

RECEIVED

From: **To:** **Subject:** FW: Comments on proposed Graduation Competency Assessments-South Hills Area School Districts Association of School Directors

2008 MAY 19 AM 9: 49

INDEPENDENT REGULATORY
REVIEW COMMISSION

2696 comments

-----Original Message-----

From: shauna [mailto:shaunacpa@comcast.net]
Sent: Saturday, May 17, 2008 9:38 AM
To: j buckheit@state.pa.us
Cc: Kaufman, Kim; hippert@southfayette.org; Patti Schirripa; Denise Kuhn(Ringgold); Outreach; Gelnett, Wanda B.; Totino, Michael; Schalles, Scott R.; Wilmarth, Fiona E.
Subject: Comments on proposed Graduation Competency Assessments-South Hills Area School Districts Association of School Directors

Dear Mr. Buckheit:

Attached please find written testimony on behalf of the South Hills Area School Districts Association of School Directors with regard to PDE's proposed Graduation Competency Assessments, which we are submitting for publication per the review process.

Per your correspondence, I have removed the confidentiality notice, and I am resubmitting this document within the official 30-day public comment period.

Please note that SHASDA itself passed a resolution unanimously in opposition to the GCA proposal. In addition, 21 school districts within the SHASDA area also passed individual resolutions in opposition to the GCA proposal. Following are the SHASDA school districts whose school boards passed individual resolutions:

Baldwin-Whitehall
Bentworth
Bethel Park
Brentwood
Canon-McMillan
Carlynton
Charleroi
Chartiers-Houston
Chartiers Valley
Elizabeth Forward
Keystone Oaks
Mt. Lebanon
Peters Township
Ringgold
South Allegheny
South Fayette
Trinity
Upper St. Clair
West Allegheny
West Jefferson Hills
West Mifflin

Again, thank you in advance for your consideration of our comments.

5/19/2008

Shauna M. D'Alessandro
President, South Hills Area School Districts Association of School Directors
Board President, West Jefferson Hills School District
304 Springhouse Drive
Jefferson Hills, PA 15025
Phone (412) 653-4250
Fax (412) 653-0316

2696

Comments on
**Chapter 4 Revisions Designed to Provide for
Graduation Competency Exams**

Presented by

Shauna M. D'Alessandro

President, South Hills Area School Districts Association (SHASDA)

President, West Jefferson Hills Board of School Directors

Member, Allegheny Intermediate Unit Board of Directors

Director, West Jefferson Hills Chamber of Commerce

For the

Independent Regulatory Review Commission

May 14, 2008

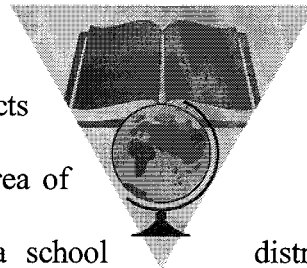
RECEIVED

2008 MAY 19 AM 9:49

INDEPENDENT REGULATORY
REVIEW COMMISSION

My name is Shauna D'Alessandro. I am serving in my fifth year as a school director for the West Jefferson Hills School District and in my second year as Board President. I am also a director for the Allegheny Intermediate Unit serving the forty-two school districts in Allegheny County. However, I am providing written testimony via this document on behalf of the SHASDA area school directors for which I am currently serving as the President of this coalition of elected officials. I would like to present some background information on SHASDA.

The South Hills Area School Districts Association (SHASDA) is a consortium of twenty-two school districts interacting to improve public education in the South Hills area of Pittsburgh. Superintendents from twelve South Hills area school districts began meeting regularly in 1969 sharing ideas and concerns with their neighboring districts on a monthly basis. Curricular issues were reviewed, and soon other administrators concerned with the improvement of instruction were meeting to plan cooperative in-service experiences for staff.



The advent of public school employee bargaining called for the involvement of personnel directors who shared information about practices and policies within the SHASDA membership. A "data bank" was developed to help the districts obtain a broader

perspective on bargaining issues. Today, countywide data of this nature is gathered by the Allegheny Intermediate Unit; thus, the purpose for gathering collectively has evolved from SHASDA's original establishment.

Over the years, school directors recognized the need for unified advocacy with regard to other educational issues on behalf of children. Meeting monthly, they studied legislative proposals and contacted state representatives in support of protecting local control of public education. The number of participating districts has increased considerably from the original twelve and is currently at twenty-two school districts. SHASDA interacts with the six state senators and thirteen members of the Pennsylvania House of Representatives who share the responsibility of representing in Harrisburg their constituents living in the SHASDA area.

