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Buckheit, James

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From: Hohlweg, Jeanne [Hohlwegj@sasd.k12.pa.us]

Sent: Wednesday, May 28, 2008 3:29 PM

To: j buckheit@state.pa.us

Subject: Resolution Opposing Mandate

INDEPENDENT REGULATORY
REVIEW COMMISSION

Attached is a copy of the Shaler Area School District's Resolution Opposing the Mandate of PSSA/GCA's as a State Graduation Requirement. This was approved by our board of school directors on March 19, 2008.

Please feel free to contact should you need further information.

<<Graduation Requirement 3-08.doc>>

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**RESOLUTION OPPOSING PROPOSED HIGH SCHOOL GRADUATION COMPETENCY ASSESSMENTS
BY THE BOARD OF SCHOOL DIRECTORS OF THE
SHALER AREA SCHOOL DISTRICT**

WHEREAS, the State Board of Education has approved a proposal to revise the current high school graduation requirements under the Chapter 4 regulations to require students to pass a series of standardized high stakes Graduation Competency Assessments in order to get a diploma; and

WHEREAS, these new requirements and exams will be the same for all students, whether they are taking college prep or vocational courses, are English language learners or participating in individualized programs, and all students effectively will be required to take the same courses in order to pass this new battery of state tests; and

WHEREAS, Chapter 4 currently allows districts to use either the PSSA or rigorous local assessments for their students to demonstrate proficiency of the state academic standards; and it is misleading and incorrect to make the assumption that because students demonstrate their achievements on local assessments rather than the PSSA that there is a disconnect between proficiency and graduation; and

WHEREAS, although the GCA proposal permits schools to use a local assessment option, it establishes numerous limitations, including the elimination of the ability to use various assessment strategies now available to local entities and requires local tests to be closely modeled to the GCAs; and

WHEREAS, decades of research shows many reasons why standardized pencil and paper test scores should never be the determining factor in making major decisions about students, and that a diploma should be granted based on the coursework, tests and quizzes, presentations, projects and papers throughout the student's career; and

WHEREAS, the State Board of Education has not prepared a cost analysis or fiscal note, even though this will create a large financial impact on state and local budgets, and the State Board's own costing-out study did not include the costs for this new system and found that the state already is \$4.4 billion short in helping school districts prepare students to meet the academic standards by 2014; and

WHEREAS, the proposal requires school districts to absorb many new costs related to revising curriculum, professional development, test development and validation, test preparation and administration, remediation and other costs. Given the state's funding shortfall and the Act 1 limitations on tax increases, school districts have limited ability to fund these potential new costs.

NOW THEREFORE, BE IT RESOLVED that the Board of School Directors of the Shaler Area School District **opposes the State Board of Education's proposal to enact Graduation Competency Assessments** and any other regulation or legislation that usurps the authority of local school districts to determine whether their students have earned a high school diploma. This resolution will be shared with the State Board of Education, state legislators including local legislators and members of the Senate and House Education Committees, and the Independent Regulatory Review Commission.

Adopted this _____ day of _____, 2008.

Signed,

President, Board of School Directors

Board Secretary

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**Shaler Area School District Resolution Opposing
Mandate of PSSA/GCA's as a State Graduation Requirement**

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Unique to all other 501 Pennsylvania School Districts, the Board of Shaler Area School District has independently and consistently monitored, studied, researched, and have actively participated in the progression and transformation of the Pennsylvania System of School Assessment (PSSA) process at the state and local levels since its debut in 1991.

The Shaler Area School Board of Directors recognize its comprehensive modifications with each of the three governor's administrations, the appointment of each of the four secretary's of education, various and bi-partisan legislatures, various members of the Pennsylvania Department of Education and State Board of Education since 1991.

With these changing political winds, the school board also recognizes the indisputable changes in the purpose and utilization of the assessment. It is duly noted the assessment which began as a tool to measure programs school building by building within any given district has shifted to an assessment which is used to measure individual student achievement. This school board recognizes the assessment process currently used was created prior to the creation and adoption of the Pennsylvania Academic Standards as contained as an appendix to the Chapter 4 education regulations.

This school board recognizes that the PSSA was then utilized to assess how school districts were aligned and assessing students of the academic standards. This school board recognizes the continuum of the PSSA process to then proceed to mandate students' demonstration of proficiency of the academic standards and to provide the measurement of Adequate Yearly Progress initiated by the No Child Left Behind Act for accountability purposes. Now, this same assessment is proposed to be mandated as a graduation requirement of all high school students as a state exit exam in coordination of the proposed graduation competency assessment process.

