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Buckheit, James

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From: Beverly Kressley [kressleyb@parklandsd.org]**Sent:** Monday, June 16, 2008 9:56 AM**To:** j buckheit@state.pa.usINDEPENDENT REGULATORY
REVIEW COMMISSION**Subject:** GCA Information

Dear Mr. Buckheit,

This is a copy of a paper written by our high school principal for a course in his doctoral program. The content of this paper encapsulates some of our concerns regarding the GCA mandate. We agree with the position of both the PSBA organization and the PASA organization. The cost alone should defer this program from occurring at a time when we are not adequately funding education in Pa. I strongly recommend that PDE enforce the rules that exist currently and focus remediation efforts on school districts that are not following the regulations and / or not achieving AYP levels. Thank you.

Louise E. Donohue, Ed.D.
Superintendent of Schools
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6/16/2008

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Graduation Competency Assessments

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Ethics and Social Responsibility

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April 27, 2008

Introduction

Introduction

Pennsylvania, like many other states, is dealing with issues associated with the globalization of the U.S. and the resulting implications for business and education. The days when workers enjoyed a career in a single industry, with a single employer, are in the past. Instead, today's workforce is competing for jobs with qualified applicants from around the world. Jobs originally considered to be fixtures within America have moved overseas, where work can be acquired less expensively with similar results. The Pennsylvania Department of Education (PDE) recommends changing the state's graduation requirements to meet the needs of today's global marketplace.

The Pennsylvania State Board of Education is proposing regulations that would revise high school graduation requirements in an effort to establish a consistent statewide measurement of the minimum knowledge and skills that a public high school diploma signifies. Accountability for educational practices and student achievement is necessary for improvement (Albrecht & Joles, 2003). The ethical concern regarding this proposal is the problem of high stakes tests being the determining factor in making major decisions regarding students.

Current Pennsylvania Graduation Requirements

Since 1999, students in Pennsylvania have been required to demonstrate achievement of the state standards by scoring proficient or above on the 11th grade Pennsylvania System of School Assessment (PSSA) exams, or a local assessment that is aligned to the state standards, in order to graduate from high school. Other graduation requirements, such as course requirements, grades, and graduation projects are decided by local school districts. These decisions are adopted and approved by local school boards.

Currently, the Pennsylvania State Board of Education requires students to be proficient on the Pennsylvania standards prior to graduation. The regulations allow two methods of showing proficiency: demonstrating proficiency on the PSSAs or on an equivalent local assessment. PDE contends that this local assessment does not ensure a common, statewide graduation standard.

PDE Proposal

The State Board of Education's proposal will require that every Pennsylvania high school student demonstrate proficiency in the state academic standards in reading, writing, mathematics, science, and social studies in order to graduate from high school beginning in the 2013-2014 school year. Proficiency could be assessed through one or more criteria. Vogler contends that a formula for achieving educational accountability should include designing a statewide curriculum for each content area, having teachers teach to the standards of the curriculum, and mandating statewide tests to assess student knowledge (2006).

Graduation Competency Assessments (GCAs) are one recommended method for gauging proficiency. GCAs are statewide end-of-course high school exit exams that are aligned to state standards in reading, writing, mathematics, science, and social studies, and would replace current final exams utilized in schools throughout the state (Governor's Commission on College and Career Success, 2006). Nontraditional exit examinations are increasing as more states are adopting testing requirements for graduation (Gaumer Erickson, Kleinhammer-Tramill, & Thurlow, 2007).

GCAs would provide school districts with timely information on student progress towards proficiency. Because the tests can be taken as soon as the content area is mastered, most students will not have to wait until 11th grade to take them. As a result, test results can serve as

an early indicator of progress. Deficiencies can be identified and addressed in a timely manner with tutoring and other interventions.

PSSAs (administered in 11th grade or the 12th grade retest) are currently used to establish proficiency in the state academic standards. GCAs provide a more in-depth assessment in each subject area than a single comprehensive exit exam. Comprehensive exams, such as the PSSAs, test students on a range of subjects, and due to time constraints, include relatively few questions on each subject. In contrast, GCAs provide schools with the opportunity to test students on a range of subjects individually, allowing for more in-depth examination of student performance.

GCAs will be designed so that practitioners in Pennsylvania can grade them. PDE recommends that GCAs be developed at the state level, so the state can ensure uniformity across the school districts (Governor's Commission on College and Career Success, 2006, December). Additionally, PDE recommends that the exams be graded regionally within Pennsylvania so that teachers are familiar with student performance in their own district and in surrounding districts as well (Governor's Commission on College and Career Success, 2006, December).

