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125

Buckheit, James

RECEIVED

reply sent 5/19/08

From: shauna [shaunacpa@comcast.net]**Sent:** Saturday, May 17, 2008 9:38 AM

2008 MAY 27 AM 10:48

To: jrbuckheit@state.pa.us

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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.

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

5/19/2008

Fax (412) 653-0316

5/19/2008

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

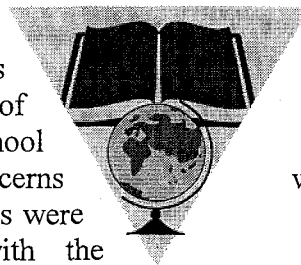
For the

Independent Regulatory Review Commission

May 14, 2008

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.

State Board of Education
Public Comments received May 17-23, 2008
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Buckheit, James

From: pattyocrandall@aol.com
Sent: Friday, May 23, 2008 10:30 AM
To: jbuckheit@state.pa.us
Subject: Support Changes to Graduation Requirements

Sample Form letter

Mr. Jim Buckheit
State Board of Education
333 Market Street
Harrisburg, PA 17126

Dear Mr. Buckheit:

I am writing to express my support of the State Board of Education's proposal to change graduation requirements in Pennsylvania and develop a consistent measurement of student achievement. These regulations clearly will help ensure that all high school graduates demonstrate proficiency on the state's academic standards and possess a uniform knowledge and skill base. The proposal also establishes a set of supports for students and schools to help students reach their fullest potential.

Our students are competing with students from around the corner and around the world for college admissions and for jobs. We know however, that too many young people are graduating without the academic foundation and skills needed to succeed. Pennsylvania needs a strong system of supports for students and schools coupled with a common statewide accountability system so that all our graduates are prepared for the rigors of postsecondary education and 21st century careers.

The State Board's proposed regulations offer students and school districts a variety of options to assess student achievement of the state's academic standards. The proposed regulations also call for specific supports for students and for schools -- including mandatory remediation for struggling students, voluntary model curriculum that is aligned with the standards, and professional development and technical assistance for teachers and schools.

I support the State Board's proposal as a sensible approach to make certain that every student from every school district in the Commonwealth has achieved the state's academic standards and is prepared to transition to postsecondary education, 21st century occupations and productive citizenship.

Sincerely,
Patty Crandall
1697
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Pittsburgh, PA 15241

State Board of Education
Public Comments received May 17-23, 2008
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Buckheit, James

Sample letter

149

From: Mindek, Renee [MindekR@TESD.NET]
Sent: Thursday, May 22, 2008 10:22 AM
To: jbuckheit@state.pa.us; irrc@irrc.state.pa.us; jrhoades@pasen.gov; musto@pasenate.com; jstairs@pahousegop.com; jroebuck@pahouse.net; dmlne@pahousegop.com; crubley@pahousegop.com; eerickson@pasen.gov; andydinniman@pasenate.com
Subject: GCAs

Dear Representatives, Senators, Educators and Officials,

I am writing to express my opposition to the GCAs.

I am opposed because the introduction of GCAs would result in a state-controlled curriculum that reduces a local school district's ability to provide a curriculum based on the diverse community needs and desires.

I am opposed because the addition of the GCS battery reduces the number of instructional days and would impose an unreasonable load of high-stakes testing on students who are already facing a burden of stressful standardized tests.

I am opposed because we already test our students in math, reading and science through the state PSSA exams.

I am opposed to double testing of our students.

I am opposed because students in our district are already reaching proficiency in reading, math, and science either through the PSSA exams or through a comprehensive, local assessment.

I am opposed because GCAs do not test our students on relevant 21st century skills, and valuable class time will have to be diverted to prepare students to take these additional tests.

As a teacher, I am saddened and offended that legislature such as this has made it this far through the system. Teachers choose to teach because of a love of their students and their subject. Students thrive on this love. When that is replaced with yet another form of standardized testing, what will really be the difference between individualized instruction and students memorizing information for a test?

Most sincerely,

Renée Mindek
Tredyffrin/Easttown Teacher

5/23/2008



Tredyffrin/Easttown
SCHOOL DISTRICT
738 First Ave. | Berwyn, PA | 19312

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Comments on the Proposed Graduation Competency Assessment

The State Board of Education has officially posted the regulation regarding the proposed Graduation Competency Assessments (GCAs) in the Pennsylvania Bulletin. There is a 30 day comment period during which community members may submit written comments, suggestions or objections regarding the proposed regulation to be considered by the Independent Regulatory Review Commission (IRRC). All comments submitted during the 30 day period will be recorded by the State Board of Education and attached to the regulations as they move through the process.

Contact Information

Interested community members are invited to submit comments on the GCA proposal to Jim Buckheit, Executive Director, State Board of Education; the IRRC; and the Republican and Democratic Chairs of the Senate and House Education Committees: Senator James Rhoades, Senator Raphael Musto, Representative Jess Stairs and Representative James Roebuck. In addition, please consider sending a copy of your comments to local legislators: Representative Duane Milne, Representative Carole Rubley, Senator Edwrickson, and Senator Andrew Dinniman.

For ease of sending your comments via email, here is the list of contact email addresses to copy and paste into your email:

jbuckheit@state.pa.us; irrc@irrc.state.pa.us; jrhoades@pasen.gov; musto@pasenate.com;
jstairs@pahousegop.com; jroebuck@pahouse.net; dmilne@pahousegop.com; crubley@pahousegop.com;
erickson@pasen.gov; andydinniman@pasenate.com

Sample Letter and Talking Points

Sample letter to copy and paste into an email and then customize:

State Board of Education
333 Market St.
Harrisburg, PA 17126

Dear Mr. Buckheit, and State Board of Education Members,

I am writing to express my opposition to the GCAs.

(Choose reasons that best convey your feelings about the GCAs.)

I am opposed because GCAs will not be provided in a format that meets the needs of diverse learners.
I am opposed because we already test our students in math, reading and science through the state PSSA exams.

I am opposed to double testing of our students. I am opposed because students in our district are already reaching proficiency in reading, math, and science either through the PSSA exams or through a comprehensive, local assessment.

I am opposed because GCAs do not test our students on relevant 21st century skills, and valuable class time will have to be diverted to prepare students to take these additional tests.

Most sincerely,

(name)

Tredyffrin/Easttown resident

If you prefer to compose your own letter, here are some talking points from the T/E School Board's March 24th resolution opposing the GCAs:

- Our local school district is currently preparing all students for success in college and the workplace
- Unlike a school district's own local proficiency assessment, GCAs do not offer the flexibility to meet the needs of students who have different learning styles and do not permit assessment of students in nontraditional ways.
- The addition of the GCS battery reduces the number of instructional days and would impose an unreasonable load of high-stakes testing on students who are already facing a burden of stressful standardized tests.
- The introduction of GCAs would result in a state-controlled curriculum that reduces a local school district's ability to provide a curriculum based on community needs and desires.
- Students who have received offers of acceptance from colleges may not have the opportunity to attend if they fail to pass a test.
- The current proposal could have significant economic impact on school districts operating under A fiscal restraints and the required expenditures have no proof of effectiveness.

For more information on the GCAs, please visit the [Graduation Competency Assessment web site](#).

This is an important piece of legislation that could affect children in Pennsylvania beginning with the graduating class of 2014. The deadline to submit comments on the GCAs is **June 16, 2008**, so don't let the school year end before sending your comment!



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5/08, ccb