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From: Monty Neill [monty@fairtest.org]
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To: IRRC
Subject: comments on 22 PA Code Chapter 4 for Academic Standards and Assessment (#006-312) - graduation competency assessment proposal

Attached find FairTest's comments on 22 PA Code Chapter 4 for Academic Standards and Assessment (#006-312), also known as the Graduation Competency Assessment Proposal. We also mailed them to the Department of Education via regular mail.

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National Center for Fair & Open Testing

FairTest comments on 22 PA Code Chapter 4 for Academic Standards and Assessment (#006-312), also known as the Graduation Competency Assessment Proposal

by Monty Neill, Deputy Director

Since its creation in 1985 by leaders of major civil rights, education reform and student advocacy organizations, the National Center for Fair & Open Testing, Inc. (FairTest) has closely monitored the impact of state-mandated exit exams on both equity and educational quality. We have reviewed the Independent Regulatory Review Commission's (IRRC) criteria for evaluating 22 PA Code Chapter 4 for Academic Standards and Assessment, also known as the Graduation Competency Assessment (GCA) proposal. Based on two decades of evidence regarding the impact of similar proposals on educational quality and equity nationwide, we conclude the GCA proposal does not meet key aspects of the IRRC criteria and should not be approved.

We hope our comments will add substance and weight to the testimony of the many Pennsylvania civil rights and disability advocates, teachers, administrators, school board members, public school parents, and others who believe that the GCA proposal is not in the public interest.

Across the nation, tens of thousands of students are denied diplomas each year--regardless of how well they have done in school--because they did not pass a standardized state test. Under such policies, after 12 years of playing by the rules, working hard and completing all other graduation requirements, a student's future can hinge on just one or two points on a single standardized exam. The record shows the burden of such policies fall most heavily on low-income, minority, special needs and students who are learning English.

Misguided exit-exam mandates have increased dropout rates, especially among minority groups, and have focused classroom teaching on test preparation rather than 21st century skills. The full record in states like Massachusetts, Texas and California shows that high-stakes tests have failed to fulfill their promise of improved quality and equity for public school students.

The problems exit exams are meant to solve are real. Pennsylvania, like most states, has gaps in educational access, quality and outcomes. But exit exams won't cure these ills. For too many students, the cure is worse than the disease. Rather than provide better education and expanded opportunities, graduation tests add punishment - denial of a diploma - to those who most need help.

Proponents incorrectly claim that exit exams narrow achievement gaps. The National Assessment of Educational Progress reports no narrowing of achievement gaps at the high school level among racial groups for the past several decades (Neill, 2005). Nor have average high school scores increased. During this time, many states have imposed graduation tests, so that 65% of U.S. public high school students are now affected. Often, scores go up on the state exam

and more students pass, but according to independent measures such as NAEP, the state gains are mere inflation, not reflecting any increase in students' knowledge. In Texas, for example, the university system reported an increase in the numbers of students needing remediation after the state imposed its graduation test (Haney, 2000).

Real progress has been elusive because high-stakes testing, including No Child Left Behind, undermines rather than improves education. Untested subjects are ignored, while tested topics narrow to test-coaching programs. Since these tests are mostly multiple-choice, students focus on rote learning to identify correct answers instead of learning to think and apply their knowledge. Test prep is like holding a match to a thermostat and believing the room is warmer: Scores rise on that test; real learning does not.

The most thorough independent national research also confirms a link between graduation tests and higher dropout rates. Dee and Jacob found that the tougher the tests, the more the dropout rate increased (Dee & Jacob, 2006). Warren et al. found that graduation tests have caused the national dropout rate to increase by 40,000 students per year (Warren et al., 2006). California's dropout rate spiked in 2006, the first year students had to pass the state's exit exam to graduate, with 24,000 seniors dropping out, more than twice as many as four years earlier (Williams, 2007). Texas introduced exit exams in 1992. Fifteen years later, Texas used test results to deny diplomas to a record 40,200 students in the Class of 2007 (Radcliffe and Mellon, 2007).

