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CARLISLE AREA SCHOOL DISTRICT

623 W. Penn Street
Carlisle, Pennsylvania 17013
Telephone: 717-240-6800
Mary Kay Durham, Superintendent

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SUPERINTENDENT

October 16, 2009

Mr. Arthur Coccodrilli, Chair
Independent Regulatory Review Commission
333 Market St, 14th Floor
Harrisburg PA 17101

Re: Final Form Regulation 6-312, Academic Standards and Assessment

Dear Mr. Coccodrilli:

This letter concerns the proposed final form regulations which the State Board of Education transmitted to the IRRC on September 21, 2009, as referenced above.

In June of 2008 and again in June of 2009, the board of directors of the Carlisle Area School District unanimously expressed our opposition to the proposed graduation competency assessments, now known as the Keystone exams. Copies of the two letters, the first to the State Board of Education and the second to members of the General Assembly and Secretary of Education Gerald Zahorchak, are attached.

The following points summarize the problems raised in the original letters.

Student Achievement: Any new testing program has curricular costs because students lose time preparing for tests and taking tests that otherwise could be used learning additional content. This is particularly harmful for students who struggle to learn and who are most in need of additional learning time. These often are the same students for whom difficulty in taking or passing standardized tests translates into dropping out of school altogether. Vocational students, who spend half of their days learning a trade, also are disadvantaged by high-stakes academic testing.

Assessments: Student achievement in Pennsylvania is already well-measured by tests that align with the state's academic standards. There is no assurance, nor even an assertion, that the Keystone exams also will be constructed consistent with the state's academic standards. If they are not, school districts will face significant and expensive repercussions for a curriculum developed to accommodate the existing state standards and resulting PSSA. If there is a need for a more rigorous PSSA test, that is preferable to an altogether new approach to assessment.

While they have value in measuring systemic performance, standardized tests are not the best way to measure student progress and achievement in time for teachers to take whatever

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action an assessment suggests may be needed. Spending more time on standardized tests means having less time to spend on individualized assessment tools such as student portfolios, presentations and other demonstrations of actual skill and knowledge.

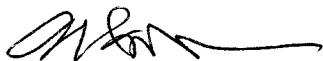
Administration: Preparing to give these tests to students three times a year imposes significant administrative burdens and financial costs. Costs include revising curriculum, professional development, administering the test and providing any needed remediation. Using the local option imposes the costs of test development and validation. To date, there is no indication that the Commonwealth will cover these costs imposed on local taxpayers.

Local/State/Federal Relations:

We do not believe that this is the most prudent use of funds that are, and will be for the next several years, extremely limited. It is far more important for the Commonwealth to fulfill its current obligations to students and schools than to incur new ones. We do not believe the Commonwealth will invest more than \$200 million on a program that will be optional. We believe it will become mandatory. Finally, until Congress re-authorizes No Child Left Behind, and until there is a consensus that a statewide curriculum is wise, it is premature to begin a project of this magnitude.

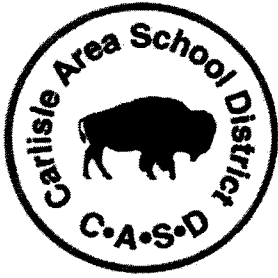
We therefore urge you to disapprove the proposed regulations. Thank you for your consideration.

Sincerely,



Nancy Fishman, President
Board of School Directors

Attachments



CARLISLE AREA SCHOOL DISTRICT

623 W. Penn Street
Carlisle, Pennsylvania 17013
Telephone: 717-240-6800
Mary Kay Durham, Superintendent

June 12, 2008

Mr. Jim Buckheit, Executive Director
PA State Board of Education
333 Market Street
Harrisburg, PA 17126-0333

Dear Mr. Buckheit,

RE: Academic Standards and Assessments, IRRC#2696 and Regulation #:6-312

The Carlisle Area School District Board of Directors has carefully reviewed the proposed rulemaking from the State Board of Education and information from Secretary Gerald Zahorchak regarding the Graduation Competency Assessments. Based on our analysis with input from our administration the Board of Directors respectfully request that the State Board of Education and the Pennsylvania General Assembly reject the *current* proposed Graduation Competency Assessment regulations for the following reasons:

Adoption of the GCAs will decrease the amount of time necessary for instruction. On an average the administration of the reading, writing, math and science PSSA decreases instruction by at least fifteen hours at the eleventh grade where the tests are administered. Students who take the ten proposed GCAs will lose a minimum of 10 hours instructional time. If the time for taking both the GCA and PSSA are combined, the typical student will miss at least five days of instruction. For the student who does not pass the GCA the first time and needs to continue taking it, there will be loss of additional instructional time. Students who repeat taking the GCA are the very students who *need* the instructional time. Districts, in an attempt, to help these students are likely to place the students in homogenous classrooms that use curriculum designed to enable students to "pass the test" and the focus will be on remediation.

