

John G

2696

September 30, 2009

RECEIVED

Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101  
[irrc@irrc.state.pa.us](mailto:irrc@irrc.state.pa.us)

2009 OCT 14 AM 9:31

INDEPENDENT REGULATORY  
REVIEW 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,

Name MR Kenneth Tuttle MR. Kenneth Tuttle  
Title \_\_\_\_\_  
Street 1400 MACDADE BLVD  
City, State, Zip WOODLAW PA 19094  
Phone 610-656-9088

2696

September 30, 2009

RECEIVED

2009 OCT 14 AM 9:21

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101  
[irrc@irrc.state.pa.us](mailto:irrc@irrc.state.pa.us)

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,

Name Judith A. Dullap  
Title Taxpayer - Grandparent  
Street 8562 Gibson Place  
City, State, Zip Philadelphia, PA 19153  
Phone 215-365-0639

NAACP OCT. 5

2696

September 30, 2009

RECEIVED

Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101  
[irrc@irrc.state.pa.us](mailto:irrc@irrc.state.pa.us)

2009 OCT 14 AM 9:22

INDEPENDENT REGULATORY  
REVIEW 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,

Name Senest Dzeanckson Jr  
Title Rn  
Street 304 E. Jefferson St  
City, State, Zip Media, Pa. 19063  
Phone 610-565-6827

NAACP OCT. 5

2696

September 30, 2009

RECEIVED

2009 OCT 14 AM 9:22

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101  
[irrc@irrc.state.pa.us](mailto:irrc@irrc.state.pa.us)

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,  
Name John W. Stokes  
Title \_\_\_\_\_  
Street 503 Ridge LN  
City, State, Zip Media PA 19063  
Phone \_\_\_\_\_

2696

September 30, 2009

RECEIVED

2009 OCT 14 AM 9:22

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101  
[irrc@irrc.state.pa.us](mailto:irrc@irrc.state.pa.us)

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,

Name Bonnette Harris

Title \_\_\_\_\_

Street 3901 MARKET ST

City, State, Zip PHILA PA 19104

Phone \_\_\_\_\_

2696

September 30, 2009

RECEIVED

Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101  
[irrc@irrc.state.pa.us](mailto:irrc@irrc.state.pa.us)

2009 OCT 14 AM 9:23

INDEPENDENT REGULATORY  
REVIEW 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,

Name Lawton L. Washington  
Title Reverend  
Street 1630 N. 15<sup>th</sup> St  
City, State, Zip Phila, Pa, PA 19151-398  
Phone 215-877-7022

2696

September 30, 2009

RECEIVED

2009 OCT 14 AM 9:23

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101  
[irrc@irrc.state.pa.us](mailto:irrc@irrc.state.pa.us)

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,  
Name Sherley Robinson Allen  
Title Correction Educator  
Street 2417 Lindsay St  
City, State, Zip Chester PA 19013  
Phone 610-872-2776

2696

September 30, 2009

RECEIVED

Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101  
[irrc@irrc.state.pa.us](mailto:irrc@irrc.state.pa.us)

2009 OCT 14 AM 9:23  
INDEPENDENT REGULATORY  
REVIEW 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,  
Name Clair White  
Title Concerned Citizen  
Street 2410 Madison St  
City, State, Zip Cheser PA 19013-4618  
Phone 484-483-5238



2696

September 30, 2009

RECEIVED

Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101  
[irrc@irrc.state.pa.us](mailto:irrc@irrc.state.pa.us)

2009 OCT 14 AM 9:23

INDEPENDENT REGULATORY  
REVIEW 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 Varma Mitchell  
Name Varma Mitchell  
Title Teacher  
Street 403 Hastings Ave  
City, State, Zip Wallingford, PA 19086  
Phone 610-872-6615

2696

September 30, 2009

RECEIVED

2009 OCT 14 AM 9:25

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101  
[irrc@irrc.state.pa.us](mailto:irrc@irrc.state.pa.us)

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,

Name J. B. Flynn Ed.D.

Title Professor

Street 132 Fox Valley Rd

City, State, Zip Orlen Mills, PA 10342

Phone \_\_\_\_\_

2696

September 30, 2009

RECEIVED

Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101  
[irrc@irrc.state.pa.us](mailto:irrc@irrc.state.pa.us)

2009 OCT 14 AM 9:30

INDEPENDENT REGULATORY  
REVIEW 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,  
Name M. Cecelia Evans  
Title Educator  
Street 718 Beechwood Rd  
City, State, Zip Media, PA 19063  
Phone 610-565-4495

2696

September 30, 2009

RECEIVED

2009 OCT 14 AM 9:30

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101  
[irrc@irrc.state.pa.us](mailto:irrc@irrc.state.pa.us)

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,  
Name Donna Morrow  
Title \_\_\_\_\_  
Street 140 W 6th St  
City, State, Zip Media PA 19063  
Phone \_\_\_\_\_

2696

September 30, 2009

RECEIVED

2009 OCT 14 AM 9:30

INDEPENDENT REGULATORY  
COMMISSION

Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101  
[irrc@irrc.state.pa.us](mailto:irrc@irrc.state.pa.us)

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,  
Name Anna Fisher  
Title Retired Teacher  
Street 83 Palmers Mill Rd.  
City, State, Zip Media PA 19063  
Phone \_\_\_\_\_

2696

September 30, 2009

RECEIVED

OCT 14 AM 9:31

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101  
[irrc@irrc.state.pa.us](mailto:irrc@irrc.state.pa.us)

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,  
Name Maie King  
Title 819 N. Olive St  
Street Media PA 19063  
City, State, Zip  
Phone 610.565 4212