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Tom J

September 30, 2009

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2009 OCT 14 AM 9:22

INDEPENDENT REGULATORY
REVIEW COMMISSION

Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101
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”. Concerns about Regulation No. 006-312 include the failure of the State Board to clarify the cost of keystones, to address the adverse impact of the tests, or to demonstrate that Regulation No. 006-312 is reasonable and/ or necessary.

The cost of the final-form regulations to the state and to local education entities will adversely impact budgets. The actual cost of implementing these regulations is submerged. First, the mandated curriculum is not new. It is the course of study offered as college preparation at all high schools. The elements of Algebra, geometry, English, writing, and American government are constant. Curriculum exists for those courses. It is a waste of the tax payer’s money to spend hundreds of millions of dollars for materials that already exists. Curriculum in the sciences is in constant flux as new discoveries are made. Districts address these changes through local curriculum committee choices.

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The alternative to Keystone Exams is the continued use of the current PSSA, which, according to the Department of Education is functioning successfully. Districts are presently organized to execute this assessment which satisfies the NCLB mandate for testing. Systems to monitor students and provide remediation are in place. There is no reason to dismiss the current system and spend un-estimated hundreds of millions of dollars to replace it.

Moreover, there is the adverse impact of calculating an “end of course test” as 33.3% of a student’s final grade in a mandated course. The negative consequence of this is immeasurable. At the least, using this formula will lower the Quality Point Average of many students, jeopardizing their access to scholarship funds. This can cause great hardship for many families. As worst, this plan will result in pushing some young Pennsylvanians out of high school without a diploma. The drop out rate of high school students is a national crisis. The Keystone Exams plan will exacerbate that issue in our own state and cost billions in basic needs assistance such as rent, health insurance and food subsidies.

Final-Form Regulation No. 006-312 is unreasonable and unnecessary. All research in education reform informs us that the best use of education spending is for early childhood education, for small class sizes, and for well trained educators. End of high school testing does nothing to improve education. As Pennsylvanians, we want our taxes used to do what works to educate children. Tests do not educate.

Based upon the failure of the State Board to clarify its costs, to address the adverse impact of the tests, or to demonstrate that Regulation No. 006-312 is reasonable and/ or necessary, I ask that you vote to disapprove the final form regulations.

Yours truly,

Name Ann T. Geers

Title _____

Address 411 N Meddletown Rd - Apt A208

City, State, Zip Media PA 19063

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333 Market Street, 14th Floor
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Yours truly
Name Shirley Robinson Allen
Title Adult Educator
Address 2417 Lindsaye
City, State, Zip Chester, PA 19013

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Yours truly, VARMA MITCHELL
Name
Title TEACHER
Address 403 Hastings Ave
City, State, Zip WALLINGFORD, PA 19086

2644

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Yours truly,

Name Cyndi Gutierrez
Title MS.
Address 118 ELFRETH'S Alley
City, State, Zip Phila., PA 19106-2006

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Yours truly,

Name Smathna Reel
Title _____
Address 912 Flora Lane
City, State, Zip Boothwyn, PA 19061

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Independent Regulatory Review Commission
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Yours truly
Name Donna Morrow
Title _____
Address 140 W. 6th St
City, State, Zip Media PA 19063

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Yours truly,

Name Bob McMahon
Title Mayor Media Pa
Address 10 Oakmont Place
City, State, Zip Media Pa 19063

Bob McMahon

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Yours truly,

Name Junnie Cross 

Title Ms.

Address 1303 S. Broad St.

City, State, Zip Philadelphia, PA 19147

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Independent Regulatory Review Commission
333 Market Street, 14th Floor
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Yours truly, Lisa Murphy
Name Lisa Murphy
Title Mother
Address 4409 Chandler Dr
City, State, Zip Brookhaven PA 19015