lake [carol.lake@comcast.net]
Sent: Monday, October 12, 2009 9:00 AM
To: IRRC
Subject: Keystone Exams

RECEIVED

2009 OCT 13 AM 10:34

INDEPENDENT REGULATORY
REVIEW COMMISSION

10/12/09

SUBJECT: Keystone Exams

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Yours truly,

Carol Lake
876 Saratoga Rd
Berwyn, Pa 19312
610-644-7393

2696

Date 10/09/09

SUBJECT: Keystone Exams

RECEIVED

2009 OCT 14 AM 9: 21

INDEPENDENT REGULATORY
COMMISSION

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Yours truly,

Name **Jill Graser** _____

Title _____

Street **215 s. Fairfield Rd** _____

City, State, Zip **Devon, Pa 19333** _____

Phone **610-225-0225** _____