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INDEPENDENT REGULATORY
REVIEW COMMISSION

Jim Buckheit, Executive Director
State Board of Education
PA Department of Education
333 Market Street, First Floor
Harrisburg PA 17126-0333

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PA. STATE BOARD
OF EDUCATION

Dear Sir:

I am a 15 year Board member in the Great Valley School District. I also sit as President of the Chester County Intermediate Unit Board of Directors. CCIU serves 12 very diverse districts – diverse in size, in population, in economics, in every way. Once again the State Board of Education and the PA Dept of Education are advocating another one-size-fits-all-solution. The problem, this time, is that some students are graduating without passing the state's PSSA (Pennsylvania State System of Assessment) tests, so therefore, according to PDE, that means the districts are giving "empty" diplomas.

PSSA tests appeared back in the mid 1990's as a way to measure how students were meeting the new state academic standards. When No Child Left Behind appeared from the Federal government, Pennsylvania was ready with standards and a testing system. PSSAs were now used to track district and school success. Many districts take this quite seriously. Great Valley, as an example, has 92% of graduating seniors at proficient or advanced, the state's desired level. We do this while spending \$400 less per student than the target amount identified by PDE's own Costing Out Study. How do they do that? Eleventh graders who are not proficient or above must enroll in special math and/or language arts courses their first semester of senior year and must re-take the PSSA. If they are proficient, they can return to their regular course of study. If not, they must remain in those courses and pass a rigorous series of local assessments to graduate with their class.

Now PDE is advocating Graduation Competency Assessments (GCAs) for all districts. Students will be required to take a series of 10 tests in multiple subjects in order to graduate – and of course, they still need to take the PSSAs.

Instructional time is already impacted up to 25 days every school year directly practicing or administering the PSSAs. Additionally, every district has local assessments, tests, quizzes, the PSATs, SATs, ACTs, AP, and NEAP exams. Aren't our students tested enough? Ask any parent or student.

The State already spends over \$32 million per year on the PSSAs. It is estimated that to develop the series of GCAs will cost over \$50 million and it will take another \$40 million a year to administer these tests. Would it not make more sense to take this money and find out what "successful" school districts are doing and what hasn't? Would it not make more sense to target that money to districts that are already struggling, for whatever reason, to meet the PSSA standards?

Shouldn't educational policy be focused on using the limited taxpayer dollars and limited instructional time to improve the achievement of ALL students?

PDE knows which students and districts are not making the grade already. Why not take the existing test knowledge, real life experiences of teachers, counselors, and administrators, and why not ask students and graduates, to find ways to help ALL students become more successful?

The IRRC states that there will be no costs to districts for the proposed GCAs. Do they believe these tests will be administered locally by volunteers? That volunteers will track each student and each of the ten tests the student needs to take and each of the three modules of each of the ten tests that the student needs to complete to be sure that each student passes six tests (18 modules) required? That volunteers will run the remediation classes for the students who miss a module? That software companies will donate the programs that will be required to track 1100 students each taking different tests at different times in modules leading to graduation? And what about the ULTIMATE cost? The students who will look at these tests and can't or won't take them, preferring to drop out and take their chances? This won't be just the "lower" rungs of the academic ladder. Our best and brightest students, particularly those in the arts - whose courses will be cut to have time to put these in place, will leave our schools, knowing there are real world ways to demonstrate their ability. Talk to your AP scholars and recent graduates, your artists, your scientists. They will tell you that "mickey-mouse" tests and boring classes are NOT the way they learn.

GCAs are a bad idea for our students and a really bad idea for our Commonwealth. There already is a series of state academic standards and tests to show proficiency if that is what we want to use as a measure. Enforce these tests, help districts that need help, talk to those of us that are trying to figure it out.

Sincerely,

Katherine A. Pettiss

