



educational excellence through leadership, partnership, and Innovation

October 19, 2009

Fiona Wilmarth, Director of Regulatory Review
 Pennsylvania Independent Regulatory Review Commission
 333 Market St, 14th Floor
 Harrisburg, PA 17101

INDEPENDENT REGULATORY
 REVIEW COMMISSION

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Dear Members of the Independent Regulatory Review Commission,

I am writing today on behalf of our district superintendents and the students they serve regarding the Keystone Exam regulations under review. I hope you will consider the consensus thinking of the school leaders from our region whose names and districts appear at the end of this letter. We are fully engaged in a regional effort to redesign our high schools. We anticipate and welcome changes in high school graduation requirements at the state level which will reinforce the rigor we believe necessary for our graduates to succeed.

Please know that our districts support challenging academic standards for graduation and recognize the value of common, end-of-course tests developed at the state level. We believe that the previous proposal to require students to pass six of ten exams to qualify for a high school diploma was a reasonable expectation, provided a consideration of career and technical preparation was afforded to students completing a vocational program. We also strongly support the elimination of the 11th grade PSSA, a test which currently requires suspension of most classes in a high school for up to two weeks, and endorse its replacement with PDE-supplied standard final exams.

However, the current Keystone Exam proposal currently under consideration includes two provisions which are, in our estimation, educationally inappropriate and likely to result in counterproductive and unintended consequences. These two provisions are in boldface below, taken directly from the proposed language:

Keystone exams will be scored on a 100 point scale. When used to determine proficiency to meet high school graduation requirements they shall count for one-third of the final course grade. Students must score advanced, proficient or basic on a Keystone Exam to receive points from the exam towards their final course grade.

In regard to the second boldface, this provision requires that a score of zero (0) be assigned to a student whose efforts yield a performance-level score of Below Basic. Specifically, here are the primary problems with this provision:

- 1) If students demonstrate knowledge or skills on a Keystone Exam, but fail to score above the Below Basic level, they are denied credit for any of that knowledge or those skills they have acquired. This is educationally unsound and unnecessarily punitive. If the

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test is scaled to 100 points, students should be credited with whatever achievement they can demonstrate.

- 2) Those responsible for setting the performance level cut scores may be influenced by this punitive provision and feel compelled to lower the threshold when assigning score ranges for the four performance levels. This would be counterproductive, in that the goal of the Keystone Exams is to raise the bar for high school diplomas, not "dumb down" the expectations.

In regard to the first boldface - that the Keystone Exam score count for one-third of the course grade - the superintendents share several concerns:

- 1) As stated previously, we have no objection to stringent accountability measures to maintain the integrity of the diploma. However, if one-third of the grade is based on a test for which a score of zero may be assigned, even when the student demonstrates a yet-to-be-determined but otherwise inadequate percentage of the knowledge and skills associated with the course, we are likely to see the unintended consequence of disengagement by the students.
- 2) More and more of our schools are moving toward a mastery grading system, one in which progress toward clearly defined goals for achieving specific course concepts, content and skills is measured and reported, but not necessarily calculated as a percentage or letter grade. How and when will the Keystone Exam grades be reported, and how will they be incorporated into the multitude of grading systems and grading scales already in place within our high schools?

If this provision is enacted, it would follow that the state will then have to dictate the grading practices of the high schools to assure equitable influence of the Keystone Exam scores. Furthermore, if *non-public* school students are not subject to the same requirements, then the interference of the state on local grading systems in public schools may put public school students at a disadvantage when competing for regional or higher education scholarships based on grade-point average.

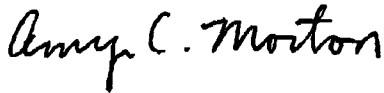
While some consistency may be welcomed in this regard, the history of the Commonwealth's commitment to local control would indicate this is not a prudent selection for intrusion when a simpler and equally effective solution would be to revert back to the original proposal of requiring a specific number of exams be passed without interference in the local grading system.

- 3) If, as indicated in the proposed regulations, Advanced Placement (AP) and International Baccalaureate test scores may replace Keystone Exams, how will the schools use these to account for one third of a final course grade? AP tests are only given once per year in May, and the scores are not available until July. What is the conversion of AP scores, which are based on a scale of 1-5? And are schools to issue "incomplete" grades for its highest achieving students?

While there are other less significant objections to the current proposed language regarding high school requirements, the two cited above are of the greatest concern. We urge the IRRC to reject the current regulatory language and request that the State Board of Education reconsider previous proposals which do require students to pass a minimum number of tests in core subject areas. Requiring passing scores on a minimum number of state-provided final exams, including vocational assessments where applicable, affords the state the ability to maintain a higher standard for "pass" scores, eliminates undue influence on local grading systems, reduces complications associated with the use of AP tests, and yet maintains the integrity of the diploma. Such an approach would increase the likelihood that our PA high school graduates are indeed college and career ready, and would do so without experiencing the otherwise unavoidable negative consequences described above.

Thank you for your consideration of these concerns as you deliberate the merits of the regulatory language affecting students in Pennsylvania's public schools.

Respectfully,



Amy C. Morton
Executive Director

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Big Spring School District

Connie R. Kindler, Superintendent
Camp Hill School District

Mary Kay Durham, Superintendent
Carlisle Area School District

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