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PA. STATE BOARD  
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Mr. Phil Waber, Superintendent

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Mary Woodworth, School Psychologist

Sandy Burns, At-Risk Consultant/ESL Teacher  
Dr. Ben Largey, School Psychologist

January 7, 2008

Ms. Karen Farmer White  
PA State Board of Education  
333 Market Street  
Harrisburg, PA 17126-0333

Dear Ms. Farmer White:

On behalf of the Wellsboro Area School District and our School Board of Directors, we are respectfully submitting comments regarding the proposed Chapter 4 Regulations.

While we welcome accountability for our staff and students with the goal of raising the "educational bar" for ALL students, we also share some concerns surrounding the content of the proposed regulations. Below is a summary of what we view as the strengths and potential areas for concern in the proposed Chapter 4 regulations:

Strengths:

- The GCAs provide an alternative assessment measure for demonstrating proficiencies in the State Standards for those students who are not proficient on the current PSSAs.
- The ability for students to take certain GCAs modules, rather than the requirement to take all modules. This is individualized and lends itself to addressing specific needs of each student.
- The ability for students to take the GCAs three times per school year.

Potential Concerns:

- The amount of time taken away from instructional activities that will be needed to administer all the state assessments. Teacher feedback already indicates that their instructional time is already limited and the addition of more standardized will further reduce the academic time used to provide educational opportunities that may not be assessed on a standardized state assessment.
- The proposed deadline for scores being returned to districts only 10 days prior to graduation causes planning issues for graduation for both the student and district.
- There are many questions relating to special education students who may demonstrate proficiency in one area (i.e. math) and not in another area (i.e. reading). Will those students receive a "regular" diploma, or will their proficiency in any areas allow them to have that distinction on a different diploma?
- There is a requirement of districts to provide "supplemental instructional support" for students not scoring proficient. This has the potential of being very costly to school districts. Is there a potential for grant money or state support in this area?

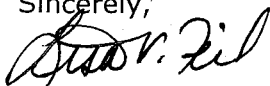
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- The costs associated with adding yet another test for materials, training, time, etc. Why the addition of another assessment in addition to the PSSAs?
- Current research in education is clear in stating that early intervention produces the most positive impact on students. Does it make sense to pour money and efforts into assessments at the tail end of a student's career, rather than focusing efforts on the RtI initiative and making a difference in the earlier grades?
- The differences between the PSSA and GCAs are unclear. Why add another assessment, rather than expanding the PSSAs to include the areas targeted by the GCAs? Educators are becoming more comfortable with the PSSAs. To add another assessment is confusing and taxing on an already taxed system of education.

In closing, we encourage the legislation to step back and fully develop these changes prior to mandating these regulations for public schools. From a school district standpoint, it is difficult to implement regulation changes while they are still being developed at the state level. It requires an extensive amount of time, money and effort to implement systemic changes. In addition, to gain the support of the teachers, who are inherently responsible for these changes, without being able to fully explain these changes to them, leads to concern and doubt in our educational mission. In our experience, it is better for students when these changes are well developed in the beginning phases and not left to trial and error.

We appreciate the opportunity to share our insight on the proposed legislation.

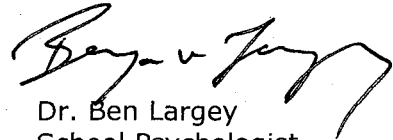
Sincerely,



Dr. Lisa Feil  
Director of  
Student Services



Mrs. Mary Woodworth  
School Psychologist



Dr. Ben Largey  
School Psychologist