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INDEPENDENT REGULATORY

RTSD Mission Statement

The mission of the Radnor Township School District is to inspire in all students the love of learning and creating, and to empower them to discover and pursue their individual passions with knowledge, confidence, and caring to shape the future.

May 27, 2008

Secretary Gerald Zahorchak
State Board of Education
333 Market St., 1st Floor
Harrisburg, PA 17126-0333

Dear Secretary Zahorchak:

On behalf of the Radnor Township School Board please be advised that we are opposed to the Graduation Competency Assessment revisions to Chapter 4 regulations in their current form.

As members of the Curriculum Committee we have reviewed the proposed regulation, reviewed the materials on PDE and other websites, and attended many of the hearings and meetings on the topic yet we have a number of concerns with the implementation of the regulations that we believe need to be addressed before the GCA proposal should be approved. Our approach has been to gather the facts and evaluate them based on the impact to Radnor Township and our ability to continue to deliver a high quality education within the constraints of our budget, school calendar and meeting the needs of all students.

Areas of Concern:

Section 4.24 C – Supplemental instructional support

"A Student who does not score proficient or above on a PSSA administered in 11th grade or GCA administered in any grade shall be provided supplemental instructional support by the student's school entity. The supplemental instructional support shall assist the student to attain proficiency in the State academic standards."

- Radnor is currently leaning towards using validated local assessments rather than the GCA's as provided for in section (b)(4)(iii). One concern with this section is that it implies PSSAs or GCAs will be used leaving no provision for the local assessments.
- Who pays for and administers the remedial instructional support?
- If there is teacher development needed, how will that be funded?

Section (b)(4)(ii) and Section (5) – GCAs

- What is the process to develop these tests and will districts be able to participate?
- Administering the PSSAs is a major burden for Radnor Township forcing us to interrupt instructional time for all other students in our school. Given the constraints already associated with the PSSA test, what provisions will there be to limit class time interruptions in the administering of the GCAs?
- What will the writing component to the GCAs be and who will grade it?
- Will these tests be given regionally, on-line or at local colleges?
- What capacity does the State have to process tests and provide timely results, especially for those tests administered in senior year?
- What will motivate students to take and perform well on the PSSAs if the district chooses alternate routes?
- We have heard discussion about the GCAs possibly taking the place of the PSSAs going forward. What is the official status of such a change to the State assessment system? A change of this nature would be critical to attaining support of GCAs.

Section (b)(4)(iii) - Locally administered, validated criterion reference assessments comparable to the GCA's.

This section goes into detail of the selection of approved vendors yet says little about the form of the local assessments themselves.

Radnor has several concerns about the details associated with the local assessments:

- What criteria will be used to approve a district's own exams?
- Can local assessments include topics/questions in areas broader than required by the GCA equivalence?
- A wide range of costs have been talked about at the various meetings for the local assessment validation process. What is the true targeted expense to the districts per exam?

Section (b)(4)(iv) – Advanced Placement or International Baccalaureate Exams

- How will the use of the AP/IB scores be used in relationship to proficient scoring on the PSSA?

Section (e) – Special Education program

There has been much talk by those against GCAs that ALL students regardless of their IEP status would need to demonstrate proficiency in all areas as the other students.

- What students will be exempt from reaching the proficient status of the PSSAs and GCAs?
- What will the requirements be for homebound students?
- What provisions will be made for English Language Learners; will there be a need for an interpreter or extended testing time?
- For those students with an IEP will portfolios or local assessments not validated per the GCAs qualify for a diploma?

Radnor shares the concerns expressed by other districts that we are already over testing our students and instructional time is already impacted in practicing and especially

administering the PSSAs. We do not want to give up another minute of instructional time or spend another dollar of taxpayer money on more testing unless we will learn something from that testing that will help us improve our students' academic performance.

Under Act 1 Radnor is working on a very tight budget. We have great concerns about the cost of the validation process, the cost of administering additional tests and the additional stress more testing will place on our children.

We urge you to slow down the process and continue to work with the school boards and administrators to address the issues with the Chapter 4 proposed changes. There are still many questions to be answered that may have an impact on the approach currently being taken. Radnor is willing and interested in working with you to find a solution that will serve all of the children well into the future and hope that you will continue the dialogue in an effort to find the best solution.

Sincerely,

Patricia Booker

Patricia Booker
Curriculum Committee Vice-Chair
Legislative Council Rep

Charles E. Madden

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Curriculum Committee Chair
Federal Relations Network Rep.

Kathy Fisher

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cc: Jim Buckhelt - State Board of Education
Senator James Rhoades - Senate Education Committee
Senator Raphael Musto - Senate Education Committee
Representative James Roebuck - House Education Committee
Representative Jess Stairs - House Education Committee
Senator Domenic Pileggi, Senate Majority Leader
Senator Joseph B. Scarnati, III, President Pro Tempore
Senator Robert J. Mellow, Minority Leader
Senator Connie Williams
Representative Bill Adolph
Representative Greg Vitali
Representative Bryan Lentz