Massachusetts "MCAS" tests have been touted as among the nation's best, and the claim has been made that the high-stakes MCAS has not caused the dropout rate to increase. The evidence suggests otherwise. Five years after the MCAS became a graduation requirement, dropouts are at a nine-year high. Between 1999-00, three years before the exit exam was implemented, and 2006-07, the number of students who dropped out of school increased by 24 percent, from 9,199 to 11,436. Claims that exit exams ensure better schooling for minority students are belied by black and Hispanic dropout rates that are more than two to three times that of whites. For the state's limited English proficient students, the annual dropout rate has been on a steady upward trend since 2003, from 7.6% to 10.4%. Further, 11th and 12th graders who have not passed MCAS remain more than 11 times more likely to drop out of school than those who have (MA DOE, 2007). Though the GCA proposal differs from the MCAS in some respects, we believe the MCAS experience is relevant, particularly in regards to the potential impact on graduation rates.

Moreover, in regards to the impact of graduation tests on public health, safety and welfare, Boston provides a cautionary tale. In 2006, Boston's annual dropout rate rose sharply, from 7.7% to 9.9%. At the same time, the city suffered a wave of youth violence. Boston City councilors, who solicited the views of local young people on why violence was rising, reported, "Students ... expressed massive frustration and boredom with the endless drilling and practice of the MCAS test and test preparation... Far too many students describe their school experience as an MCAS-centric environment... [as a result] the incentive for students to remain in school is tenuous."

In addition to feeding the dropout rate, tests have "measurement error," which means some children will fail even though they know the subject (Rogosa, 2001). Being able to take the test more than once helps, but does not solve this problem. There is also the well-documented

problem of test anxiety: An accomplished student may freeze, not do well on the test, and be denied a diploma (Hembree, 1988). For this among other reasons, the *Standards for Educational and Psychological Testing* state that a major decision about a student should not be made on the basis of a single test score (AERA, 2000). Being able to take a test more than once solves the problem for some, but not all students. Therefore, a graduation test hurdle violates the standards of the measurement profession itself.

No one wants to see youth leave school without the skills needed for success. Exam supporters say students shouldn't get meaningless diplomas if they can't pass the tests. But it's a student's overall transcript that makes a diploma truly meaningful. For example, high school grades are better predictors of college success than SAT scores. When college professors and employers are surveyed, they say projects and portfolios tell them far more about a candidate than test scores do. A standardized test is not a solid foundation for establishing meaning.

Moreover, the research shows that preparing for exit exams does not help build skills needed for college and employment. On the contrary, a focus on learning out-of-context facts to pass exit exams detracts from preparing students for the work required in college. A survey of professors and employers by Achieve, which promotes standards and tests, found many high school graduates are weak in comprehending complex reading, oral communication, understanding complicated materials, doing research, and producing quality writing (Achieve, 2005).

The evidence indicates that the costs of implementing and administering exit exams are high, but such costs are only the tip of the iceberg. More costly in the long run are the individual and societal costs of denying a diploma based on a state test score. Students without diplomas earn much less, are far less likely to maintain stable families, and are far more likely to end up in prison. Specifically, a household headed by a dropout costs society \$22,449 per year more in direct benefits and means-tested aid compared with a household headed by a high school graduate. Ironically, in the long run it would be less expensive to adequately fund schools than to pay for the costs of the resulting damage.

We believe it is time to rethink what students should be required to achieve before they earn a diploma. It's important to ensure sufficient resources to enable students to meet those goals. Then develop various ways in which students can demonstrate this learning and the state can check up on the system. Other states have avoided the exit exam route specifically because they recognized the costs can outweigh the benefits. Wyoming and Rhode Island, for example, have multiple measures systems of determining graduation. And while New Jersey does have exit exams, it also has a robust alternative graduation system that is accessible to more than 10,000 graduates a year. Access to this system, called the Special Review Assessment (SRA), is a major reason New Jersey has one of the nation's highest graduation rates, and some of the best rates for students of color, despite significant gaps with white students (Fine, 2007).

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