



BIG SPRING SCHOOL DISTRICT

Office of the Superintendent of Schools

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June 12, 2008

INDEPENDENT REGULATORY
REVIEW COMMISSION

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

Dear Jim,

I am writing in reference to the proposed revisions of the Chapter 4 regulations to include the addition of Graduate Competency Assessments (GCA's). I understand the State Board is accepting comments on the proposal until June 16, 2008, so I will try and summarize my points concisely as I'm sure you are in receipt of numerous communications on this matter.

First, allow me to give you a brief summary of my experience within a GCA climate. Prior to coming to Pennsylvania as an administrator, I spent the first nine years of my career in Virginia as a teacher and administrator. Virginia has roughly ten years of experience with end of course exit exams and a system that supports this sort of graduation accountability.

Based on my experience within an exit exam culture I would like to first outline my support for this endeavor:

1. I adamantly endorse the concept of accountability via periodic assessment of achievement. This system of accountability needs to be based on known expectations which in this case would be the Pennsylvania Academic Standards. These expectations should translate into a testing blueprint which equates to our current eligible content that is available for the PSSA.
2. I am in full support of assessments which include selected response (multiple choice) and constructed response (open-ended). A test constructed solely of selected response questions can never be a true measure of achievement.
3. Exit exams/GCA's that are given at the end of instructional calendar periods are most advantageous. The test can then be utilized as a final exam immediately following course completion. Please keep in mind the various instructional class schedules that exist throughout our high schools and middle schools in Pennsylvania. Schedules in Cumberland County alone include traditional year long classes, extended block classes which end in January and June, and extended trimester courses that end in November, February, and June. Due to these unique scheduling options which are set by local school boards, districts will need a flexible testing period that includes as many as five testing opportunities per year.

4. I support the variety of assessments across subject area's that requires students to engage in challenging content in math, science, social studies, and English.
5. I appreciate the flexibility of the proposal that allows students to retake only the portion of the assessment where they did not display mastery. This will create an opportunity to focus specific intervention efforts on the content not mastered.
6. Lastly, I support the use of Advanced Placement and International Baccalaureate exams in lieu of GCA's to avoid excessive testing. Also be aware that the International Baccalaureate program is offered at very few school districts throughout the state and the limited number of students afforded this option will limit this exception.

I would now like to address some critical components that I believe need to be addressed in order to solidify the GCA proposal to make it more student-focused while ensuring the educational credibility in the proposal. Moving forward with the current proposal without inclusion of the following components will result in a GCA environment open to litigation from a variety of constituents.

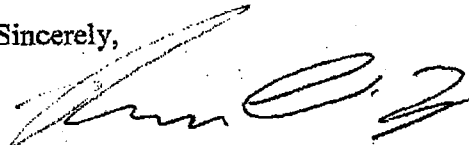
1. The utilization of current technology needs to be a strong focus of the RFP being solicited from testing vendors. Immediate feedback from the assessment should be the norm not the exception. This will prove critical in allowing school districts the potential to provide the necessary interventions for students who have not met proficiency.
2. As noted prior, there must be flexibility incorporated into the testing window to allow for at least five testing windows per year.
3. The state of Virginia offers differentiated diplomas within their assessment system. A differentiated system will be critical for our system in Pennsylvania. Differentiation does not equate to lowering achievement standards, but it does allow for a differentiated accountability system based on student's intellectual ability and various domains of aptitudes such as the ability to work with one's hands, or the ability to problem solve. Since each student brings unique gifts to our buildings on a daily basis, I am very much opposed to a one size fits all method of assessment. The Governor and Secretary of Education's goal to prepare all students to be either college or career-ready can best be served if the National Occupational Testing Institute (NOCTI) assessments would be accepted in lieu of six separate GCA's. Career and Technical Education School students, as well as vocational students within comprehensive high schools, who complete their vocational programs and pass the NOCTI are most certainly career-ready. The NOCTI would be much better suited as a measure of a vocational students' program achievement. The NOCTI promotes challenging standards in both academic and vocational reading, writing, and math. This assessment serves as a nationally validated tool recognized by trade and industry. The NOCTI requirement would allow Pennsylvania to differentiate our achievement requirements in a method that encourages students to follow pathways within their vocational aptitude and interests. Do not implement a system that does not promote this sort of differentiation that is vital to our society.
4. An Individual Education Program (IEP) must continue to be a path to graduation for those students that qualify. All students should be afforded the opportunity to enroll in courses for which a GCA is the final exam, but in the case of students with IEP's, successful completion of the IEP should supercede all other requirements for graduation.

5. Lastly, the PSSA should cease to exist at the eleventh (11th) grade. Successful completion of the GCA's would serve as graduation criteria for those students without an IEP and those not involved with vocational education. Continuance of the PSSA at the eleventh (11th) grade perpetuates a testing environment that draws far too much instructional time away from our high school students at a time frame that could be years removed from the assessed subject areas.

I ask that you look closely at those twenty two states that currently offer an exit exam format. The programs that are most successful are those that allow for a differentiated diploma based on student's strengths and needs. Virginia's program has flourished under a three tiered diploma system and their achievement scores have steadily improved. A one size fits all philosophy of assessment will only set our state back in our quest to better serve all students.

Thank you for your time.

Sincerely,



Richard W. Fry
Superintendent of Schools

RWF:cg

cc: Big Spring Board of School Directors
Big Spring Administrative Team
Senator Patricia Vance
Representative Will Gabig
Stinson Stroup, Executive Director Pennsylvania Association of School Administrators
Tom Gentzel, Executive Director of PSBA

