

**Buckheit, James**

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**From:** ShadowCHB@cs.com

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**Sent:** Saturday, May 24, 2008 1:42 AM**To:** j buckheit@state.pa.usINDEPENDENT REGULATORY  
REVIEW COMMISSION**Subject:** Reasons for Rejection of the Proposed Graduation Competency Assessment Regs.

The proposed Graduation Competency Assessments (GCA) are a simplistic 'silver bullet' solution to a complex educational problem. The last time I checked my grimoire, silver bullets only work on werewolves.

As someone who has worked with quality assurance in a nuclear safety context, I know that you cannot test quality into a product. Testing does not make a product better. The only thing that testing can do is identify failed or potentially failing parts.

If the educational system was not testing students, then perhaps the introduction of a final exit check might be warranted. That is not the case. The state already has tests that measure retention of standards-based course content, the PSSA tests. Individual school districts have final exams and other measurement instruments that they believe adequately measure student learning.

The underlying problem is that the Pennsylvania Department of Education (PDE) has failed to adequately monitor, inspect and review the adequacy of the existing testing instruments, both at the state and local level. The probable reason for this is lack of sufficient resources to carry out this responsibility.

The proposed silver bullet solution is the GCA. The thinking appears to be that fewer PDE resources would be used by monitoring the creation by an outside contractor of a statewide uniform test, and the oversight of the grading process for the GCA exams. I believe that the PDE has seriously understated and/or underestimated the actual resources that will be needed, to both implement and support the GCA's, and the costs to the Commonwealth.

This is also evidenced by the unreasonable times quoted for the results to be reported back to the school districts, and the disingenuous cost impact statement issued with the regulations.

Not even taking into account PDE's internal costs, there will be additional actual costs to districts to implement, administer, transmit, and process the results of the GCA's. The ridiculous statement that the GCA's would be able to replace final exams in the subjects tested is an example of the thinking that went in to trying to disguise the actual cost to the Commonwealth of this GCA test.

Since the GCA's will not and cannot be designed to test critical thinking skills, problem analysis and information synthesis, they will never be substitutable for a competent final exam in a subject.

What is missing in the GCA proposal is a 'root cause' that justifies the GCA as a solution. Let me illustrate with a true story.

A nuclear plant was having a security problem. A group of raccoons was setting off the security alarms on the perimeter fence. Someone in security jumped to a conclusion that the simple solution was to trap and release the raccoons in a remote area of the state. They did that. Two weeks later, the problem surfaced again, with a totally new group of raccoons.

At that point, a root cause investigation was started. Eventually, the root cause team found that the plant had taken to dumping garbage from the plant, including the cafeteria, in a temporary dumpsite inside the fence. This had been done to limit the number of times a garbage truck would have to be escorted onsite. When the plant moved the garbage dump outside the security fence, the raccoons stopped trying to get through the fence.

The point is, GCA's are just 'moving the raccoons'. PDE already has a pretty good idea where there might be problems from the PSSA tests. How else could they be getting the information that they are stating to 'justify' (sic) the GCA regulations? (Quoting a PDE spokesman at a recent PSBA meeting - "nearly 1/3 of Pennsylvania's

students are still below grade level" - "Even in our most successful schools, an average of nearly 1 in 6 students are below grade level")

I'm not going to challenge these defamatory assertions here, or talk about how the schools of today have to deal with many students who in different economic times could have quit school without a high school diploma and gotten a job that would provide them with a living wage. I just note again that testing could do nothing to remedy a situation where the students were not learning.

The course of instruction or methodology of instruction has to be analyzed, the root cause(s) of the problems determined and corrective action has to be taken, in order for the problem to be resolved. PDE could do that now, with the information they have and the regulations in place that permit them to do so.

If they are not doing it before the expense of the GCA hits their budget, why and how is PDE going to change their resources and resource allocation model to come in and address the situation after the GCA's have redundantly pointed out that a 'problem' exists?

As far as I can determine, there is no effort by PDE to plan to do such a program of remediation, and therefore, for the reasons and arguments outlined above, the GCA regulation proposal represents both a waste of taxpayer money and a silver bullet when we don't have werewolves.

It doesn't even move the raccoons. It just introduces unwarranted bureaucratic expense to school districts without a hope of solving anything.

The proposed GCA regulations should be rejected out of hand.

Sincerely,

ChuckBallard  
Board Member  
East Penn School District

The statements above represent the opinions of Mr. Ballard, and are not the official opinions of the East Penn School District Board of Directors. That board has, however, passed a formal resolution in opposition to the adoption of the GCA regulations.

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