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Buckheit, James

From: Whitesel, Curt [cwhitesel@muasd.org]
Sent: Wednesday, June 04, 2008 11:52 AM
To: jbuckheit@state.pa.us
Subject: GCAs

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INDEPENDENT REGULATORY
REVIEW COMMISSION

Mr. Buckheit,

Please accept my attached letter as my response to the GCAs. I find it to be degrading and disheartening for our students to have to endure another test, a test that will be the sole decision maker for their future. I am appalled at the thought of this test.

If you have any questions of me please feel free to contact me.

Sincerely,

Curtis Whitesel
High School Principal
Mount Union Area School District
(814)542-2518
cwhitesel@muasd.org

6/4/2008

JOINT STATEMENT IN OPPOSITION TO GCAs

We, the undersigned organizations, representing hundreds of thousands of Pennsylvania citizens including parents, teachers, students, children with disabilities, gifted children, members of minority groups, school principals, school superintendents, and school board members, oppose regulations proposed by the State Board of Education that essentially would mandate high stakes standardized high school exit exams. The Graduation Competency Assessment (GCA) proposal would result in denial of diplomas to students if they do not score "proficient" on statewide standardized tests. Our concerns include:

- A paper and pencil standardized test is a very imperfect measure of what students have learned. Current regulations require each school district and area vocational technical school to create a local assessment system, of which local graduation assessments are a part. Local graduation assessments must be aligned with the state academic standards and be used to determine the degree to which students are achieving the standards. Local assessment systems, including the local graduation assessments, must include a variety of assessment strategies, including portfolios and research papers, presentations, projects and assignments, results of exams, scientific experiments, works of art, and musical or theatrical performances. These types of assessments provide a richer, more accurate and fairer measure of what students know than can a few paper-and-pencil tests. The state should not override these "local assessments" with one-size-fits-all standardized tests.
- While the proposal continues to allow the use of local assessments for graduation purposes, it creates numerous costly barriers in the name of test "validation" that would be a disincentive for most school districts to continue using local graduation assessments. The proposal also allows the use of Advanced Placement and International Baccalaureate exams as a graduation test; however, these programs are limited in their availability to Pennsylvania high school students. Therefore, the only option for high school graduation for most students under this new proposal would be scoring proficient on the PSSA or on six out of 10 GCAs. For all practical purposes, there would be no local option for students to graduate.
- If the state has concerns about local assessments, the proper first step would be to analyze local graduation assessments. Local assessment systems may be, in fact, a better measure of students' knowledge than the PSSA. It is premature to impose a new set of standardized tests on students in 501 school districts prior to a formal evaluation of the local assessments they currently utilize.
- Denying a student a high school diploma has serious long-term negative effects on that student's life, as well as significant social costs. Before fundamentally altering Pennsylvania's system and structure for earning a diploma, the state must be sure that the change will not unfairly hurt our young people. It would be appropriate to first audit the local graduation assessments of various districts to determine why some students do not score "proficient" on a PSSA test but do show, through local assessments, that they have mastered the curriculum. It is inappropriate to assume that paper-and-pencil standardized tests are so accurate that students who do not score highly enough should not be able to graduate from high school.

