



Pennsylvania School Boards Association

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INDEPENDENT REGULATORY
REVIEW COMMISSION

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PA. STATE BOARD
OF EDUCATION

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

Dear Mr. Buckheit:

The Pennsylvania School Boards Association would like to take this opportunity to submit the attached comments on the proposed regulation to 22 PA Code Chapter 4- Academic Standards and Assessment (regulation #006-312) that essentially would mandate high stakes standardized high school exit exams.

PSBA opposes this proposal on behalf our membership because we believe strongly that an adequate case has not been made for the proposed changes, that the proposal will be harmful to students, that the proposal further erodes local control of education and that the proposal will cost the state and school entities millions of dollars to implement.

Approximately 190 school entities have taken formal positions of opposition with the GCA plan. These are schools that welcome accountability and take great efforts to provide their students with a planned curriculum and multiple measures of assessments so that these students can more accurately demonstrate their proficiency of the state academic standards. While these schools recognize the importance of the PSSAs, they also understand that these standardized pencil and paper tests are just one approach in accurately determining readiness to graduate. Neither the PSSA nor any one measure can predict the future success of an individual student. School districts can provide numerous examples of students who may not have scored proficient on the PSSA but excel in high school classes and assessments and have succeeded in colleges throughout Pennsylvania and the United States.

Schools currently are required to align their local assessments with the state academic standards, and the assessment systems must be designed to include a variety of assessment strategies that may include tests, written work, scientific experiments, works of art, musical or theatrical performances, and other demonstrations or projects by students. The results of these assessments are used to help identify students who need assistance, and districts currently provide remediation to students who do not score well on the PSSA or local assessments. While the GCA proposal technically would allow the continued use of local assessments, these would have to be validated by a state-approved company as alternate versions of GCAs. Testing experts have noted that, as a practical matter, it would be cost prohibitive for districts to undertake the development of such assessments on their own. Schools no longer could use assessment strategies encompassing a body of student work to determine mastery of the state academic standards, only a paper and pencil test would be allowed. The proposed verification creates so many obstacles and additional costs to districts that it becomes a false option.

Mr. Jim Buckheit
State Board of Education
June 13, 2008
Page 2

808

Regarding costs, we question the State Board's contention that implementation of the GCA proposal will add no costs to local school district budgets. The fact is, the full implementation of this proposal will create a large, long-term financial impact on state and local budgets. Contrary to what the State Board contends, the GCA proposal will require school districts to absorb many new expenses. These costs include remediation, expanded summer programs, additional recordkeeping, development and validation of local assessments, curriculum revision/alignment work, possible need to add new courses or change alignment of course offerings; time spent for curriculum alignment to GCAs; staff time for professional development; staff/scheduling/remediation for AVTS students to take these 10 courses; staff/scheduling/remediation for students with disabilities who would not be exempted by their IEP to take these 10 courses, to cite just a few examples.


PSBA believes that all students should be proficient in the state's academic standards in order to graduate. A new set of tests is not needed to accomplish this goal. Rather, PDE and the State Board should enforce the current regulations that allow students to graduate based on a proficient score on the PSSA or by passing a local assessment aligned to state academic standards and the PSSA.

The dollars targeted to the implementation of this proposal can be better spent in identifying and sharing school entities' best practices on the development and alignment of local graduation assessments, technical assistance for school districts to implement those best practices and further assistance with instructional quality.

PSBA is not alone in raising concerns with this proposal. A Joint Statement of opposition to the GCAs has been endorsed by 24 organizations (including PSBA) representing hundreds of thousands of Pennsylvania citizens including parents, teachers, students, children with disabilities, gifted children, members of minority groups, school principals, school superintendents, and school board members. A copy of this statement is attached

PSBA believes that all students should graduate from high school competent in state academic standards. Further, we believe that this can be accomplished through the use of existing state and local assessments and other useful measures of student performance, not only through the use of state assessments alone.

