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INDEPENDENT REGULATORY
REVIEW COMMISSION

May 23, 2008

Jim Buckheit, Executive Director
PA State Board of Education
333 Market Street, 1st Floor
Harrisburg, PA 17126-0333

Dear Mr. Buckheit:

This letter is presented as written testimony concerning the proposed changes in Academic Standards and Assessments – IRRC #2696, Regulation # 6-312. I have also enclosed a copy of Northern Lebanon School District Board of Directors Resolution opposing this proposal.

Please permit me to begin by thanking you for the opportunity to share my thoughts on the board's proposals and future thoughts for the board's review.

I would like to address the proposed mandates concerning the Graduation Competency Examinations. While many Pennsylvania public school leaders believe in the educational value of assessing student knowledge in reading, writing, mathematics, science and social studies, most also agree that the type of assessment must vary in scope and sequence.

FORMS OF ASSESSMENT

In the ideal school setting, assessment would only take on the form of written tests and quizzes. The problem is that no school is ideal and no one student is similar to the next. While individual student assessment strategies are mixed and varied at the local level and most assessment tools focus on the way students learn. All too often the imposed testing placed on local schools by state-level education departments does not center on the manners in which students learn. State standardized assessments are given in written form that require individual effort, no availability to resources, and maximum time limits within consecutive multiple-day schedules. Additionally, these imposed tests are considered the sole assessment to highlight the success or failure of students. While an assessment instrument can be used for these purposes, we must remain primarily focused on an assessment tool that gives the student multiple ways to exhibit their knowledge.

The terms assessment, final or examination often bring about feelings of fear and anxiety to students. As I sat with a high school student discussing the statewide assessment, I reviewed how she would be assessed and how the scores would reflect on her and the district. As I ran through a litany of sample test questions, time constraints, and the requirement for a diploma, a look of fear came across her face as she responded, "I don't think I am going to do well on these tests." Taking tests of this magnitude is simply overwhelming to most students.

On the other hand understanding the conditions in which learning takes place can greatly enhance assessment strategies and decrease student anxiety. Most educational experts focus on three common student learning styles. First, "hands on" types of activities appear to be one of the most successful student learning styles. The second style includes conditioning through reading and individual motivation. Third, verbal learning is one of the most important styles of learning and is the basis from which our educational system was developed. Attempting to force all students to fit one learning modality is simply another form of 19th century institutional compliance.

Additionally, there are three key reasons why state-level tests should not be used as the sole assessment of student academic success. First, tests are not able to successfully assess the curricular diversity of each district. There is a significant difference between what is taught culturally and what or how it is actually tested. Second, these tests are mainly developed with the thought that "good questions" only produce fifty percent of correct responses. Most standardized tests actually steer away from questions that most students perform well on. Third, these tests do not take into account the students' family support or learning that takes place outside the school setting. It is also believed standardized test scores can actually be calculated by zip code. In the areas where parents place education as a priority, students almost always perform better than those areas that do not. These issues are not curriculum or standards related and yet state departments continue to promote the need for curricular enhancement, school takeovers, and now threaten students by denying them a diploma based on student achievement scores.

A century ago it was possible to pass on to children all of the important knowledge of our culture, in the industrial age. Most forms of state-level and federal testing are still designed with the assumption that we are preparing students for the industrial age. How we assess student learning can no longer use the methodology of the 19th century. The total volume of knowledge and information is now so vast and is changing so rapidly, what we must do now and for the future is prepare students to be able to find, retrieve, and process information, to think critically; to analyze; to draw conclusions; and so on. These are things, which cannot be assessed by any state-wide, standardized test.

INDEPENDENT REVIEWS

Various types of authentic and performance-based assessments are now in use all across America, and are widely recognized as the most valid measures of a child's knowledge and skills. The proposed requirements go beyond these nationally recognized academic forms of assessment by mandating an independent review of the local assessments. On the surface this validation may appear to be necessary and reflective in nature but it will only be perceived as another politically-motivated unfunded mandate. This proposal begs a few questions.

- Who will be the independent reviewer?
- Will the review be completed by an individual or a team of individuals?
- Will the reviewer(s) be Pennsylvania certified and qualified teachers?
- Who is expected to fund this activity?
- What cost will be associated with this process?
- Will it be the district's responsibility to obtain the reviewer?
- Will the state be responsible to assign the reviewer?

No independent review is needed if the teachers have access to the **actual** GCA if, in fact, standardized tests are a valid assessment and the sole source of student graduation. The local district can then create in-service programs to incorporate these assessment procedures into their annual professional development programs. This will provide concise and essential student evaluations that are targeted for individual student success. Currently it is very apparent that the state must more clearly define in concept and question what students are to learn. For instance, if a student is to learn their multiplication facts the state should be required to develop an assessment tool that matches the type of individual classroom instruction of multiplication facts. Obviously, that would be unmanageable at the state level. So why not create the state level multiplication test, give it to the schools, have the teachers teach it, and then assess the students in the same manner? This is simply an example of a small multiplication fact section of a total Mathematics assessment; however, the entire assessment should be given to the teacher for instructional purposes.

Summative assessment is only half of the equation; the other half is formative assessment. Without proper feedback of performance and, more importantly, how to improve performance, assessment is useless. It is important to remember that test development and student knowledge assessment is a complex task that should not be implemented as the sole assessment for student proficiency.

