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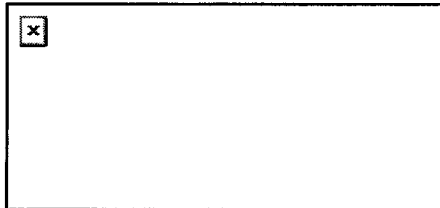
**From:** David Patti [dpatti@pabusinesscouncil.org]  
**Sent:** Sunday, October 18, 2009 9:28 PM  
**To:** IRRC  
**Subject:** Keystone Exams, Regulation Number 2692  
**Attachments:** PBC2IRRC-GraduationRequirements.pdf

**Importance:** High

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INDEPENDENT REGULATORY  
REVIEW COMMISSION



## Pennsylvania Business Council

116 Pine Street, Suite 201  
Harrisburg, Pennsylvania 17101  
Phone 717-238-1764  
[www.pabusinesscouncil.org](http://www.pabusinesscouncil.org)

October 18, 2009

**Keystone Exams, Regulation Number 2692**

Independent Regulatory Review Commission  
**Attn:** Chairman Arthur Coccodrilli  
333 Market Street  
Harrisburg, Pennsylvania 17101

Dear Chairman Coccodrilli:

I am writing on behalf of the nearly 50 CEOs and senior executives who make up the Policy Roundtable of the Pennsylvania Business Council to convey our strong support for the State Board of Education's proposed rulemaking for High School Graduation Requirements (regulation number 2692) and to urge the Commission to approve the rulemaking for final publication and promulgation.

The Pennsylvania Business Council envisions a Commonwealth in which residents enjoy a very high quality of life in sustainable communities, where those who are seeking employment find high quality jobs with good compensation, and where those who invest their capital and hard work can grow firms that flourish and are profitable. The PBC Policy Roundtable, like its national counterpart in Washington, is a forum in which CEOs meet on a peer-to-peer basis to formulate public policy proposals to the most pressing issues of competitiveness. The Policy Roundtable provides senior managers the opportunity to interact extensively with policymakers, policy experts, media, and other stakeholders; participate in policy evaluation; vote on long-term public policy strategy; and guide policy education/advocacy efforts.

The PBC Policy Roundtable has been engaged in the development of this proposed rulemaking for well over a year. In the spring of 2009, the Roundtable directed its affiliated PBC Education Foundation to conduct non-partisan survey research into the views and perceptions of Pennsylvania business owners and managers regarding this subject. That research based on interviews with 400 Pennsylvania businesspersons found:

- Only 7 percent of interviewees were "very confident" that high school students are graduating with the necessary knowledge and skills.

- Only 53 percent of interviewees thought “a high school diploma is a good indicator of a candidate's competency, basic skills and knowledge.”
- 80 percent of interviews were “strongly” or “somewhat” supportive of “new guidelines that would require high school students to meet certain statewide requirements to prove they are proficient in basic skills by passing a series of common final exams in reading, math, science, writing and social studies in order to graduate.”

The PBC Policy Roundtable is well aware of the questions and controversies that have arisen through the formulation and debate of this proposed rulemaking. The PBC Policy Roundtable has been consistently impressed by the willingness of the State Board of Education to gather input and learn from constructive criticism. The PBC Policy Roundtable believes that many very positive accommodations and modifications have been made to the proposed rulemaking.

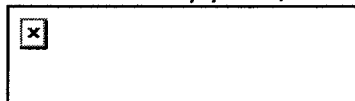
The PBC Policy Roundtable acknowledges that there are still implementation issues to be addressed as the rule and the programs it anticipates are developed and readied for public use. The members and staff of PBC, the PBC Policy Roundtable and the PBC Education Foundation stand ready to partner with State board of Education members, Department of Education personnel, teachers, parents and other interest groups to make this rule and the ensuing programs a complete success.

Continuing discussions regarding implementation issues, however important, should not impede consideration of the proposed rulemaking and final promulgation.

At an October 15, 2009 meeting in Pittsburgh, the Policy Roundtable voted unanimously on a formal position of support for the proposed rulemaking in its current form and instructed me to communicate that support to the Commission.

We believe this regulation is in the best interests of a more competitive Pennsylvania, a more prepared workforce, and – most importantly – the education our young citizens. We urge the Commission to approve the proposed rulemaking for final publication.

Sincerely yours,



DAVID W. PATTI  
President & CEO



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Sincerely yours,

A handwritten signature in black ink that reads "Dave Patti". The signature is written in a cursive, flowing style.

DAVID W. PATTI  
President & CEO