

2696

Form Letters - 3

Form Board Resolutions

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585 James G. Routh	Jamestown Area SD Boar	PO Box 216	Jarr PA	16134
586 Cynthia A. Snyder	Penncrest SD Board	18741 State Hw	Sae PA	16433
589 Charles Place	Elk Lake SD Board	PO Box 100	Dim PA	18816
590	Susquehanna Cty CTC	PO Box 100	Dim PA	18816

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INDEPENDENT REGULATORY  
REVIEW COMMISSION

**RESOLUTION OPPOSING PROPOSED HIGH SCHOOL GRADUATION COMPETENCY ASSESSMENTS**  
**BY THE BOARD OF DIRECTORS OF THE**  
\_\_\_\_\_**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 \_\_\_\_\_ 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,

Attest:

\_\_\_\_\_  
School Board President

\_\_\_\_\_  
Board Secretary (seal)

May 22, 2008



## **CALL TO ACTION!!**

### **GCA Regulations Published; Public Comment Period now until June 16**

The State Board of Education has published its GCA proposal in the May 17 edition of the *Pennsylvania Bulletin*. As we've been discussing with you over the last few months, this means that a 30-day public comment period is now in effect. **Official comments must be made to Jim Buckheit, Executive Director, State Board of Education, 333 Market Street, Harrisburg, PA 17126-0333, or to [jbuckheit@state.pa.us](mailto:jbuckheit@state.pa.us) by June 16, 2008.** Your comments will be shared with the Independent Regulatory Review Commission and the House and State Education Committees, who will also have an opportunity to comment as well.

School boards and individual school board members that had submitted comments previous to May 17 to IRRC, the House and/or Senate Education Committee, the governor or the State Board of Education, must re-submit them to the address above in order for them to be on the official regulatory review record. The same rules apply if you want to make sure that your resolution becomes part of the permanent record. PSBA is not planning to submit the resolutions since we would only count as 1 comment, not 160, which is the number of resolutions we have on hand.

**This is also your last opportunity to demonstrate your school district's opposition to this proposal by adopting a resolution to that effect.** As stated previously, we have resolutions from 160 school districts, but we would like to get double that number. A sample resolution is available at <http://www.psba.org/issues-advocacy/issues-research/assessments-testing-nclb/resolution-opposing-GCAs.pdf>. Many of you are concerned that adopting a resolution would reduce your chances of receiving state aid or somehow lessen your eligibility for certain programs. If you have received statements expressing consequences for publicly opposing the GCAs from any state official, it should be reported immediately to your state legislator(s) and to PSBA. An overwhelming majority of legislators oppose this proposal currently. Reports of heavy-handedness or intimidation on the part of the administration will only strengthen that opposition and will hasten defeat of this proposal. School districts and CTCs need to stand together on this issue because it will demonstrate that we are as determined to defeat it as the proponents are to get its approval.

Those of you who attended this past weekend's Legislative Advocacy Conference received the "conference edition" of PSBA's "Graduation Requirements – Local Assessments & the GCAs." This document can be used to help you develop your comments, so feel free to "borrow" from it. The document will evolve over time since additional research is coming in almost every day that shows that graduation tests are not an effective way to help students reach proficiency or to be successful in the future. This document is available at the following link <http://www.psba.org/issues-advocacy/issues-research/assessments-testing-nclb/GCA-white-paper-05-08.pdf>.

Additional information about the proposal can be found on the web site of the Independent Regulatory Review Commission ([www.irrc.state.pa.us](http://www.irrc.state.pa.us)). One thing you will notice is that the proposal has been given two numbers, one an IRRC number (2696), and the other, a regulation number (6-312). These are not important in the long run, but are a means by which to identify the proposal whenever dealing with IRRC or other state agency. **You should also include these numbers on your comments to identify the**

**proposal on which you are commenting, along with the name of the proposal which is Academic Standards and Assessments.**

One of the attachments to the proposal is a Regulatory Analysis Form, which can be found immediately after the text of the proposal itself. This form details the proposed costs and effects that it will have on school districts and others according to the State Board. Note that the State Board estimates the cost of this proposal to school entities (listed as "local governments" in the form) is zero. This is an area that you need to focus on in your comments using estimated costs to your district for test administration, increases in the cost of remediation and other additional costs that you think this proposal will create in your district. The State Board also estimates the cost to the commonwealth would be \$160 million over five years. Your comments should also include alternative uses for these dollars, such as insuring that school districts' assessments are meeting state regulations and providing technical assistance and sharing best practices so that all districts test their students as current law requires. Some of the dollars can also be used to continue providing the types of services to districts that have been proven to raise achievement levels.

If you have any questions on submitting comments or what they should say, please feel free to contact PSBA's Office of Governmental and Member Relations at (800) 932-0588, ext. 3325 or 3319.