GCAs will increase paper and pencil *standardized* testing. Research questions the assumption that student learning is appropriately measured by paper-and-pencil tests which is typically the format for standardized tests. In fact, "according to the New York Times, 'the number of colleges and universities where such (standardized) tests are now optional – mostly small liberal-arts colleges – has been growing steadily as more institutions have become concerned about the validity of standardized tests in predicting academic success, and the degree to which test performance correlates with household income, parental education and race... The most important criteria for admission will be high school curriculum and classroom performance, writing ability, extracurricular activities and evidence of character and talent.' This type of testing severely limits the scope and ability to assess higher level learning while often negatively impacting a student's achievement." Formative assessments have been proven to measure and increase learning as they occur on an ongoing basis, daily, weekly or monthly. Formative assessments are enhanced when they require application of knowledge in authentic and meaningful ways such as in presentations and projects. Although the GCA proposal permits schools to use a local assessment option, it establishes numerous limitations, including the elimination of the ability to use various assessment strategies now available to local entities and requires local tests to be closely modeled to the GCAs.

In states that administer high stakes exit tests the dropout rates have increased. A student dropping out will be equivalent to the state denying a student a high school diploma via the PSSA or the GCA and both will have serious long-term negative effects on that student's life, as well as implications on the individual and society. There are costs, both human and financial, of putting students out on the street who are willing to come to school, want to come to school, and want to do their work, but know they are not going to do well on paper-and-pencil standardized tests. Carlisle Area School District is fortunate to have a diverse population of students in terms of minority and English Language Learners. Based on results from previous PSSA tests and other forms of standardized tests it can be assumed that both minority and ELL students will be adversely affected by graduation competency assessments.

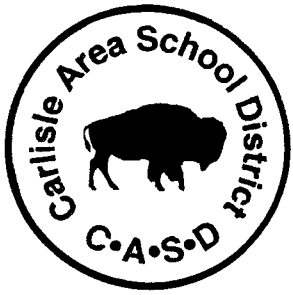
The success of the career and technical education students would be potentially impacted by the GCA proposal as students in career and technical centers spend much of their time learning information that will prepare them for specific professions. Carlisle High School is a comprehensive high school that supports five vocational programs. Nearly fifty percent of a vocational student's day is spent in classrooms learning a specific trade.

The cost to develop, distribute and administer the GCAs has yet to be fully determined and realized. Governor Rendell in his 2008-09 budget proposes spending \$15 million for the development of *three* of the ten required GCAs. Obviously the costs will increase significantly to develop and implement the additional seven tests. Further, since GCAs must be administered at least three times per year it will be necessary to develop three different versions of each test. In addition, school districts will absorb many new costs related to revising curriculum, professional development, test preparation and administration, remediation, and test development and validation should they choose the local assessment route. Given the state's funding shortfall and the Act 1 limitations on tax increases, school districts have limited ability to fund these potential new costs.

In closing, we believe that it is important for our students to achieve at higher levels, demonstrate knowledge that will equip them for success in the 21st century and make them contributing members of society. But, it is our belief that if the State Board of Education and the Pennsylvania General Assembly are concerned about measurable student achievement they need to consider the impact the current proposed regulations will have on instructional time, the cost and design of the test and the effect it will have on all students, particularly special education, ELL, minority, and career and technical students.

Sincerely,

Dr. Fred Baldwin
President, Board of Directors



CARLISLE AREA SCHOOL DISTRICT

623 W. Penn Street
Carlisle, Pennsylvania 17013
Telephone: 717-240-6800
Mary Kay Durham, Superintendent

June 18, 2009

Honorable Will Gabig
410 Irvis Office Building
PO Box 201199
Harrisburg, PA 17120-2199

Dear Representative Gabig:

Recently Secretary of Education Zahorchak asked school boards to contact their legislators with regard to the proposed Keystone Exams.

Unanimously, the Board of Directors of the Carlisle Area School District opposes the contract between the Commonwealth and Data Recognition Corporation (DRC) to develop the proposed exams along with extensive related work. Our reasons follow:

1. The scope of the DRC contract reflects decisions that we believe are premature and that may be unnecessary. There has not been sufficient opportunity for appropriate and thorough debate among the Commonwealth's school districts, which should occur before embarking on such a project.
2. We do not believe that this is the most prudent use of funds that are, and will be for the next several years, extremely limited. It is far more important for the Commonwealth to fulfill its current obligations to students and schools than to adopt new ones.
3. We do not believe the Commonwealth will invest more than \$200 million – to start – on a program that will be optional. We believe it will become mandatory, and the history of the Commonwealth's relationship with school districts leads us to no other conclusion.
4. We do not believe the Commonwealth will provide funding for school districts to re-align their curriculum to be consistent with the statewide curriculum that will form the basis for the Keystone Exams.
5. Until Congress re-authorizes No Child Left Behind, and until there is a consensus that a statewide curriculum is wise, it is premature to begin a project of this magnitude.

We urge you, therefore, to support any and all efforts to rescind the DRC contract. Thank you for your consideration.

Sincerely,

Thomas D. Longenecker
Board Secretary