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Buckheit, James

From: Elliott Seif [elliottseif@verizon.net] 2008 JUN -4 PM 1:38
Sent: Thursday, May 29, 2008 3:49 PM
To: j buckheit@state.pa.us
Subject: Public Comments About the GCA proposal

INDEPENDENT REGULATORY
REVIEW COMMISSION



Public Comments to
the Propose...

TO: Jim Buckheit, Executive Director, State Board of Education,
Pennsylvania
FROM: Elliott Seif
RE: Analysis of Graduation Competency -High School Graduation
proposal from the State Board

Attached are comments about and analysis of the proposed GCA's - High
School Graduation Requirements. Please accept this as public comment.

Thank you.

Elliott Seif

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*Public Comments about the Proposed Changes To The Pennsylvania State Graduation Requirements,
By Elliott Seif*

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Public Comments about the Proposed Changes to Pennsylvania State Graduation Requirements

By

*Elliott Seif, PhD
Educational Consultant*

What are the proposed changes to Pennsylvania's graduation requirements?

“GCAs would be offered at least three times each year, at the end of the traditional Fall, Spring and Summer semesters. They would be scored so that schools would have the results for graduating seniors at least 10 days prior to graduation. GCAs may be composed of modules containing course related content to permit a student who fails to achieve proficiency on the GCA to retake only those modules in which they were not successful. This will permit the student and school to focus remediation efforts at the course material in which the student was not successful.

School districts could use any combination of assessment instruments (PSSA, GCAs, local assessments and AP/IB) to determine whether students are proficient in each discipline. Students only need to demonstrate proficiency on one type of assessment in each discipline in order to be deemed proficient for purposes of high school graduation.”¹

What are the potential problems with the proposed requirements?

1. The development of CGA's doesn't take account of the already sophisticated development of assessments (and instructional improvement plans) in many school districts in Pennsylvania. Many districts have worked hard to develop curricula and assessment processes that are at high levels, probably higher than any that would be developed on the state level. Many high schools already have developed high quality subject area final exams that all students take. Some districts have developed alternative assessment systems that include portfolios and performance tasks. Districts have also developed curriculum and instruction plans to help students meet their high standards. The power of these district assessments and instructional plans are demonstrated by increasingly high test scores on the PSSA, and on the levels of achievement and success their students have in the outside world and in colleges across the county. These districts should be encouraged to maintain, extend and share their systems, not be forced to abandon them or to subject them to a costly and complicated validation system.
2. Will the development of GCA's and a required assessment process enable more students to improve their levels of achievement? In fact, such a development may turn out to be counterproductive, with fewer students meeting graduation requirements and more students dropping out of school. Many students who are not good test takers may find these proficiency levels too hard to meet. Some will not pass some of the tests because they are talented in some areas but they cannot meet standards in other areas and will not be allowed to graduate. It is already difficult to keep students in school – this might make it harder. There are also no plans to provide students with the kind of help and support that they will need to succeed on these tests – the costs of any help and support would have to be borne by local school districts.

The best way to improve achievement is to encourage districts to develop strong, relevant curricular programs, improve teaching training and in-service education, develop strong professional learning communities, use more formative assessments, and provide strong leadership within each district and school. On its

6. Because of the decentralized system of educational requirements in Pennsylvania, its 501 districts often have very different curriculum requirements at different levels that will cause problems for implementing a standard set of GCA's across the Commonwealth. For example, some districts teach American history programs with different historical eras taught at different levels. Still others maintain survey courses. A few districts use alternative mathematics programs that are interdisciplinary in nature. A "one size fits all" set of GCA's will present serious problems to many districts with their varied curriculum requirements.
7. Another problem is more technical – the relationship of the current State Standards to the development of a State Assessment System. Simply put, the current version of the State Standards cannot be used to develop a course based assessment system. Many of the State Standards are too general and do not provide enough guidance for the specific goals of the proposed courses, such as Algebra, Geometry, Biology, and so on. The history standards have been given F ratings by outside organizations –they are unwieldy, unclear, fragmented, and lack specific goals and content needed to develop and design history courses at the high school level. They would need to be totally revised and redesigned so as to be "instructionally sensitive" and focused.
8. Finally, this system will make it more difficult for districts that opt for the use of GCA's to develop creative, alternative courses and programs. It has the potential of stifling the creativity of some of our best teachers statewide, and probably many of our best and most creative teachers will leave the profession as a result.