Locally administered, validated criterion referenced assessments, comparable to the GCAs, are also proposed as a means to establish proficiency. These local assessments must be independently and objectively validated by a vendor selected by the individual school from a list of approved vendors published every five years by the Secretary of Education and approved by the State Board of Education (Governor's Commission on College and Career Success, 2006, December). Advanced Placement (AP) or International Baccalaureate (IB) exams that include academic content comparable to the appropriate GCA (with a proficient score established by the Secretary of Education) may also be utilized to demonstrate proficiency on state academic standards (Governor's Commission on College and Career Success, 2006).

High-Stakes Graduation Test

PDE contends that GCAs are not high-stakes graduation tests. The State Board of Education proposes a total of ten GCAs to be developed. These assessments include three in mathematics (Algebra 1, Algebra 2, and Geometry), two in English/language arts (literature and composition courses), three in social studies (American History, World History, and Economics and Government), and two in science (Biology and Chemistry) (Governor's Commission on College and Career Success, 2006). Under PDE's proposal, students would need to demonstrate proficiency on the two English/language arts GCAs, and any two mathematics GCAs, one of the science GCAs, and one of the social studies GCAs in order to graduate.

PDE maintains that this proposal does not overburden students with more tests (Governor's Commission on College and Career Success, 2006). All but one of the options described in the proposal for demonstrating achievement of the academic standards already exists. Students already take the PSSAs, the local assessments, and (for certain students) AP or IB tests. GCAs are the only new test within this proposal. GCAs are intended to replace a final exam.

Benefits of GCAs

PDE also believes that well-designed GCAs offer many benefits to students. For example, GCAs place assessment closer to the point of instruction and create a sense of relevance and progression for students (Governor's Commission on College and Career Success, 2006). Since GCAs assess a smaller body of knowledge at one time, students can take GCAs earlier and then have multiple opportunities to take these assessments and pass them. PDE believes that GCAs will provide results to teachers earlier so that teachers and parents can

identify specific areas of student weakness which would allow targeted remediation to occur earlier (Governor's Commission on College and Career Success, 2006).

GCAs provide an excellent tool for credit recovery and completion for students who have failed to graduate and are returning to complete their high school education. The results of GCAs would become part of the student's academic record. Therefore, if a student must leave high school for any reason or transfer to another high school, these exams will indicate which subjects a student has mastered and which areas require additional work.

PDE contends that this new proposal does not eliminate local control over graduation and the awarding of diplomas (Governor's Commission on College and Career Success, 2006). The proposal leaves in place the core requirement that, in order to graduate, students must demonstrate achievement of the state standards by scoring proficient or above on the 11th grade PSSAs, or on a local assessment aligned to the state standards.

This proposal provides districts with additional options for students to demonstrate achievement through the GCAs or AP/IB tests, and establishes how a local assessment can be valid when aligned with the state academic standards. Other graduation requirements such as course requirements, grades, and graduation projects would continue to be controlled by local district policy.

Other States Experience with Exit Exams

Not every state requires students to pass state exit exams in order to receive a high school diploma. However, the trend appears to be toward adopting a competency standard as an additional requirement to award a diploma. States utilizing exit examinations do so to fulfill the No Child Left Behind (NCLB) testing requirements.

Virginia utilizes a system of academic supports and end of course exams that is comparable to the GCAs that are being proposed in Pennsylvania. Virginia initiated these exams in 1998. The Virginia accountability system creates curricular standards for their school districts to follow and consequently student achievement has improved (Defur, 2002).

States that have not seen much success from requiring end-of-course exams often fail to design appropriate supports for students and schools. As in Pennsylvania, the goal of other states was to ensure that every student graduated from high school ready for success in either college or career.

Opponents View of GCAs

Opponents of GCAs within Pennsylvania include school officials, student advocates, and others who continue to raise concerns about the cost and implementation of the PDE proposal. Another key concern is that the plan removed the option for school districts to use local assessment strategies as graduation requirements. When a single assessment measure can determine access to postsecondary social, educational, and career and technical opportunities, these high-stake assessments discriminate against students with identified learning disabilities (Albrecht & Joles, 2003).

The State Board of Education claims that Pennsylvania school districts are graduating thousands of students who did not score proficient or above on the PSSA test. The assumption was made that these students are not properly prepared for college or careers and that a statewide graduation test is the only way to ensure that high school diploma from a Pennsylvania high school has any meaning.

