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State Board of Education ATTN: James Buckheit, Executive Director 333 Market St. Harrisburg, PA 17126-0333 Re: Proposed Chapter 4 Regulations Graduation Competency Assessments

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2008 JUN 16 PM 4:23

INDEPENDENT REGULATORY REVIEW COMMISSION

Dear Mr. Buckheit:

Paper-and pencil standardized exams are very imperfect measures of a student's knowledge. Students who don't perform well on high-stakes tests may very well demonstrate their knowledge in other ways, such as research papers, portfolios, etc. As an English teacher in a vocational school, the portfolio system of assessment is a more valid form of assessment since it encompasses years of a student's development and does not rely on only one day of assessment, or one form.

Students should not be denied a diploma if they just don't do well on standardized academic tests which are comparing that child to other children from the prior year instead of measuring that child's true growth and knowledge.

Although the proposed regulations allow IEP teams to exempt special education students from scoring proficient to graduate, it does NOT provide for special education students to be exempted from taking the tests. There is too wide a gap between the regular PSSA test and the accommodation form of the test. This does not take into account the wide range of disabilities and can be akin to tormenting a child that is not at that regular level of testing, but as well is not at the extreme low level of functioning. This is too great a disparity that hurts the child's future development, is grossly unfair, and does not take into account the tremendous strides forward in their education that they may have made. The amount of time preparing for these tests alone and taking the tests are taking away the needed time from instruction. Unfortunately our school is structured - so far - that the testing is done during English class by English teachers, even if assisting that specialty teacher. This takes even more time away from English instruction. In some other schools, the testing is done in the morning and those students not tested only arrive for half the day. As more required test areas for PSSA are added, the more time is taken out of regular instruction time for students and more weeks of a school year are devoted to only testing. Perhaps if the various areas were staggered between grades 11 and 12, then this might reduce some of the test taking stress, which lowers scores, that is being heaped on the 11th grade classes.

There are too many unanswered questions about what happens to the student who does not pass at the accepted level. Will they be prevented from going on to college without a high school diploma even if they can pass the college entrance exams? Will they be unable to get a decent job without a high school diploma, even though they have proven over 12 years of education that they reliably came to school every day, reliably did their homework, reliably worked as a team where appropriate, reliably researched and wrote in clear, understandable language? Aside from the disastrous personal cost to the student, what are the costs to the community in coping with these struggling young people?

Lynn Kleinfelter CAT-Pickering English Teacher 610-933-8877, ext.4245 LynnK@cciu.org