**What are some suggestions for alternatives to and
for the development of the GCA's?**

Given all of these questions, issues and potential problems, what are some suggestions to solve these problems? To make sure that a new system helps students achieve at higher levels and demonstrate their knowledge and skills that will help them in a 21st century world?

1. The current plan assumes that nothing good is going on in assessing students in Pennsylvania, and that the State of Pennsylvania will develop the "answer". This top down approach ignores all the good work that has been done in many of the 501 school districts in Pennsylvania over the last ten years, and essentially will substitute a top down system for the flexibility and strengths of a decentralized system. Therefore -- rather than totally scrap the current system, assume that it is all bad and develop a totally new system, the best alternative is to work with districts across Pennsylvania (and even in other states) to discover and share assessment systems that are working, that measure a variety of ideas and skills needed in a 21st century world, and that include curricular, instructional and assessment approaches that help students meet high standards. This "bottom-up" approach – learning from districts and using what districts already have in place – is a much better alternative than scrapping all the work that districts have already

appropriate course or once every semester. Eliminate the modular nature of the tests – students who do not pass the test should be required to retake the entire test (only because of the nightmare of administering modules for each student for ten different tests). Provide regional test sites over the summer months (sponsored and paid for by PDE) for students to retake the tests.

- Include the graduation project as part of the proficiency assessment system. The graduation project assesses some aspects of proficiency that are critical in a 21st century world but are not assessed through traditional assessments. Develop a clearer set of criteria for the graduation project so that these proficiencies are assessed (collecting, processing and evaluating information, writing coherently, conducting presentations, etc.). Graduation projects would be assessed at a local level.
- Clarify the specific characteristics of the GCA's and their connection to subject area coursework. Require that the GCA assessment system focus on the "big ideas" of a course, "core knowledge", and "key processes and skills". Developing a GCA assessment system that focuses on a few clear, specific goals, content, processes and skills will require a major overhaul of the Pennsylvania State Standards. The newly developed Pennsylvania Standards and the GCA's should meet the following criteria:
 - Focus on "core" learning (e.g. specific, major ideas and key processes and skills) for each course and unit.
 - Have clear connections between Content Standards and GCA's.
 - Allow for in-depth teaching and learning on the content and skills that will be included on the GCA's, and provide time for teachers to focus on other course goals that might not be included on the tests.

The proposed regulations should also require each GCA to include questions that enable students to provide thoughtful answers to open ended questions and solve complex problems by "showing their work". They should enable teachers to provide in-depth instruction and formative assessments throughout a course, and also allow teachers to add their own components to a course so as to enable teachers to be creative in their approaches to teaching and learning.

- Allow districts some flexibility in terms of graduation requirements for individual students. Some students who cannot master every test are still at high levels and deserve to graduate – picture the talented art or music student who cannot pass the algebra GCT's! Not everyone will become proficient in all areas – districts need some flexibility to make the system work!

Some Final Thoughts

be eliminated as an option for measuring student achievement for graduation. The GCA's should be designed to measure an individual's core knowledge, understanding and skills, along with the ability to give thoughtful responses, to solve complex problems, and to deal with current issues and problems. This will require a major overhaul of the Pennsylvania State Standards to support a specific course-based system. The GCA system should also allow districts flexibility in keeping their own local assessment systems, in using AP and IB results in place of the GCA, and in adapting the requirements to meet the specific needs of individual students. The Department needs to simplify the administrative implementation of the GCA's, reduce the number of times it needs to be offered within a district, focus on it as an end of course test, and offer the retakes of the test during the summer months.

Since the graduation project required by Chapter 4 measures a different set of skills, it should also be defined more carefully as it is included as a requirement for graduation.

If these specific suggested changes are not adequate to solve the serious problems associated with the State proposal, then other alternative solutions should be adopted. The goal is to create a system that will work best to insure that students have a high quality education that meets their individual needs and enables them to live and work successfully in a 21st century world.

¹ Quotes taken from State Board of Education Discussion Paper, Proposed State High School Graduation Requirements, January 2008, on the State Board of Education Website. The newly proposed Chapter 4 regulation revisions were also examined in detail.