

**From:** foltzfamfive@aol.com  
**Sent:** Friday, June 13, 2008 2:22 PM  
**To:** j buckheit@state.pa.us; IRRC  
**Cc:** CSainato@pahouse.net; JGibbons@pahouse.net; mbrooks@pahousegop.com; glavalle@pasenate.com; rrobbins@pasen.gov  
**Subject:** Regulation 6-312 Academic Standards and Assessments

June 13, 2008

The Honorable Jim Buckheit  
Executive Director, State Board of Education  
333 Market Street  
Harrisburg, PA 17126-0333

RECEIVED  
2008 JUN 13 PM 2:29  
INDEPENDENT REGULATORY  
REVIEW COMMISSION

Re: Regulation 6-312 Academic Standards and Assessment

Dear Sir:

I am writing to express my **opposition** to the proposed establishment of a new set of criteria, the Graduation Competency Assessments, that would impose upon all students in the state of Pennsylvania, additional tests beyond those assessments made by educators in the classroom as part of their ongoing studies and multiple PSSA exams required by the state in accordance with current regulation.

I believe that the assumptions made by the State Board of Education as a basis for the creation of the GCA exams are false and undocumented. No study exists of the students who did not reach proficiency on the PSSA exam. Thus, the reasoning that the GCA's are what are required to ensure proficiency is suspect.

I believe that the State Board of Education has not offered any data to show that these exams will accomplish their purpose. On the contrary, I believe that instituting these exams will further narrow the curriculum; limit or altogether eliminate instruction in art (spatial relationships), music (creativity and math skills), foreign language(s), and other non-tested (business courses) and elective subjects; and continue to promote "teaching to the test" and test-taking skills, detracting from real learning.

I believe that the proposed GCA exams are discriminatory because they represent a single method to assess a student's proficiency. As proposed, the GCA exam is a single method of assessment, that being a pencil and paper standardized exam. This affects many students who can be, and are continually assessed by multiple methods. I believe that any one single standardized exam should not deny a diploma to a student who has demonstrated proficiency by other means. In a recent (June 2007 release) validity study by the University of California at Berkeley[1] high school grades were proven to be a better predictor of success in college beyond the freshman year as opposed to the scores received by students on a standardized exam. A key finding of this study was that the high school grade point average was consistently the strongest predictor of four-year college outcomes for all academic disciplines, campuses and freshman cohorts in the sample, not the standardized test.

I believe that the assumption that the GCA exams can be used as "end of course" exams is unrealistic. The GCA exams supposedly will substitute as course final exams, but which course? For example, mathematics can be taught as separate subjects, Algebra I, Algebra II, Geometry, etc. but also as integrated concepts (see Houghton Mifflin Integrated Math series) that require students to develop a more comprehensive approach to the study of mathematics. The GCA exams don't "fit" that concept.

I believe that the State Board of Education has been negligent and has not completed a cost study with respect to the

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implementation of all ten of the GCA exams. In fact, the regulatory form states that “[L]ocal government will face no additional costs associated with compliance.” This is optimistic at best, foolhardy at its worst. Numerous additional costs would be incurred in administration of the exams, personnel, remediation, traing and data tracking. These funds would be more appropriately spent on proven methods to improve academic success.

I believe that the State Board of Education’s GCA proposal does more to harm student development than it does to encourage student development. Making students take multiple exams under threat of no diploma, only serves to make them more anxious, more resistant to the actual process of learning, which is extremely counter-productive. These exams are excessive for those who choose other occupations that require different sets of skills and different licensing exams.

As a final observation, the GCA proposal represents a 20<sup>th</sup> century approach to an extremely complicated issue in a 21<sup>st</sup> century learning environment.

Lynn Foltz  
Parent of 3 children in the Wilmington Area School District  
School Director Wilmington Area School District

409 McCreary Rd  
Volant, PA 16156

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[1] Research & Occasional Paper Series: CSHE.6.07  
UNIVERSITY OF CALIFORNIA, BERKELEY  
<http://cshe.berkeley.edu>

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