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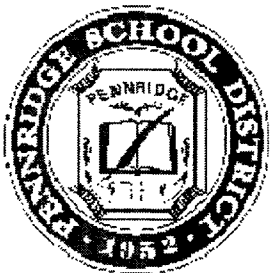
**From:** Zielinski, Arlene [AZielins@pennridge.org]  
**Sent:** Monday, October 19, 2009 5:35 PM  
**To:** IRRC  
**Subject:** COMMENTS RE: CHANGES TO REGULATIONS FOR ACADEMIC STANDARDS AND ASSESSMENT

To Whom It May Concern:

I am submitting the following comments on behalf of the Board of School Directors of the Pennridge School District and Dr. Robert Kish, Superintendent of Schools; I also subscribe to the views expressed.

*Dr. Arlene Zielinski, Ed.D.*

Assistant to the Superintendent for Program  
Pennridge School District



## **PENNRIDGE SCHOOL DISTRICT**

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RECEIVED  
INDEPENDENT REGULATORY  
REVIEW COMMISSION

**TO:** Independent Regulatory Review Committee  
Harrisburg, PA

**FROM:** Dr. Arlene E. Zielinski, Assistant to the Superintendent for Program

**DATE:** October 21, 2009

**RE:** COMMENT ON FINAL FORM REGULATIONS FOR ACADEMIC STANDARDS AND ASSESSMENT (#6-312)

On behalf of the Pennridge Board of School Directors and Dr. Robert Kish, the Superintendent of Schools, I want to express strong objection to the proposed changes in the State Board of Education's Academic Standards and Assessment regulations related to the Keystone Exams. The Pennridge Board has twice issued a resolution in opposition to additional state-wide testing, first with respect to the Graduation Competency Exam proposal and subsequently to the Keystone Exams.

Among Pennridge's specific objectives are the following:

- In the Pennridge School District, students who have not scored proficient on the PSSA have demonstrated the requisite understanding of state standards through a variety of other assessments including portfolios, oral presentations, hands-on demonstrations, and other methods. Our alternative assessments measure a student's ability to apply knowledge and skills to authentic tasks and, as a result, are far more sensitive to the demands of higher education and the workplace than any multiple-choice test. Although the current proposal makes reference to a "project-based assessment" that would be administered in addition to the Keystone Exams (and perhaps the PSSA as well), this

approach is too limited and vague to fairly assess students who can demonstrate the requisite competencies but do not perform well on standardized multiple-choice tests.

- At present, the results of standardized tests (such as PSSAs and ERB's Comprehensive Testing Program) and local assessments such as final exams and authentic performance tasks already provide our district with information about students in need of remediation, and another layer of testing will only confirm what is already known. As end-of-course tests, the results of Keystone Exams will be irrelevant to guiding ongoing instruction during the course itself; remediation, particularly if focused on selected course "modules," will occur after the student has completed the course and in a context unrelated to ongoing instruction. This lack of connection between instruction and assessment will be particularly acute in the sciences; for example, Biology remediation would occur while the student is studying chemistry or physics.
- While the Keystone Exams proposal permits districts to use an alternative locally-designed assessment option, these local assessments must be validated through an as-yet undefined process with as-yet undefined criteria and revalidation would be required every six years. The costs of developing true alternative performance assessments -- by PDE's own estimate -- would exceed \$25,000 per assessment for a total cost in excess of \$250,000 for all ten assessments, a cost far beyond the resources of most, if not all, local districts. Only the "validation" costs (estimated at \$2,500-\$7,500 per test) would be subject to cost sharing between the district and PDE. In essence, the "local option" is no option at all, giving districts no choice but to "voluntarily" use the Keystone Exams rather than incur the financial burden associated with the test development and validation process.
- Although the current proposal indicates that PDE will seek authorization from the US Department of Education to replace the current 11<sup>th</sup> grade PSSA tests in Reading, Math, Writing, and Science with the Keystone Exams in Algebra I, Literature, and Biology, there is no guarantee that such authorization will be given. If this request is unsuccessful, additional instructional time will be lost to duplicative and unproductive assessment. Nor does this approach address the issue of whether alternative assessments developed and validated by PDE, by local districts, or by consortia of districts would automatically qualify as acceptable performance criteria for AYP determinations.

Penndel is not opposed to assessments that measure its students' ability to actually perform authentic tasks and demonstrate understanding of essential concepts that are necessary in higher education and in the workplace. However, it remains opposed to tests that rely on multiple-choice questions and focus on easily-measured snippets of unrelated information. Not only do the proposed Keystone exams not reflect the essence of high-quality instruction focused on comprehensive goals, they have no counterpart in form or substance in higher education coursework or in the workplace. They are costly and unnecessary burden on school districts, high school students, and Pennsylvania taxpayers.