The Pennsylvania School Boards Association (PSBA) refutes this claim, and argues that no research is available to show that students who score below proficient on the PSSA are

unsuccessful in college or in the workforce. One concern is that research indicates that students who do not receive a diploma experience negative consequences such as limited college admission, ineligibility for financial aid, and denial of employment (Gaumer Erickson, Kleinhammer-Tramill, & Thurlow, 2007).

Concerns with the Local Assessment Option

The State Board of Education included an option that allows schools to use a local assessment, but this option is expensive and filled with obstacles that it is not likely to be selected. In the PDE proposal, schools may not use an assessment system that includes a combination of assessment strategies. Instead, the local assessment must be an exam that is simply another type of GCA.

Another obstacle is that schools will have to pay to have each local test validated by a state-approved vendor. Each test will have to be re-validated every five years. Districts must have a policy for annually updating assessment items. If the school makes material changes to any test, a new validation is required.

Furthermore, the local assessments must be comparable to the GCAs as well as national and state criterion-referenced tests. The level of difficulty must be greater or equal to the GCAs. Cut scores must be greater than or equal to the GCAs. It will be too expensive and too burdensome for school districts to develop local assessments.

Concerns with Cost

Overall, opponents contend that costs will be incurred by the state and the local school districts in order to implement this GCA plan associated with revised local assessments. No cost analysis has been offered, and Pennsylvania already comes up short in funding public education. Questions remain regarding how the state will pay to develop, validate, and score the GCAs.

PDE's proposal requires school districts to absorb many of the new costs, including test preparation and remediation, professional development, enlarging and staffing summer school, and communication to students, parents, and communities. Currently, schools have limited resources to fund these potential new costs.

Concerns Regarding Narrowing the Curriculum

This proposal calls for PDE to develop a model curriculum in each content areas assessed by the GCAs. This means that each district would offer the same courses to all students in a similar manner. This curriculum cannot be considered voluntary if all students must pass the same courses regardless of their career pathways. This solution does not recognize that students select courses of their interest. Not every student desires to enroll in chemistry for example, and these students are less likely to be successful on GCAs due to a lack of interest.

In eliminating alternative tracks other than college preparatory, the focus of the delivered curriculum becomes increasingly narrow. Vocational students' education would be disproportionately harmed by this plan. Currently, students in career and technical centers spend much of their academic time in lab settings learning their professions. Subjects are then integrated throughout their vocational courses, delivering a much different curriculum than that received in the college preparatory classes.

Concerns with Testing Implementation

With PDE's proposal, Pennsylvania students would be required to take the PSSA assessments to fulfill the criteria defined under NCLB, and pass a minimum of 6 of the 10 GCAs or local assessments. Additionally, they would be tested in each of the academic standards not tested by the PSSAs, GCAs, or local assessments. Although a combination of tests may be

submitted in order to graduate, students would still have to take the PSSAs and, most likely, the GCAs in order to know how to count their scores.

Having the GCA scores only days prior to graduation does not afford students enough time to re-take the test or to re-configure their other scores in order to graduate on time. Many of these students may have already been accepted to college or have other plans that cannot be changed.

Student motivation with the PSSAs has been a concern since the inception of the assessments. Districts throughout Pennsylvania struggle to get students to take the PSSAs seriously. However, PDE views this proposal of making the PSSAs and GCAs a graduation requirement as motivation for the students.

Concerns with High-Stakes Tests

Research is rich with reasons why test scores should never be the determining factor in making major decisions about students. It is clear that test-based decisions do not accurately assess many students. Vogler (2006) contends that there is a large amount of ambiguity regarding the impact state testing has on instructional practices. Some students may successfully demonstrate learning through classroom performance, but do not score well on tests. Often, students with test anxiety and learning disabilities as well as students whose first language is not English, struggle with standardized testing.

Standardized testing also reinforces inequity. School characteristics affect the probability of student success on standardized tests (Borg, Plumlee, & Stranahan, 2007). Many students, particularly those of low socio-economic status, minorities, English language learners, and the disabled, attend under-funded schools or lack access to high quality educational programs

necessary for their success. Consequently, youngsters who do not obtain a diploma are more likely to be unsuccessful in their future.

High-stakes testing also encourages teachers to “teach to the test”. As Brimijoin states, high-stakes testing creates conflicts between teachers’ perceptions of best practices and how teachers should address accountability pressures imposed upon them (2005). When the stakes are more significant to schools, districts, and students, the focus of instruction is toward the test. This results in subjects being dropped or eliminated from course offerings. Important skills, such as writing research papers, public speaking, or conducting laboratory experiments, cannot be assessed with standardized tests.

