

# WARREN COUNTY SCHOOL DISTRICT

CENTRAL ADMINISTRATIVE OFFICES  
185 HOSPITAL DRIVE  
WARREN PA 16365-4885

ROBERT E. TERRILL, ED.D.  
SUPERINTENDENT

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June 16, 2008

Independent Regulatory Review Commission  
333 Market St., 14<sup>th</sup> Floor  
Harrisburg, PA 17101

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INDEPENDENT REGULATORY  
REVIEW COMMISSION

To Whom It May Concern:

The proposal by the State Board of Education in 2007 to develop a set of Graduation Competency Assessments (GCAs) was met with almost universal condemnation. The Warren County School District and the Board of School Directors shares this concern.

A paper and pencil standardized test is a very imperfect measure of what students have learned. Current regulations require each school district and area vocational technical school to create a local assessment system. Local assessments must be aligned with the state academic standards and be used to determine the degree to which students are achieving the standards. (Local assessments may include portfolios and research papers, classroom participation and presentations, projects and assignments, quizzes and exams, scientific experiments, works of art, and musical or theatrical performances.) These types of assessments provide a richer, more accurate and fairer measure of what students know than can a few paper-and-pencil tests. The state should not override these "local assessments" with one-size-fits-all standardized tests, which Pennsylvania has resisted doing for many years. There is still no conclusive research that students are better equipped to face their future by passing competency tests.

Furthermore, denying a student a high school diploma has serious long-term negative effects on that student's life, as well as significant social costs. Before fundamentally altering Pennsylvania's system and structure for earning a diploma, the state must be sure that the change will not unfairly hurt our young peoples' future. It is inappropriate to assume that paper-and-pencil standardized tests are so accurate that students who do not score highly enough should not be able to graduate from high school. Dropout rates have increased significantly in states that have begun to use a high stakes exit exam. There are costs both human and financial, of putting kids out on the street who are willing to come to school, want to come to school and want to do their work, but know they are not going to do well on paper-and-pencil standardized tests. Economically Disadvantaged students, Vocational students and Special Education students are hit particularly hard. If the state truly wants to make a difference in students' lives, funding can be more appropriately allocated to these groups of students.

Pennsylvania schools have grossly different levels of funding available to them. It is uniformly unfair and irrational to make students from low-income, under resourced schools take and pass the same test as students from wealthy, well-resourced schools. It compounds that injustice to make receiving a diploma contingent upon that test. The better answer is to fund the low-income schools adequately, as well as programs targeted to schools at risk. No formal cost analysis of developing, distributing and administering GCA's has been provided, but the minimum costs will affect both state and local taxpayers. Included on the following page is a chart with the estimated cost for the implementation and administration of the GCA's in the Warren County School District.

## ESTIMATED GRADUATION COMPETENCY COSTS

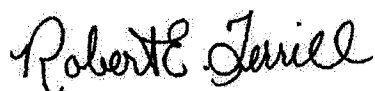
	TOTAL	COST FACTOR	BUILDINGS	DAYS	TESTING PERIODS	NOTES & COMMENTS
Remediation and additional tutoring lost from Accountability Block Grant	\$ 200,000					
Revision of Curriculum & Planned Instruction	\$ 100,000					To prepare for tests, staff & administrative
Full Time Secretary with Benefits	\$ 31,094				3	Required to administer testing program 22,531.60 8,562.01
Professional Development	\$ 75,000					
Shipping, Receiving, Inventorying, Packaging, Securing	\$ 5,400	\$ 450	4		3	Per Secondary Building
Substitute Days	\$ 3,400	\$ 85	4		2	5 Subs for each testing period per building for tests given during school year
Teacher Perdiem for Summer Tests	\$ 6,000	\$ 300	4	5	1	5 days per building
Assessment Perdiem	\$ 6,000	\$ 300	4	5	1	5 days per building
Secretarial Overtime	\$ 2,000	\$ 500	4			10 tests
Aides for Special Ed Students	\$ 3,600	\$ 90	4	5	2	Extended time, accommodation and assistance
Additional security, vaulted safes,	\$ 4,000	\$ 1,000	4			Secure and maintain tests
	<b>\$ 436,494</b>					
Intangibles:						
Loss of Instructional Time						Practicing for Tests

The money it would cost to implement GCA's could make a positive difference in students' lives and achievement if it were used for evidence-based programs and initiatives. These could include establishing parental involvement programs, reducing class sizes in the early grades, funding transition programs to help students move from elementary to middle school and from middle to high school, providing safe, professional working conditions for teachers and students; instituting funding equity; or other evidence-based initiatives.

The Warren County School District is in agreement with the Pennsylvania Department of Education in the fundamental belief that is driving this initiative and has a Board goal aligned with PDE's focus: **The Warren County School District will, by August 2008, develop, fund and implement a continuous improvement plan for academic excellence using multiple criteria to evaluate and improve individual student performance.** We believe that the solution to this problem provided by PDE, the GCA's, is not the appropriate solution, but we are willing to work with PDE and other school districts on a more appropriate solution that will benefit our students.

The education of our students is of paramount importance. I thank you in advance for your careful time and consideration of this matter.

Sincerely,

A handwritten signature in black ink that reads "Robert E. Terrill". The signature is written in a cursive, flowing style.

Robert E. Terrill, Ed.D.  
Superintendent

Enc: Resolution Opposing Graduation Tests

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