Whereas, the Board of School Directors of Shaler Area School District, recognized the significance of accountability, the need for high academic standards, and assessment of such for providing Adequate Yearly Progress as the No Child Left Behind Act. We wish to affirm our opposition to the newly proposed concept of mandating the PSSA/GCA's as a high school graduation requirement for the following reasons:

1. The PSSA, throughout the years, has been shown to contain significant irregularities and serious flaws in scoring and processing that invalidate the test to be utilized as a high stakes exam for the purposes of students demonstrating proficiency of the academic standards as well as for graduation purposes. Past experiences as well as the multiple use of PSSA scores and consequence established throughout the years have raised considerable concerns over the high stakes nature of the test.
2. This proposal calls for the PDE to develop model curriculum in each of the content areas assessed by the 10 GCA's thus narrowing the curriculum of local school districts and shifting to a state-wide uniform curriculum whereas all students will be required to learn the same information and in the same manner. Contrary to the process, we take great pride in providing students at SASD a broad based curriculum menu of course offerings, some of which are not mandated but helpful in providing well-rounded students and preparing them to meet the needs of the 21st century. Furthermore, we

believe our own local standards and criteria for graduation are more rigorous and far exceed those of the state standards at this point in time.

3. We believe our vocational education students will be disproportionately harmed by this proposed plan as both regular education students and vocational/technical education students will be required to take the same test. For example, while subjects such as Algebra II are woven into some vocational courses, it is presented and taught in a different format than is provided in an academic Algebra II class. The student who learns the practical application woven into technical education will be required to take and meet the same testing requirements as the student in an academic classroom. This would be no different than requiring an academic classroom student to take apart and put back together an engine in an effort to pass a high-stakes assessment in order to graduate.
4. We believe the affordability factor will create a large financial impact on state and local budgets and taxpayers. Despite no cost analysis completed at this point in time, estimates are beginning at \$86 million+ as the initial cost for pursuing this statewide endeavor. The recent costing-out study did not take into account the costs for this new proposal. Costing-out study results indicate the state is already \$4.4 billion short of where it should be in helping students meet the academic standards. If that were to be true, and could be statistically proven, why would our own state now place all of our students and schools at such a disadvantage and now mandate passing of a state exit exam based on student proficiency of the state's academic standards? Why would we allow all students to be disproportionately harmed by instituting a plan in which they are at a distinct disadvantage, if the Commonwealth is not providing the appropriate financial support in helping schools and students achieve and succeed? It is commonly recognized by all that state funding of school districts is not equitable in appropriation or in distribution.

Furthermore, how will the state pay to develop, validate, and score 10 GCA's of each student in Pennsylvania annually? How often will the GCA's be revised and at what cost? Will there be various versions of each of the 10 GCA's as there are currently are of the PSSA formats? How much will that cost be for various versions of the same test and on an annual basis? How long will the state dedicate funding to this plan once implemented before being passed onto school districts and the local taxpayer?

We are opposed as a result of implementation of this specific plan to absorb the many new costs, including the cost and time of test preparation and remediation, administrative and teacher professional development costs, potential costs for enlarging and staffing summer school, costs for communication and outreach strategies to students, parents, and communities. This school board recognizes, given the state's funding shortfall and the Act 1 limitations on tax increases, school districts have limited ability to fund these potential new costs.

This school board recognizes the adverse administrative and staffing implications associated with implementing this proposed plan. GCA's would be offered three times a year (end of fall, spring, and summer semesters) in addition to the regular PSSA schedule which consumes an inordinate amount of student instructional time. Students who fail to achieve proficiency on the 11th grade PSSA or in one of the content areas can only retake the content module in which they were unsuccessful. Accurate record keeping, organization, and scheduling will be critical in ensuring all students are provided every opportunity to graduate with their appropriate class. Students who do not score

proficient on the 11th grade PSSA or a GCA administered in any grade must be provided remediation and supplemental instructional support. The tracking, record keeping, scheduling, and administration of this testing process will require all schools to hire additional staff exclusively to manage the administrative operations of this testing process. Students will be staggered and there will be cases in which some schools will find the need for extra physical classroom space to accommodate students who do not pass and/or graduate and choose to remain in school subsequent years trying to test out and that is in the event they do not drop out first. Has the state considered physical space of classroom issues associated with student retention in the 11th grade?

