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

INDEPENDENT REGULATORY
REVIEW COMMISSION

June 10, 2008

Dr. Buckheit:

Thank you for the opportunity to comment on the proposed Graduation Competency Assessments.

Cost

First, I would ask the Board to consider the costs that will be incurred by the state, as well as local school districts, if this plan were to be implemented. Based on past history, it seems unlikely that local districts can depend on the state to pick up the tab for administering and scoring these tests. In any event, the funds that would be spent on this initiative could be put to more effective use.

Nor is there evidence that consideration has been given to how this would affect the development of school district budgets, particularly in light of the constraints of Act 1. Consider also, the resources in time and energy that every school district would have to divert from other successful programs to this new mandate.

Process

Prior to the announcement of this proposal, there were no opportunities for our school board to discuss the implications of this proposal - nor was our input solicited in any way. What is the urgency? Given the potentially far-reaching implications, the citizens of the Commonwealth should be very concerned with how quickly this is being advanced.

Nevertheless, I have spoken with my fellow board members, who expressed their support for my testimony before the board back in January. As you know, State College is one of the most successful high schools in the Commonwealth.

- We are one of 21 districts in the state to be recognized by U.S. News and World Report, based on three factors of college readiness
- 88 percent of our graduates go on to post secondary education.
- All schools in the district have reached or exceeded federal benchmarks set by No Child Left Behind in 2005 and 2006.
- A high number of our students routinely qualify as National Merit Semi-finalists, with 20 qualifying in 2006.
- We have been named a "Best 100 Communities for Music Education in America" six times out of the last seven years.
- We are one of only 29 districts in Pennsylvania that has sustained the Standards & Poors evaluation as an "outperforming district" for 4 consecutive years.

I say this to emphasize that our district has been very successful in preparing our students for their post high school experience, and yet this proposal is viewed by our district's leaders as not helpful.

In addition, as you know, State College is a University town, but I have yet to speak with anyone at the University who favors this proposal. To date, the development of the GCA has not been a good example of the kind of a partnership and cooperation among educational professionals from all levels - state, local and university - that would best serve the students of this Commonwealth.

Purpose and Value of Testing

Much of our concern about this proposal has to do with the added emphasis it places on high stakes testing, which this proposal is, by any reasonable interpretation. It also demonstrates a lack of understanding about the purpose and value of testing. Standardized tests can certainly help educators identify areas and subgroups where additional focus is needed, as well as help identify those individual students who might benefit from additional interventions.

In that way, exams such as the PSSA certainly provide useful information, but such tests were not designed to determine individual students' readiness for success in college or the workplace. To place so much weight on a test that was designed for an entirely different purpose is both nonsensical and potentially counter-productive.

It also contradicts decades of research that indicate test scores should never be the determining factor in making major decisions about individual students. First, for many students, they are not accurate assessments. A high-stakes test is, by definition, an artificial environment, and therefore a poor predictor of one's ability to perform in the real environment of college or the workplace.

Some students can better indicate their learning through classroom performance or "real-world" demonstrations. This is particularly true for students with test anxiety and learning disabilities, as well as English-as-a-second-language students, whose future would be unfairly and unnecessarily jeopardized.

My remarks in January were addressed to a group of individuals who have clearly demonstrated success in their careers in education. But my question remains relevant: how many of the ten proposed exams could the members of the State Board pass today? And if the ability, or inability, to pass an exam in "Algebra II" has no connection to your current level of "success" - what is the rationale for requiring it of all high school seniors?

One of the reasons for the success of our school district is that, as much as possible, we have tried to avoid teaching to the test. We believe our students are better served by our emphasis on quality instruction and curriculum, and focused intervention where appropriate. It is largely because we are a high-performing school that we have some luxury to let test scores take care of themselves. That is, our students do well on the PSSA exams, in large part, because we do not focus on them.

The more emphasis that is placed on tests, the better students will become at skills that can be easily tested - at the cost of developing important abilities that cannot be measured with standardized tests, such as research, public speaking, laboratory work and critical thinking.

This emphasis is similar to the unfortunate mindset that is behind No Child

Left Behind: we know how to give multiple-choice exams in narrowly focused subject areas, so in the name of accountability, that's what we do. But the focus should be on what's important, not on what is easily measurable. Unfortunately, should this proposal be adopted, it will be years before we realize that nothing meaningful has been accomplished for the students of the Commonwealth.