Sincerely,



Thomas J. Gentzel,
Executive Director

JOINT STATEMENT IN OPPOSITION TO GCAs

We, the undersigned organizations, representing hundreds of thousands of Pennsylvania citizens including parents, teachers, students, children with disabilities, gifted children, members of minority groups, school principals, school superintendents, and school board members, oppose regulations proposed by the State Board of Education that essentially would mandate high stakes standardized high school exit exams. The Graduation Competency Assessment (GCA) proposal would result in denial of diplomas to students if they do not score "proficient" on statewide standardized tests. Our concerns include:

- 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, of which local graduation assessments are a part. Local graduation assessments must be aligned with the state academic standards and be used to determine the degree to which students are achieving the standards. Local assessment systems, including the local graduation assessments, must include a variety of assessment strategies, including portfolios and research papers, presentations, projects and assignments, results of 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.
- While the proposal continues to allow the use of local assessments for graduation purposes, it creates numerous costly barriers in the name of test "validation" that would be a disincentive for most school districts to continue using local graduation assessments. The proposal also allows the use of Advanced Placement and International Baccalaureate exams as a graduation test; however, these programs are limited in their availability to Pennsylvania high school students. Therefore, the only option for high school graduation for most students under this new proposal would be scoring proficient on the PSSA or on six out of 10 GCAs. For all practical purposes, there would be no local option for students to graduate.
- If the state has concerns about local assessments, the proper first step would be to analyze local graduation assessments. Local assessment systems may be, in fact, a better measure of students' knowledge than the PSSA. It is premature to impose a new set of standardized tests on students in 501 school districts prior to a formal evaluation of the local assessments they currently utilize.
- 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 people. It would be appropriate to first audit the local graduation assessments of various districts to determine why some students do not score "proficient" on a PSSA test but do show, through local assessments, that they have mastered the curriculum. 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.

- The differences between the number of students who score “proficient” on the PSSA and the number of students who show they are “proficient” through local graduation assessments must be considered in light of the fact that the PSSA was not designed to be an exit exam. In fact, thousands of students who scored “basic” on the PSSAs have gone on to college without any need for remediation. Some GCA proponents say that students who do not score “proficient” on the state PSSA cannot even read at grade level. That is not what a basic score on the PSSA means. Such a claim has never been supported by any data and has, in fact, been disproved. The state’s own PSSA validity study (HumRRO), which reviewed students at three Pennsylvania universities, shows that several thousand students in those universities who scored basic on the PSSAs, in fact, went on to college with no need for remedial classes. Among all three universities, 58.7% of students who scored basic or below on the PSSA tests took at least the standard level Math or English college course. That is, most students who “failed” the PSSA enrolled in nonremedial college courses in the same subject area(s) in which they failed. (Andrea L. Sinclair and Arthur A. Thacker, (2005) Relationships Among Pennsylvania System of School Assessment (PSSA) Scores, University Proficiency Exam Scores, and College Course Grades in English and Math, (HumRRO FR-05-55) Tables 16, 17, 18, 19, 20.)
- Dropout rates have increased significantly in states that have begun to use a high stakes exit exam. (Warren, J.R., Kulick, R.B., & Jenkins, K.N. 2006. High school exit examinations and state-level completion and GED rates, 1975 through 2002. *Education Evaluation and Policy Analysis*, V28, N2: 131-152) (Dee, T.S. & Jacob, B.A. 2006. Do high school exit exams influence educational attainment or labor market performance? Social Science Research Network, April) (Radcliffe, J. & Mellon, E. May 12, 2007. TAKS tests cost 40,000 Texas seniors chance to graduate, Houston Chronicle.) (FairTest Examiner. January 2007. Exit exam update: WA, TX, CA, AZ, MA). 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. Minority and ELL students have been especially hard hit.
- Career and technical education students would be disproportionately harmed by the GCA proposal. Students in career and technical centers spend much of their time learning specific professions. While math content is woven through some vocational courses, it is in a different format than is provided in an academic Algebra II class. Career and technical education students take professional exams in the areas in which they have been trained. Yet, both the student who takes a college preparatory, academic Algebra II class, and the student who learns the practical application of Algebra II concepts in his or her profession would be judged on the same academic Algebra II test.
- No formal cost analysis of developing, distributing, and administering GCAs has been provided, but it is clear that the minimum costs will run into the tens of millions of dollars. In his 2008-09 budget proposal, Governor Rendell proposed spending \$15 million for the development of three of the 10 required GCAs. These costs will increase significantly because the GCAs must be administered at least three times per year, which will require three different versions of each test. The expense is even greater when the cost of providing remediation in the various components of all of the tests is added. In the end, hundreds of millions of dollars are at stake -- all for a type of testing system that

has not been shown to improve student achievement but has been shown to have negative effects on student dropout rates, on curriculum offerings, and on the success of minority student populations.