- The differences between the number of students who score “proficient” on the PSSA and the number of students who show they are “proficient” through local graduation assessments must be considered in light of the fact that the PSSA was not designed to be an exit exam. In fact, thousands of students who scored “basic” on the PSSAs have gone on to college without any need for remediation. Some GCA proponents say that students who do not score “proficient” on the state PSSA cannot even read at grade level. That is not what a basic score on the PSSA means. Such a claim has never been supported by any data and has, in fact, been disproved. The state’s own PSSA validity study (HumRRO), which reviewed students at three Pennsylvania universities, shows that several thousand students in those universities who scored basic on the PSSAs, in fact, went on to college with no need for remedial classes. Among all three universities, 58.7% of students who scored basic or below on the PSSA tests took at least the standard level Math or English college course. That is, most students who “failed” the PSSA enrolled in nonremedial college courses in the same subject area(s) in which they failed. (Andrea L. Sinclair and Arthur A. Thacker, (2005) Relationships Among Pennsylvania System of School Assessment (PSSA) Scores, University Proficiency Exam Scores, and College Course Grades in English and Math, (HumRRO FR-05-55) Tables 16, 17, 18, 19, 20.)
- Dropout rates have increased significantly in states that have begun to use a high stakes exit exam. (Warren, J.R., Kulick, R.B., & Jenkins, K.N. 2006. High school exit examinations and state-level completion and GED rates, 1975 through 2002. *Education Evaluation and Policy Analysis*, V28, N2: 131-152) (Dee, T.S. & Jacob, B.A. 2006. Do high school exit exams influence educational attainment or labor market performance? Social Science Research Network, April) (Radcliffe, J. & Mellon, E. May 12, 2007. TAKS tests cost 40,000 Texas seniors chance to graduate, Houston Chronicle.) (FairTest Examiner. January 2007. Exit exam update: WA, TX, CA, AZ, MA). There are costs, both human and financial, of putting kids out on the street who are willing to come to school, want to come to school, and want to do their work, but know they are not going to do well on paper-and-pencil standardized tests. Minority and ELL students have been especially hard hit.
- Career and technical education students would be disproportionately harmed by the GCA proposal. Students in career and technical centers spend much of their time learning specific professions. While math content is woven through some vocational courses, it is in a different format than is provided in an academic Algebra II class. Career and technical education students take professional exams in the areas in which they have been trained. Yet, both the student who takes a college preparatory, academic Algebra II class, and the student who learns the practical application of Algebra II concepts in his or her profession would be judged on the same academic Algebra II test.
- No formal cost analysis of developing, distributing, and administering GCAs has been provided, but it is clear that the minimum costs will run into the tens of millions of dollars. In his 2008-09 budget proposal, Governor Rendell proposed spending \$15 million for the development of three of the 10 required GCAs. These costs will increase significantly because the GCAs must be administered at least three times per year, which will require three different versions of each test. The expense is even greater when the cost of providing remediation in the various components of all of the tests is added. In the end, hundreds of millions of dollars are at stake -- all for a type of testing system that

has not been shown to improve student achievement but has been shown to have negative effects on student dropout rates, on curriculum offerings, and on the success of minority student populations.

- No matter what financial outlay it would take to develop and implement GCAs, that money could instead be used to make a positive difference in students' lives and achievement -- i.e. it could be used for evidence-based programs and initiatives. These could include: establishing parental involvement programs; reducing class sizes in the early grades; funding transition programs to help students move from elementary to middle school and from middle to high school; providing safe, professional working conditions for teachers and students; instituting funding equity; or other evidence-based initiatives.

The undersigned organizations respectfully request that the Pennsylvania General Assembly reject the proposed Graduation Competency Assessment regulations:

**American Federation of Teachers
Pennsylvania (AFT-PA)**

The ARC of Pennsylvania

**Autism Society of America/PA
Government Relations Work Group**

**Disability Rights Network of
Pennsylvania**

Education Law Center

**Learning Disabilities Association of
Pennsylvania (LDAPA)**

**Mental Health Association in
Pennsylvania (MHA PA)**

**NAACP - Pennsylvania State Conference
of NAACP Branches**

**National Center for Fair & Open Testing
(FairTest)**

**Pennsylvania Association of Agricultural
Educators (PAAE)**

**Pennsylvania Association of Career and
Technical Administrators (PACTA)**

**Pennsylvania Association of Elementary
and Secondary School Principals
(PAESSP)**

**Pennsylvania Association for Gifted
Education (PAGE)**

**Pennsylvania Association of Pupil Services
Administrators (PAPSA)**

**Pennsylvania Association of Rural and
Small Schools (PARSS)**

**Pennsylvania Association of School
Administrators (PASA)**

**Pennsylvania Association for Supervision
and Curriculum Development (PASCD)**

**Pennsylvania Middle School Association
(PMSA)**

**Pennsylvania Psychological Association
(PPA)**

Pennsylvania PTA

**Pennsylvania School Boards Association
(PSBA)**

**Pennsylvania State Education Association
(PSEA)**

**Pennsylvanians for the Education of Gifted
Students (PEGS)**

Philadelphia Student Union

List is current as of May 29, 2008