5. The Shaler Area School Board recognizes that the State Board of Education has included language which allows schools to use a local assessment but does so in a manner which impedes those efforts by design thus creating obstacles and disincentives making the "local assessment option" too expensive, burdensome, and not likely to be selected, therefore, abolishing the local assessment option as contained currently in the Chapter 4 education regulations. Contrary to existing regulations which allow districts to utilize multiple measures of assessments (both local and state) to determine proficiency of the academic standards, the proposed concept is insisting the "local assessment" must be an exam that is simply another graduation competency assessment (GCA) and must be comparable as well as to the national and state criterion referenced tests at a level of difficulty equal or greater to the GCA's. Schools will have to incur the costs associated with having the local test validated by a state-approved vendor and will be required to have their local assessment revalidated every five years. Districts must have a policy for annually updating assessment and curriculum items. It is our belief this design will force conformity among all school districts to not only a uniform state curriculum, but a uniform state assessment process.
6. The Shaler Area School Board opposes the adoption of a state-driven curriculum, assessments, and graduation requirements which infringe upon the local control of public school districts vested in locally elected school boards. Anything that comes in between that right and authority is clearly an erosion of local control. This is an "implied right" as vested in the General Assembly. The Pennsylvania School Code supports the statutorily defined autonomy of local school boards to determine curriculum and graduation requirements. PA School Code Section 1611 invests "the power to confer academic degrees, honorary, or otherwise..." to the board of school directors of the district and Section 1613 invests the power to issue high school certificates in the board of school directors. In Section 24 of the Pennsylvania Statutes (508) a majority vote of the school board is required to adopt courses of study. Therefore, it is our belief, that this "implied right to local control" will be stripped in lieu of schools focusing more attention on the tests which will drive the curriculum to a one size fits all, uniformed statewide curriculum. Schools which provide students broad opportunities for music, arts, forensics, and foreign language courses which are not required to be taken by students, but only required to be offered by school districts, will eventually fall to the wayside. Important skills that cannot be tested with standardized tests, such as writing research papers, public speaking, or conducting laboratory experiments, drawing CAD, or dissecting robotic engines and many other hands-on learning will not be taught. This narrowing of curriculum is most severe for low-income students and reinforces the inequity which already exists among students in schools.
7. It is our belief that efforts to help students should begin in early childhood grades and should not focus on a high stakes test with serious life-changing consequences in secondary school when testing

results are only required to be given to senior students ten days prior to graduation commencement. This is totally unacceptable when it may be already too late to help many students. Low performing students need to be identified as early as third grade when they have their first exposure and PSSA testing experience to demonstrate proficiency. We should identify students as early as that point in time and provide special help before elevating students onto the next grade level.

8. It is our belief that this testing proposal provides the State government a mechanism to allow the State to manage the state economy based on meeting specific needs, as a gatekeeper for students in determining who succeeds and goes onto college and who enters the labor workforce. This is no different of a time than in 1999 when the State Board of Education proposed the silver and gold colored sticker seals to act as a steering mechanism and encouraged the state-owned colleges and universities of the Commonwealth of Pennsylvania to use the results of this one time PSSA/GCA process as a basis of admission to these state-owned schools. Shaler Area School District opposed this concept then and we are now reaffirming our opposition to this newest plan by the State Board of Education.

BE IT FURTHER RESOLVED that the Board of School Directors of the Shaler Area School District directs the Superintendent of Schools to send copies of this resolution to the State Board of Education, the Office of the Honorable Governor of the Commonwealth of Pennsylvania, the Secretary of Education of the Commonwealth of Pennsylvania, the Pennsylvania Department of Education, to the chairs of both the Pennsylvania House and Senate Education Committees, and to our local representatives in the Pennsylvania House of Representatives and Senate.

FINALLY, BE IT RESOLVED that the Board of School Directors of the Shaler Area School District hereby directs the Superintendent of Schools and our Board President to communicate this resolution to other school districts within the Commonwealth of Pennsylvania, setting forth the views of this Board, and encouraging other school boards to take similar action in support of this issue.

RESOLVED, this 19th day of March, 2008.

BOARD OF SCHOOL DIRECTORS OF
SHALER AREA SCHOOL DISTRICT:

James Giel, Jr., President

ATTEST:

Charles Bennett, Board Secretary