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Marion C. Alexander
16 Wagner Street
Hummelstown, PA 17036
(717) 566-3029

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INDEPENDENT REGULATORY
REVIEW COMMISSION

October 8, 2009

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

RE: Final-Form Regulation 6-312 – Academic Standards and Assessment

Dear Chairman Coccodrilli:

I understand the Independent Regulatory Review Commission will be holding a meeting on October 22nd and will consider final form regulations 6-312 relating to academic standards and assessment. I would respectfully urge the Commission to approve the regulations. The final-rulemaking would guarantee that all high school graduates, regardless of where they attend school, have achieved the state academic standards and have the educational foundation required to successfully transition to postsecondary education and 21st century occupations. Additionally, the regulations will provide some much needed tools for educators to improve curriculum and diagnose when students have academic difficulties that may impede their future success. These regulations are absolutely necessary if Pennsylvania wants to continue to make strides in the educational progress of our students.

While some critics either opposed or questioned the need for these regulations, the data doesn't lie – Pennsylvania has a problem. There is clearly a disconnect between what is expected of youth when they enter postsecondary institutions or careers and what is required of them to graduate from high school. Firstly, too many high school graduates are unprepared to go on to some form of higher education without having to take remedial classes. The Pennsylvania Department of Education (PDE) reports that 20,000 students who enrolled in community college or state-owned universities last year had to take remedial classes before they could take credit-bearing courses. This cost students, their families and taxpayers over \$26 million. Considering the economic difficulties that Pennsylvanians are facing, it is simply unacceptable for students, families, and taxpayers to have to pay *twice* for something that students were supposed to know and understand before they graduated from high school.

Secondly, too many students graduate from Pennsylvania's high school without achieving proficiency on the 11th grade PSSA exam. In fact, 455 of school districts graduated at least 20 percent or more students than were proficient on the PSSA exam in 2008. And while I acknowledge that the 11th grade PSSA is not the best form of assessment, hence the need for this

final rule-making, it should make us pause and consider why students cannot achieve proficiency on the 11th grade PSSA exam. Despite concerns about the exam, the PSSA is a validated measure of Pennsylvania's academic standards.

Thirdly, a study of school districts' local assessments shows that the vast majority do not meet the needs of Pennsylvania's students. PDE commissioned Penn State University's College of Education to do a study of school districts' local assessments. The results were astonishing even to those who already agreed that a problem existed. According to the study, only 18 school districts appropriately measure proficiency in math and reading for their students and use these results accordingly to award diplomas. The totality of this data demonstrates the need for these regulations.

This proposal will also provide Pennsylvania's students with the supports and tools needed by educators to further their students' academic process. Educators will have access to voluntary model core curricula that is aligned to our academic standards. Teachers will be given diagnostic tools that will help identify struggling students (no later than sixth grade). Students will receive supplemental instruction (also called remediation) if they can't reach proficiency on a local assessment or in the courses where there are Keystone Exams. The inclusion of these provisions recognizes that we cannot simply establish higher standards for accountability and ignore the needs of educators who are responsible for helping students reach proficiency and the needs of students, who will sometimes need additional help to be successful. We have to provide the supports for fostering students' academic growth, too.

Further, this compromise proposal responds to the concerns of critics who were concerned that students would be denied a diploma if they failed a single test. School districts will be allowed to use their local assessments, provided they are independently validated. And if districts choose to use Keystone Exams, proficiency will be measured on how they perform in the entire course, including the Keystone Exam – not solely the exam.

If we want this Commonwealth to not only recover from the economic crisis, but experience real economic growth, than we must be ensure that the children educated in classrooms today can handle the challenges of tomorrow. Our current system for determining graduation does not offer our children and youth that guarantee, but the proposal contained in final-rulemaking 6-312 would. Please support the final-rulemaking.

Thank you for your consideration of my comments.

Sincerely,

A handwritten signature in black ink that reads "Marion C. Alexander". The signature is written in a cursive style with a large initial "M" and "A".

Marion C. Alexander

cc: The Honorable Jeffrey Piccola