SHASDA has sponsored a spring conference since 1978, attracting school directors, administrators, and students to the annual event. The theme of this year's conference is "Doing the Right Thing for the Right Reasons." Whether one's role is student, administrator, or school director, our challenge is to do what is right, rather than what is easy. We as SHASDA school directors have collectively raised our voices in opposition to PDE's proposed Graduation Competency Assessments because it is simply the right thing to do for the students of our respective school districts. SHASDA districts are comprised of school districts with diverse populations of students in many respects, which includes socioeconomic demographics, academic test rankings, and percentage of special needs and special education students, to name just a few of our differences. Given that diversity, SHASDA school directors representing all twenty-two school districts voted unanimously at our January meeting to adopt a resolution in opposition to the State's proposal to mandate high-stakes standardized testing as a requirement for high school graduation in the state of Pennsylvania.

Graduation competency assessments are yet another example of one more unfunded mandate and a further attempt to erode the local control of school boards. Why is “local control” so essential in maintaining the integrity of our local public schools? Because of the diversity that exists among school districts. We, as school directors, are citizens from our various communities who are elected by our neighbors to represent the best interests of our respective community members. We understand the needs of our students, and we observe firsthand the effects, both good and not-so-good, that decisions made in Harrisburg have on our students and our taxpayers. We recognize that the effects of high-stakes graduation tests will not serve the best interests of the children in our communities and will not be an efficient use of scarce taxpayer monies.

The Department claims that the \$15 million initial cost of developing these tests will be fully funded, and they challenge groups such as SHASDA, PSBA, PSEA, PTA, PASA, and many others for labeling the state’s implementation of this endeavor an unfunded mandate. Considering the fact that this \$15 million has been proposed to develop just three of the ten mandated tests, we are talking about an expenditure of \$50-\$60 million just in test development costs. We are living in a global and ever-changing world. These assessments will become obsolete not long after they are printed and disseminated. Who will absorb the costs necessary to maintain the relevancy of these tests as the rate of information in our world rapidly grows and changes? Who will pay for the expenses incurred by local school districts in providing the additional remediation services that will be required for students who are not proficient on these additional ten assessments? How will three more test taking periods affect our already limited instructional time, and will the addition of these exams result in districts merely teaching to another test, as has been the unintended outcome of the PSSA tests? Who will reimburse school districts for the payroll expenses incurred as a result of the compensatory and substitute teacher time that will be necessary in administering and grading these exams? Who will absorb the ongoing cost of test development and third-party validation should a district opt to design its own high-stakes local assessment? Who will pay for the costs of additional human capital that will be

required to keep track of which student passed which module of which of the ten tests? And who will be left holding the financial “bag” when a new administration comes to the town of Harrisburg with a whole new and different set of legislative priorities? No matter how one spins it, we are talking about spending a great deal of taxpayer-earned money on this project. Make no mistake – GCAs **are** an unfunded mandate with a price tag that will be borne by the taxpayer in some way, shape, or form. In a time when tax increases are routinely blamed on school boards, and given that referendum is a fact here in Pennsylvania, we do not need another unfunded mandate; nor do we need another test to teach to, in an already too short agrarian school year.

Educational resources are scarce, as evidenced by the recent Costing-out Study, which reports that if we are going to help all of Pennsylvania’s children meet the state’s academic standards, we need to come up with an additional \$4.4 billion in education dollars. It is not fiscally responsible to taxpayers, nor is it fair to our children, to allow financial resources and instructional time to be further depleted in the design, implementation, grading, and reporting of additional standardized tests to be given to high school students, when these resources could be more wisely spent on educational initiatives designed to raise student achievement. In roundtable discussions with our students from the SHASDA high schools, we are told repeatedly by high-achieving students of their frustration with the time diverted from the active learning of challenging and relevant material, which they say they will remember and use in the future, as so much of their time is spent in short term memorization for the many high-stakes tests which they already take in high school. Our students take the PSAT, SAT, ACT, various PSSA tests, AP tests, as well as subject-area mid-terms and final exams required as dictated by established curriculum. Is the mandate to pass an additional six tests fair to our children? What about the student who just happens to be, not a poor student, but a poor test taker? Is it fair to withhold a diploma from a child who experiences test anxiety and who most certainly will experience it more than ever when all of the graduation eggs are in the basket of a graduation competency assessment? How many proficient students will be denied a diploma, and consequently entrance

to a post-secondary institution, because they “choked” on the high-stakes tests? PDE has yet to produce any hard data to demonstrate the need for such tests, nor have they considered the negative effects of such a hastily made decision.

