

Northern York County School District

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May 29, 2008

Mr. Jim Buckheit, Executive Director
PA State Board of Education
333 Market Street
Harrisburg, PA 17126-0333

Dear Mr. Buckheit:

I am writing to you to express my concerns regarding the Graduation Competency Assessments proposed in the revised Chapter 4 regulations.

First, allow me to outline those items which I strongly support relative to the current plan for GCAs:

1. I strongly endorse the concept of accountability through periodic assessment of achievement, particularly when that assessment is based on known expectations – in this case the PA Academic Standards, and as possible, a test blueprint and identified eligible content as currently available for the PSSA.
2. I support the variety of assessments across subject areas, requiring all students to engage in challenging content in math, English, science and social studies.
3. I support assessments which are given at the end of the instructional period. That is, the test is administered as a final exam immediately following course completion.
4. I support allowing the student to retake only that portion of the assessment which was initially failed, thereby creating an opportunity to focus intervention efforts on the content not mastered. In fact I suggested a plan to the State Board which would allow school districts to chunk the curriculum to allow for repeated re-administration by teachers.
5. While the notion that the use of Advanced Placement and International Baccalaureate exams in lieu of GCAs creates an additional option, realistically it does not address the needs of those students most needing options.

If I understand the GCA proposal correctly, the items above reflect the intentions of the current plan under consideration.

Second, I would like to recommend to you, several items which I believe would make the GCA proposal much stronger and more student-focused while still retaining the goals implicit in the proposal.

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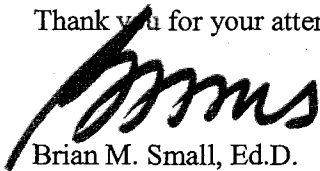
1. I believe that a more immediate return of test results is critical to providing necessary interventions for students who do not achieve proficiency, and would therefore suggest that the RFP require vendors to demonstrate how they will use current technologies for test administration, test scoring, and reporting of test results. For the most part the option for retesting using the PSSA does not permit test results to be returned in time to provide remediation in the needed areas before the 12th grade re-test is administered.
2. While the Governor is suggesting that the GCAs would be an additional way of demonstrating proficiency, the listed subjects are not ones that all students currently take. Therefore, the students most at risk would have fewer courses to choose from or they would be required to study courses above their ability levels.
3. The GCA program also forces schools and students to begin implementation as early as 8th grade, so that it actually adds to the amount of high stakes testing to which our students are exposed. For instance many students take Algebra I in 8th grade.
4. I believe the concept of testing multiple times throughout the year, as proposed, is necessary but would be further enhanced by the administration of the test, at a minimum, early November, at the end of January, early April, early June and early August to coincide with semester courses and summer school schedules. Ideally, five opportunities per year would be preferable to align with single nine-week term courses.
5. I believe the Governor's and Secretary of Education's goal to graduate students who are career- and college-ready is better served if the National Occupational Testing Institute (NOCTI) assessments were allowed to replace the requirement to score proficient or higher on six GCAs. Career and Technical Education School students, as well as vocational students within comprehensive high schools, who complete their programs and pass the NOCTI are clearly employment-ready. The NOCTI would be much better suited as a measure of a vocational student's program achievement. The NOCTI assessments require students to achieve both academic and vocational reading, writing, and math skills associated with their career choice, and are nationally validated assessments recognized by trade and industry. By using the NOCTI as an alternative to GCAs, Pennsylvania would be achieving goals associated with career development, workforce development and economic development. I have been told that not every vocational student takes the NOCTI. That would also be true of the International Baccalaureate and Advanced Placement programs. I believe it should be about finding appropriate assessments for all students.
6. I believe that successful completion of the Individual Education Program (IEP) as a path to graduation should be allowed. All students should be given the opportunity to enroll in courses for which a GCA is the final exam, but in the case of students with IEPs, successful completion of the IEP should supersede all other requirements for graduation.
7. I believe that inasmuch as the state has already utilized the concept of a differentiated diploma through recognition of proficient and distinguished graduates based on 11th grade PSSA performance, the state should also recognize that not all students who are proficient on the standards are equally able to demonstrate that proficiency using a standardized test. Therefore, we encourage the state to recognize three types of graduates: 1) those who achieve locally determined requirements and earn a local HS diploma, 2) those who earn a state-certified diploma based on achieving the local requirements as well as passing the six GCAs or the NOCTI assessment associated with their vocational program,

or 3) an "honors" diploma that recognizes a student who meets local requirements and exceeds the 6 GCAs or passes the NOCTI plus one or more GCAs.

Although research is inconclusive as to whether exit exams contribute to the high school drop-out problem, there is no evidence that exit exams decrease drop-out rates. Many studies have indicated the opposite.

Consequently, although there are as noted some positive aspects of this proposal, I don't believe it is ready to be implemented. The passage of legislation and the approval of regulations are a complex and political process and it is difficult to anticipate some of the unintended consequences. As a result it is not uncommon for all of us to spend several years trying to figure this out. Increased accountability for all students and all schools is a priority, -the question is how do we do that without establishing a "one size fits all" system that treats many students unfairly. As we all recall the NCLB legislation was passed in 2001. In 2008, we are still trying to figure out some of its implementation. Metaphorically, that train has left the station, but the tracks are still being laid. This is too important to the futures of many of our students to play trial and error. I would recommend that the State Board take the time to adequately assess the impact to all students before enacting these regulations.

Thank you for your attention to these recommendations.

A handwritten signature in black ink, appearing to read "B. Small", is written over the printed name.

Brian M. Small, Ed.D.
Superintendent