The GCA's

The State Board proposal goes on to note that the Department will administer at least ten Graduation Competency Assessments (GCA) in various subjects at a minimum of three times per year. This proposed pathway to student proficiency is not only unrealistic it will be impossible to financially support unless the State Board requires the local taxpayer to pay the bill.

“So what should we assess? We should assess what students need to become active engaged citizens – in a sense, what it takes to be expert citizens” – Robert Sternberg (January 2008). The GCA is not an assessment that signifies the future but one of the past, not an assessment of the 21st century but one of the 19th century, not an assessment of educational vision but one of institutional compliance and finally an assessment of simple educational fact and not one of educational wisdom.

The ABC's of the GCA's: *(It appears the State Board of Education believes...)*

- A rigorous end of the course-long assessment already produced by local Pennsylvania certified and qualified classroom teachers will be eliminated because the teacher's assessment skills are insufficient for students to be successful.
- Boards of School Directors at the local level who provide strict graduation policies and then equip educators with top notch materials will no longer be needed because the local community members can't be trusted to create proficient graduation policies.
- Clients of the local public school (the students) who are gifted with multiple skills and abilities waiting to unleash their individualism in the 21st century will be lost to 19th century institutional compliance.

Students' success is better defined as helping all students enter the world of work (technical academic) or post secondary school (traditional academic). In either case we can ensure success if students can expand their educational opportunity and increase their knowledge. Instead of continuing to narrow our educational focus toward standardized testing or graduation examinations, why don't we expand our educational opportunities to add significant value to the diploma? The 21st century diploma should show advanced student knowledge and expanded educational access to help meet the needs of high schools, post-secondary institutions, and future work environments all at the same time.

Utilizing the Pennsylvania Department of Education recorded number of students in Pennsylvania public schools, approximately 140,000 students will be tested on an annual basis. Given the minimum of ten tests given three times per year, the Department could expect to administer and correct more than 1.5 million tests annually. The Department personnel alone needed to complete this task is monumental. In the event the Department contracts this assessment to outside contractors the financial impact would be astronomical. In light of the recent costing out study which shows a significant shortfall in state funding already, it would be irresponsible, not to mention, politically suicidal to even broach this subject.

Interestingly enough the State Board has not even completed statewide standards/benchmarks for some of the subjects they propose to be assessed. One can only hope that the implied success exhibited in this part of the proposal can guarantee all public school parents that passing these tests will result in immediate and long-lasting career or collegiate success for their sons and daughters.

GRADUATION CREDIT

The final concern I have with the current proposal is the focus on the utilization of Advanced Placement (AP) and/or International Baccalaureate (IB) exams to meet student proficiency. To be clear, these exams could be excellent student proficiency tests, however, this may be short sighted.

The State Board should greatly expand their vision to grant proficiency for dual enrollment, virtual, and college in the high school programs. As educational leaders go through the annual rituals of developing academically challenging standards and helping prepare students for future life, the need for increased cooperation among high schools, employers, and colleges must expand greatly. More specifically, college-level courses could be taught in local high schools to increase student knowledge and gain educational wisdom rather than just becoming proficient on a graduation test.

Several states, including ours, have begun to authorize meaningful financial grants that afford local schools the ability to advance their dual enrollment types of programs. The grants are valuable financial tools that assist students, parents and schools to pay for the advancement of student learning on the collegiate level. "Through Dual Enrollment we will give our students an important advantage that will benefit them throughout their careers. This investment in our young people will help to ensure Pennsylvania has a highly educated and skilled workforce to face the challenges and opportunities ahead." (Gov. Ed Rendell)

It appears the State Board of Education and the Department of Education are spending all their time **preparing** students for their future careers or college-level coursework when the students could be actually **achieving** their future goals while attending high school.

I have had the privilege to work for a school district that has been the recipient of several competitive grants that provide the funding streams to high schools and post-secondary programs. In collaboration with the Harrisburg Area Community College students are now able to achieve an Associates Degree while still enrolled in high school. This program would also allow any qualified student to be awarded with three college credits and one high school credit for each dual enrollment class offered. Ultimately students are counseled toward sequential courses taught in high school, as well as virtually, to achieve a sixty-one college credit associate's degree, which runs simultaneously during their high school experience.

If we focus on bringing the public schools, community colleges, trade schools and the state run universities together we can eliminate additional financial debt. We can eliminate thousands of dollars from the state budget in standardized testing fees, student tuition fees, and ultimately save taxpayer dollars.

So I ask myself, why should educational leaders embrace a statewide paper and pencil graduation test (PSSA or GCA), when students could be earning an Associates Degree while attending high school? Now that is what I call real 21st century value in a diploma.

DIPLOMA

In the event the State Board of Education chooses to ignore the enormous amount of assessment data, expert advice from the Pennsylvania certified and qualified teachers, parents and students, I make one final recommendation.

The State Board of Education should issue a state level diploma to those students who pass the PSSA and GCA's. The students who continue to pass the rigorous local assessments, without passing the state level standardized assessments, could still be issued the local diploma.

It would become the sole responsibility of the state to inform colleges, universities and employers of the significance of their diploma. Likewise, it would be the local school district's responsibility to inform colleges, universities and employers of the significance of their diploma.

Thank you for the opportunity to present this testimony.

Sincerely,



Dr. Don Bell
Superintendent of Schools

DB/mg

cc: U.S. Senator Spector
State Senator Folmer
State Representative Swanger