- No matter what financial outlay it would take to develop and implement GCAs, that money could instead be used to make a positive difference in students' lives and achievement -- i.e. it could be 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 undersigned organizations respectfully request that the Pennsylvania General Assembly reject the proposed Graduation Competency Assessment regulations:

**American Federation of Teachers
Pennsylvania (AFT-PA)**

The ARC of Pennsylvania

**Autism Society of America/PA
Government Relations Work Group**

**Disability Rights Network of
Pennsylvania**

Education Law Center

**Learning Disabilities Association of
Pennsylvania (LDAPA)**

**Mental Health Association in
Pennsylvania (MHAPA)**

**NAACP - Pennsylvania State Conference
of NAACP Branches**

**National Center for Fair & Open Testing
(FairTest)**

**Pennsylvania Association of Agricultural
Educators (PAAE)**

**Pennsylvania Association of Career and
Technical Administrators (PACTA)**

**Pennsylvania Association of Elementary
and Secondary School Principals
(PAESSP)**

**Pennsylvania Association for Gifted
Education (PAGE)**

**Pennsylvania Association of Pupil Services
Administrators (PAPSA)**

**Pennsylvania Association of Rural and
Small Schools (PARSS)**

**Pennsylvania Association of School
Administrators (PASA)**

**Pennsylvania Association for Supervision
and Curriculum Development (PASCD)**

**Pennsylvania Middle School Association
(PMSA)**

**Pennsylvania Psychological Association
(PPA)**

Pennsylvania PTA

**Pennsylvania School Boards Association
(PSBA)**

**Pennsylvania State Education Association
(PSEA)**

**Pennsylvanians for the Education of Gifted
Students (PEGS)**

Philadelphia Student Union

List is current as of May 29, 2008

808

PSBA LEGISLATIVE ADVOCACY CONFERENCE

Graduation Requirements:

Local assessments & the GCAs

MAY 2008



Pennsylvania School Boards Association

Executive Summary

Like other states, Pennsylvania's system of how it educates and assesses students was changing in the 1990s. In 1993, the State Board of Education eliminated high school course and credit requirements in grades 9-12 and replaced them with 56 student learning outcomes. A new effort in 1997 to adopt performance-based academic standards with the stated purpose of connecting what is learned in school with the skills that are critical to success in life replaced the earlier outcomes proposal.

Along with how students were taught, Pennsylvania's assessment system also was undergoing changes. The Pennsylvania System of School Assessment, which debuted in 1991, originally was intended to measure the quality of a school's instruction. In 1999, after the state's academic standards were established, the PSSA was redesigned to measure both school and individual student achievement on the state academic standards. That same year brought changes to the state's graduation requirements. The major feature of those new requirements required students, beginning in 2002-03, to demonstrate proficiency in reading, writing and mathematics on the PSSA or local assessments aligned with state academic standards and state assessment at the proficient level or above to graduate.

At the time, there was some question as to how local graduation assessments were to be compared to the PSSA. The State Board believed that differences in success rates between the local graduation assessments and the PSSA would indicate that changes would have to be made to the assessment system.

The current Graduation Competency Assessment proposal represents a plan for such change. It would allow the commonwealth to develop 10 new GCA tests that could be used as graduation requirements in lieu of a proficient score on the PSSA. The proposal also allows the use of a validated local assessment and Advanced Placement and International Baccalaureate examinations as well.

PSBA believes that proponents of the proposal assert that change is needed because the current graduation assessments being used by school districts lack rigor and do not adequately measure a student's proficiency in the state's academic standards. PSBA strongly refutes this assertion, because there is nothing to prove its validity and because results from a PSBA survey on such assessments show that school districts are indeed following the intent of the current regulations in a variety of ways.

Additionally, PSBA believes that the GCA proposal infringes on areas that traditionally have been areas of local control, will be harmful to students and will result in significant costs to school districts and the commonwealth.

local assessments. If it becomes apparent that large numbers of students not achieving at the proficient level on state assessments are deemed proficient by local assessments, regulation and administrative review will become important. Until then, the board does not feel the extra administrative burden for schools and the department is warranted.¹ (*Emphasis added*)

In July of 2004, the State Board, sensing that there were large numbers of students graduating without scoring proficient on the PSSA, proposed revisions to its Chapter 4 (Academic Standards and Assessments) regulations. This proposal would have required school entities using a local assessment to determine graduation to submit an annual report to the Pennsylvania Department of Education certifying the alignment of the local assessment to the PSSA. The school also would have had to provide specific data to PDE to support the certification. PDE would have made an inference that the local assessment was not aligned with the PSSA or the PSSA proficiency levels if more students achieved proficiency on the local level than on the PSSA. The proposal also would have allowed PDE to withhold state funding from any school district that used a test that was not validated or where alignment was not certified by PDE.

