



PENNSYLVANIA

Association of Career & Technical Administrators

www.pacareertech.org

RECEIVED

2009 OCT 19 AM 8:16

INDEPENDENT REGULATORY REVIEW COMMISSION

October 18, 2009

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

Dear Chairman Coccodrilli:

The Pennsylvania Association of Career and Technical Administrators (PACTA) would like to take this opportunity to comment on final form regulation #6-312 – Academic Standards and Assessment submitted by the State Board of Education. PACTA has serious concerns with four facets of the Keystone Exams as proposed in these regulations.

1. The exams will count for 33% of the grade for a course. PACTA believes the percentage is too high and that the exams should count for no more that 20% of a course grade.
2. The regulations award no points on the exams for students scoring below basic. PACTA believes that this is unfair to students and that students should receive credit for scores that they earn.
3. PACTA believes that the provisions related to the development of alternative assessments will result in a financial burden that will be difficult for many districts to meet.
4. The regulations direct the department and the State Assessment Validation Advisory Committee to investigate the use of a certificate based on industry approved standards and performance on a NOCTI as an alternative pathway to graduation for career and technical students. PACTA believes that such a study is not necessary and that this alternative pathway should be implemented when the regulations are implemented. The State Board has already recognized the value of industry standards and NOCTI tests by requiring them through regulation.

PACTA, therefore, is unable to support the final form regulations. Thank you for consideration of our comments.

Sincerely,

Jacqueline L. Cullen
Executive Director