We question where the state of Pennsylvania plans to take us with the implementation of such a policy agenda, which will dictate the eventual adoption of a state-wide or even national standardized curriculum, as advocated by Achieve, Inc. and the American Diploma Project, on whose Board of Directors Governor Rendell sits. We would argue that this type of major shift in education policy, a shift to a state-wide cookie-cutter curriculum, is not a decision to be made only by the Governor and the Department of Education, with no input from elected legislators or from the professional educational community at large. This policy initiative is not good for our children, nor is it good for Pennsylvania because the establishment of curriculum is best when done at the local level by educators who are closest, and able to be most responsive, to the needs of the students they serve, not by bureaucrats in Harrisburg. High-achieving school districts provide a broad selection of curricular offerings, course selections that encourage the arts and music education, as well as courses that often are not required but which allow for the development of a student’s creativity, collaboration, and problem-solving skills. Educators realize that these course offerings help to develop the talents and skills necessary for our children to successfully compete against students in other countries and in a world where automation has rendered many 20th century careers obsolete. School directors also have an obligation to provide training to students whose career paths may be better served in a vocational-technical school. Students who choose this path will be disproportionately harmed, as the curricular offerings taught in vocational-technical schools are not of the nature to be measured by one of these high-stakes tests, but rather are better judged by the evaluation of hands-on classroom activity. The effect of the implementation of high-stakes graduation testing will be to narrow the curricula of local school districts, which in most districts will have a “dumbing-down” effect on their curriculum. Having listened to and read published material of innovators and educators like Dr.

Willard Daggett, Daniel Pink, and Ken Kay, who are making strides in helping students acquire the 21st century skills essential for our children to compete in a global and ever-changing economy, SHASDA school districts realize that another standardized high-stakes test to teach to is not a solution to the problems that face our educational system. The children of Pennsylvania deserve much more than a one-size-fits-all educational curriculum.

We all agree that a high school diploma should mean something. School directors are unpaid elected officials who give a great deal of their time to volunteer for public service because of their passion for education – and because they believe that all students can learn and that all students deserve a diploma that means something. High-stakes tests will not increase the value of that diploma. Better oversight of the local assessments can be one of the many solutions necessary to improve the value of a high school diploma in Pennsylvania. Just because a student has difficulty passing a standardized test does not mean that student is not ready for graduation or cannot achieve success in his/her post-secondary endeavors, as PDE contends and has yet to demonstrate via any hard data. With that in mind, the current regulations permit school districts to utilize a locally designed assessment, one that is aligned to state standards, to evaluate a student who does not demonstrate proficiency on the PSSA. Currently, a student who does not pass the PSSA test may demonstrate proficiency when considering his/her portfolio submissions, oral presentations, hands-on demonstrations, and classroom tests. This option considers the needs of the diverse learner, and it is fair to our children. The local assessment under the new proposal will effectively take away the option for a diverse learner to demonstrate proficiency via the current measuring tools, in favor of another locally designed, high-stakes, expensive standardized test. Again, PDE has not produced any valid data to justify their claim that the current locally designed assessment is not a reliable measure of proficiency and should, therefore, be discarded in favor of an expensive, locally developed “validated” assessment. Rather than mandating this new requirement on all districts because of the recalcitrance of those districts whose local assessments do not meet the state standards, resources could be better spent on monitoring the

alignment of the local assessments and enforcing changes when deemed necessary at the local district level.

In conclusion, the SHASDA school directors would like to set the record straight. We want you to know that we have not been brainwashed by our state association. We have drawn our conclusions as a result of much research, discussion, debate, and careful thought. We realize that the value of thirteen years' worth of education can never be quantified in a series of paper and pencil standardized tests. We understand that our children, who are entrusted to us, are much more than test scores. We listen to our teachers, our administrators, and our constituents; and we realize that we are faced with very limited resources of both money and time. We hear dedicated teachers, teachers who have chosen their profession because it is their vocation in life, tell us of their increasing frustration in that they are losing those "teachable moments." They do not have time for the teachable moments because accountability is being measured by the ability to teach to a test rather than in the formation of the child.