Responding to this plan, PSBA joined organizations representing education professionals including vocational-technical school administrators in issuing a joint statement opposing the plan. Many of the arguments used then are similar to those being used in the current debate over Graduation Competency Assessments, namely, that the continued use of local tests would be costly because of additional steps mandated to require the alignment or validation of those tests and the impropriety of asserting that a score other than proficient on the PSSA renders a student as not having the proper skills and knowledge needed to graduate. Additionally, PSBA and the organizations involved asserted the importance for students to graduate with a knowledge and understanding of the state's academic standards and acknowledged the importance of PDE initiatives, which at the time included PAGE 1, Project 720 and dual enrollment, in assisting districts with making sure students were ready to graduate by the end of their senior year. Further, the organizations stated that they did not believe that achievement could be measured in only one way, through the PSSA, and that if students can consistently demonstrate an understanding of the state academic standards through a local assessment system, they should be permitted to graduate.

The Independent Regulatory Review Commission sided with PSBA and the other opposing organizations. In its comments on Jan. 4, 2006, the commission cites that the preamble to the section of the proposal relating to local assessment systems "considerably understates the change in requirements." It adds "[T]he proposed rulemaking does not contain sufficient information to fully evaluate its requirements and impact. The regulation imposes new requirements for school entities to monitor, analyze and report on the progress of their students. If these are not satisfactory, the secretary will take the devastating action of withholding state appropriations. We will evaluate the board's response to determine if the Regulatory Review Act criteria of economic and fiscal impact, feasibility and clarity have been met."² The State Board subsequently withdrew its proposal.

The proposal currently being debated can trace its roots to two major events, Pennsylvania's involvement with the American Diploma Project, a high school reform movement designed by

¹ 29 PA Bulletin 399 (January 16, 1999)

² Comments of the Independent Regulatory Review Commission on State Board of Education Regulations #6-295 (IRRC #2499); Academic Standards and Assessment, Jan. 4, 2006

“It is the commission’s belief that the 12 recommendations provide a roadmap that will enable policymakers, high schools, postsecondary institutions, employers, parents and students to confront the challenge of redesigning the Pennsylvania high school experience head on and emerge with the high-quality workforce that our economy demands,” the panel wrote.

The recommendation that specifically addresses the GCA proposal states:

Require all Pennsylvania high school students to demonstrate proficiency on Pennsylvania’s academic standards to graduate. Students can demonstrate proficiency by scoring proficient or advanced on the 11th-grade PSSA or by passing a series of state-developed Graduation Competency Assessments.

The commission recommends that the state require all students to take a progressive series of Graduation Competency Assessments in math (including algebra II), English/language arts, laboratory science, and civics (American history, economics and government).

The report calls for removing the current option for school districts under state regulations (Title 22, Chapter 4) to use either the PSSA or a local assessment to determine student proficiency as a graduation requirement. According to the report, “the local determination of equivalency does not ensure a common, statewide graduation standard.” Instead, the commission recommends replacing the local assessment option with a series of Graduation Competency Assessments that all students would be required to take.

“While this recommendation provides two pathways for every student to reach graduation – proficiency on the 11th-grade PSSA or passage of the GCAs – the Graduation Competency Assessments must be used by every district with every student. ... Removing the local assessment option and rollout of initial GCAs should begin as soon as possible.”

Following these two occurrences, in March 2007, the state announced that it would be considering a plan to revise Chapter 4 to require all students to demonstrate proficiency on the 11th-grade PSSA or pass a series of Graduation Competency Assessments developed by the state in order to graduate. A few months later, in May 2007, the State Board released its own report titled “High School Graduation Requirements and the 21st-Century Economy” that supported the commission report. At the same time, the board issued its draft plan for Graduation Competency Assessments. With only a description of how the plan might be implemented, the board began to seek public input on the concept.

The board conducted four public roundtable sessions from July through September 2007 to gather input on the proposal from school directors, superintendents and principals, career and technical center administrators, teachers, special education advocates, parents and others. The plan was not well received as these groups voiced opposition to the proposed new series of high-stakes tests. However, it was clear that the board remained determined to move forward with the plan. In December, the State Board issued a revised version of its plan and conducted three additional roundtable sessions. On Jan. 2, 2008, the State Board released a formal proposal to amend its Chapter 4 regulations.

The proposal was the subject of a hearing one week later on Jan. 9 and was approved unanimously by the board on Jan. 17. In accordance with the provisions of the Regulatory Review Act, the proposal then was forwarded to the attorney general for review. The attorney general’s office approved the proposal and forwarded it to the General Assembly and the Independent Regulatory Review Commission on May 2, 2008. This is the proposal being debated currently. A copy of the proposal is found in Appendix A of this paper.