My Reflection

The Governor recommended that PDE propose the best means of aligning GCAs with the requirements of NCLB, particularly “Adequate Yearly Progress” (AYP), to ensure that Pennsylvania has a coherent system of assessment from both a state and federal perspective. The rationale for initiating GCAs is, in part, based upon the data regarding the discrepancy that exists between the number of graduating students and the number of these students scoring proficient on the PSSA. It seems that the unstated conclusion is that too many students are graduating without reaching proficiency on the PSSAs. GCAs are now being recommended as the cure for this discrepancy.

A potential unintended consequence of GCAs is a much larger dropout rate, because students who do not pass all GCAs and do not meet proficiency on the 11th grade PSSA assessment in both reading and mathematics will have little motivation to remain in school as a senior. Provisions and accommodations for special education students and English as second language students are not adequately addressed within the proposal from PDE.

Another unintended consequence of implementing GCAs is that school districts will also face “missing the mark” on PSSA targets as it relates to NCLB and AYP. When students are permitted to utilize a combination of the GCAs, proficiency on the PSSAs or the local assessment as their graduation requirement, and they have successfully passed their GCAs, high schools will struggle to motivate students to perform during the 11th grade PSSAs. The 11th grade PSSAs will be a meaningless exercise for many of the most able students. As a result, the PSSAs will not provide a true measurement of students’ mastery of the standards. Moreover, schools and school districts could not only miss the PSSA targets, but may very well fall below previously achieved targets as defined by NCLB for AYP.

PDE’s assumption, that the local assessments do ensure a common statewide graduation standard, is not supported with direct evidence. Replacing local control implies that schools are not meeting the standards as defined in Chapter 4 of Pennsylvania Public School Code, and suggests that all 501 school districts in Pennsylvania are deficient in the implementation of local assessments. Our school district shares an educational philosophy with our neighboring school districts that the state standards are the minimum we desire our students to achieve.

Management of the proposed GCA process is also a huge issue. Returning assessments in a timely manner is of paramount importance in this proposal, as the calculation of a child’s final grade in a course necessitates including the final examination grade. Computerized assessment or an assessment scored by other electronic means would be the only possibilities. This would impose costs on districts that may not have enough computers to assess all students at once, and would also limit the type of assessment to those that can be readily scored through electronic means. Again, this means another high stakes assessment, similar to PSSA, in which students would have limited means to express their knowledge. This implies that differentiated

assessment is not valuable in assessing student learning, contrary to the beliefs of leading educational researchers.

High performing schools invest much time and resources in crafting high quality mid-term and final examinations for students in courses. Prior to implementing a one-size-fits-all remedy, such as GCAs, it would make sense to evaluate the integrity of current local assessments, mid-term exams, and final exams by performing an audit inclusive of a certification process. By doing this, costs can be controlled with regard to producing and scoring the proposed GCAs, as they may not be necessary for all schools.

If GCAs are approved, I would recommend that GCAs are offered through approved question banks, allowing school districts to administer both mid-term and final examinations. This would mean assessing student knowledge in shorter time periods similar to the time periods of assessment utilized in post secondary education. Questions utilized in the assessment bank should maintain a constant focus, unlike the PSSAs, where questions cover a wide array of topics and targets move. All accommodations currently in place for special education students and English as second language students should be allowable and should be administered at a local level with approved guidelines from the state.

Furthermore, if GCAs are approved, they should be linked to the School Improvement 2 process defined under NCLB legislation. The necessary financial resources to successfully implement this strategy should be fully attached, making this proposal more cost effective, more manageable, and the results more accurately measured. School districts that are not part of School Improvement 2 should be required to submit their local assessments and examinations for state approval as previously referenced. If local assessments are certified by the state, these districts could be allowed to opt into using GCAs as their final assessment to be included in a

pilot study. If the local assessments do not meet state certification standards, then those schools may be required to implement GCAs.

If implementation of this strategy occurs, ninth grade students during the year of implementation should be grandfathered as successful completers of any courses taken prior to Grade 9 in which they passed the local protocols. In some instances, these students are at a disadvantage, taking assessments (GCAs) for courses completed more than one year prior to implementation of GCAs.

While I have serious concerns about GCAs related to management, unintended consequences, accommodations for special education and English as a second language students, and unnecessary costs to the taxpayers, I do still see value in this proposal. If GCAs were to be implemented, I too, would want to create the most successful implementation process that allows for success, and that is why I would recommend a process that is easier to manage and measure.

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