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**Southeastern
Pennsylvania
School
Districts'
Education
Coalition**

Established in 2006, the Southeastern Pennsylvania School Districts' Education Coalition (SPSDEC) is a grass roots public education advocacy group comprised of more than 116 school board members and administrators from 60 districts in Allegheny, Berks, Bucks, Chester, Delaware, Lancaster, Lehigh, Montgomery and Washington Counties. Our mission is to evaluate, discuss and inform our boards, district constituents and legislators on legislative issues of common interest.

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October 18, 2009

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

**RE: Keystone Exams IRRC #2696:
Need for regulation
Absence of supporting data**

Dear Chairman Coccodrilli,

From the existing PSSA exams, we already know with great specificity which school districts, which schools and which students are not performing at an acceptable level relative to Pennsylvania's state academic standards. We already know the performance of each student in specific content areas relative to the state academic standards. Why do we need another set of assessments? What will the value-add be in return for giving up more classroom instructional time, more administrative time and spending more taxpayer dollars?

We have numerous high performing school districts throughout the state. Why do they need these exams and how will this proposal help them? At best, for them it will be an instructional and administrative nuisance. The Department of Education has identified a small group of school districts whose local assessments have been evaluated and deemed valid. Why not make those validated assessments available to other districts?

How will this proposal help those districts that are chronically struggling? A short but poignant comment submitted to the IRRC website from a Philadelphia resident reads, "The money for these (Keystone exams) needs to be spent on interventions to help students that are failing, not used to hound them out of schools that have failed them."

There are thirty (out of 500) superintendents who support the proposed Keystone Exams. I am not aware of any reason why they could not voluntarily begin implementing a program of not graduating students who are not proficient on the PSSAs right now, without forcing the other 470 districts to do the same. If the Keystone Exam proposal were truly "voluntary", as the administration suggests, then we would not even be discussing a regulatory change.

I do not share the view that the "Torsella compromise" will promote greater accountability because there is simply no data to support that claim. The administration has had almost two years to produce such supporting data.

However, and most importantly, I do not believe that the proposed regulations will benefit our students or our taxpayers. Our critical resources of instructional time and taxpayer dollars will be grossly misallocated should #6-312 become law.

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INDEPENDENT REGULATORY
REVIEW COMMISSION

On the Springfield Township School District website there is the following quote:

"Bring us your children in Kindergarten. Let us work with them through all of elementary school. Make sure they get plenty of rest, exercise and good nutrition at home. Help them with their homework. Read to them. Let them see you read. If all of that happens...I guarantee your child will read on grade level by the end of 4th grade." – J. Capolupo, Superintendent of Schools

We know (and the research bears out) that if our kids are not reading at grade level by 3rd grade they will probably be scoring below basic eight years later. If they can't read they are not going to be successful at math problems either.

Contrast Superintendent Capolupo's quote with the experience of a good friend of mine who is a first year teacher in Philadelphia this year. Almost all of her 6th grade class is reading at 2nd grade level. Through the first several weeks of school she had no curriculum or textbooks for two of the major subjects. I hope you can understand why the level of concern exists that we are considering spending \$200+ million to feel good about accountability that has no basis in research.

A study published in the May 2009 issue of Phi Delta Kappan by John Robert Warren and Eric Grodsky of the University of Minnesota states that **"after evaluating the effects of high school exit exams on a variety of student outcomes using nationally representative data spanning nearly 30 years, we conclude that exit exams hurt students who fail them without benefiting students who pass them – or the taxpayers who pay for developing, implementing and scoring them."**

They reported that they **"found no evidence for any effect of exit exams (minimum competency or higher competency) on reading or math achievement at the mean or at any of several cut-points of the achievement distribution."** Their article asks, **"How is it that 23 states (and counting) have implemented policies that appear to do such harm without doing any good?"**

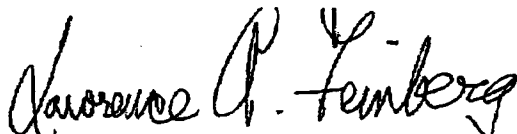
They further reported that **"Young high school graduates who obtained their diplomas in exit exam states fared no better in the labor market than their peers who obtained their diplomas in other states."**

According to Daniel Koretz, a professor at Harvard University's Graduate School of Education being quoted in a May 25th, 2009 article in the Washington Post, **"We have very little hard, empirical evidence about the effects of these test-based accountability programs, all of them, on student learning."** Koretz further stated, **"There is absolutely no expectation in education policy right now that these reforms would be evaluated. It's almost as if drug manufacturers were able to dream up drugs and go ahead with them without any testing."**

At a recent meeting held at the Rand Corporation, a Rand researcher reported that **"there is little research to support exit exams, but what does exist shows an increased dropout rate and very little, if any increase in student achievement."**

After almost two years of discussion, what has the administration done to justify the need for these regulatory changes, to justify the need to spend \$210 million and divert the focus of classroom time as a statewide mandate instead of directing attention to the districts that need help?

Sincerely,



Lawrence A. Feinberg, SPSDEC Co-Chairman