Unfortunately, the higher the stakes, the more schools will see a need to focus their instruction on these tests. As a result, for many districts this will put at risk the very curriculum - including opportunities for music and art - that will be important to the future success of their students.

Critiques of our national educational system have long observed that the natural enthusiasm children have for school often begins to dissipate when students get to "junior high" (now middle school), and that many students are completely disengaged by the time they reach high school. Why is that? Could it be that this is traditionally the point at which what is being "taught" in the classroom is no longer meaningful and relevant to all students?

There is no quicker way to disengage students from the learning process than to force them to learn, for the sake of a test, something they see as irrelevant and unimportant. What's overlooked is that every minute that students (and teachers) spend memorizing information that will be mostly forgotten by the time the students receive their diploma is time that students could have - and should have - spent learning something more useful to them.

Requiring every student to pass a Chemistry exam in order to graduate from high school makes as much sense as requiring every college-bound student to complete a certification in auto mechanics.

Mission of High School

What we believe to be missing in the governor's proposal is a discussion over how this strategy connects to the fundamental mission of high school. In our view, it seems reasonable that high school should accomplish two broad objectives.

The first objective is what we think everyone needs in order to live successfully in society. This category includes, for example, the knowledge and skills to be an engaged citizen, and the ability to communicate effectively. It perhaps includes knowing how to safely drive a car, the basics of personal finance, and parenting skills.

This approach has long been reflected in the strategic plan of the State College Area School District, which includes the following descriptors of a State High graduate:

- a responsible and involved citizen
- a clear and effective communicator
- a competent problem solver who thinks critically and creatively

A broad consensus has developed among educators and business leaders that the aforementioned skills are a large part of what students will need, and will use, as they move in their careers through multiple employment opportunities, some of which have yet to be created. The continuing challenge for us is to design the appropriate strategies to develop these

skills, and the assessments to know if we've been successful. The GCA proposal fails to address this challenge in any meaningful way.

The governor's proposal also fails to address what should be a second broad purpose of high school: to provide individual students with the opportunity to obtain the specific knowledge and skills that will allow them to be successful after high school. For many - but, importantly, not all - of our local students, this means being prepared to succeed in college. For those students, college prep courses are both useful, and important.

For some students, however, this means being able to take a sequence of courses that will qualify them for admission to a trade school and potentially well-paid employment in a technical career. When would those students find that time if they have to additionally prepare for ten separate graduation exams?

Years ago, State College successfully brought our vocational education program in-house. This had the great advantage of giving our technical students access to our college prep program, as well as giving our "college prep" students access to our technical programs. I mention this because it is already a challenge for the students who have committed to completing a proscribed technical program to put in enough credit hours in order to receive the appropriate certification. How much more difficult would it be for these students if they are also required to take courses to prepare for graduation exams? I cannot over-emphasize this point: our district is committed to the future success of every student, and many of our students would be very much disadvantaged by this proposal.

Our board appreciates the efforts this administration has made in support of early childhood education and classroom technology initiatives. Yet, we believe there are more important places for the Commonwealth to put its resources than GCAs.

Instead, Pennsylvania could follow the example of several states that have begun to align their standards according to the work done by the Partnership for 21st Century Skills. This organization, formed by educators and business leaders, is developing standards and assessments for competencies that include collaboration, innovation, creativity, communication, and critical thinking skills.

The GCA proposal, however, is misguided. It's certainly far too important an issue to be left to administrative edict or to be rushed into without fully addressing the concerns that have been expressed by the people responsible for educating our students each day.

Sincerely,

David Hutchinson,
State College Area School Board

RESOLUTION OPPOSING PROPOSED HIGH SCHOOL GRADUATION COMPETENCY ASSESSMENTS**BY THE BOARD OF DIRECTORS OF THE
STATE COLLEGE AREA SCHOOL DISTRICT**

WHEREAS, the State College Area School District acknowledges and appreciates the steps taken by the Pennsylvania Department of Education to support the efforts of local school districts on behalf of students through the recent Classrooms for the Future, Accountability Block Grants, Project 720, and the Pre-K Counts initiatives; and

WHEREAS, the State College Area School District believes that both state and local education agencies share and are committed to a common goal of preparing all children with the knowledge and skills to be successful in the 21st century; and

WHEREAS, the State College Area School District believes that differing views of competent educators exist on the methods by which student achievement is assessed and are defensible within the profession; and

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.

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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)