Validation of local assessments

In order to continue using local assessments under the proposal, such assessments must be independently and objectively validated by a vendor selected by the school entity from a list of approved vendors published every five years by the secretary after obtaining the approval of the State Board of Education. In developing and selecting the list of approved vendors that may validate local assessments, the secretary would be required to employ a competitive request-for-qualifications process that includes consideration of: 1) organizational and staff experience in the validation of state and local assessments; 2) appropriate use of generally accepted psychometric statistical methods, practices and analysis; 3) references; and 4) cost. The secretary, with the concurrence of the State Board, could issue an additional request for qualifications prior to the end of the five-year period should the demand for validation services exceed the capacity of approved vendors.

School entities would be required to contract and pay the cost of validating each local assessment. Each local assessment would have to be validated by an approved vendor every five years. Except for the replacement of individual test items of comparable rigor, a new validation is required for any material changes to the assessment or revision of the assessed state academic standards.

Vendors would have to include the following criteria when determining whether the local assessment is comparable to the GCAs, as required:

- Assessments are internally consistent and reliable.
- Assessments adequately measure and are aligned with the academic content specified in the state academic standards assessed by the GCAs.
- Level of difficulty of assessment items is greater than or equal to those assessed on the GCAs.
- Proficiency-level cut scores are greater than or equal to that of the GCAs.
- Results of local assessments correlate positively and significantly with related national and state criterion-referenced assessments.
- Test administration, security and scoring regimes ensure that integrity and validity of the local assessment is maintained.
- Policy for annually updating assessment items ensures compliance with the previous criteria.

Supplemental Instruction

A student who does not score proficient or above on a PSSA administered in the 11th grade or GCA administered in any grade must be provided supplemental instructional support by the student's school entity. The supplemental instructional support must assist the student to attain proficiency in the state academic standards.

Issues with the GCA proposal

The debate over school assessments and their use has been ongoing in Pennsylvania since the PSSA test made its debut in 1991. Contention over the purpose of state tests, its administration, cost, uses and validity have all been voiced by education organizations, parents, students and other stakeholders within the public education community. Not surprisingly, the current proposal on Graduation Competency Assessments has drawn opposition not only from PSBA but also from organizations representing teachers, school district superintendents, school principals, parents, special education advocates and other stakeholders in the public education community. While the list of various issues that opponents of this proposal have is a long one, this paper will concentrate on four issues, the need for the proposal, the role of school entities in assessment and graduation, its likely effect on students and its cost.

Are Graduation Competency Assessments necessary?

In any debate over proposed legislation or regulation, the discussion surrounding the need for the changes that are called for is likely to be one that is fiercely argued on each side. Such is the case with the debate over this proposal.

Proponents for GCAs argue for the need for change with the following statements:

- In 2006, 57,000 students received a high school diploma in Pennsylvania without making a proficient score on the PSSA.⁶
- The existing system allows 501 school districts to have 501 different standards for graduation.⁷
- Students who graduate without scoring proficient on the PSSA are being cheated because they are given false belief that they are prepared when they are not.⁸
- Pennsylvania high school diplomas no longer have meaning to employers because of the many different standards for graduation employed by school districts.⁹
- Pennsylvania's community colleges and state universities spend almost \$28.7 million on classes to remediate college freshmen in reading, writing and mathematics.¹⁰

PSBA believes that the assertions made by proponents of the proposal are false. A failure to attain proficiency on the PSSA test does not guarantee that a student is not prepared for what follows high school, be it the workforce or higher education. The state's own PSSA validity study (HumRRO), which reviewed students at three Pennsylvania universities, shows that several thousand students in those universities who scored basic on the PSSAs in fact went on to college with no need for remedial classes. Among all three universities, 58.7% of students who scored basic or below on the PSSA tests took at least the standard level Math or English college

⁶ www.pde.state.pa.us, "Changing High School Graduation Requirements, New High School Requirements: Fact vs. Fiction"

⁷ IBID

⁸ IBID

⁹ IBID

¹⁰ Regulatory Analysis Form, State Board of Education proposed regulation of 22PA Code Chapter 4 – Academic Standards and Assessment (#006-312)

A total of 416 responses were given when entities were asked to describe the nature of local assessments used as graduation requirements. The majority, 230 responses, or 55.29%, indicated that such tests are developed by individual teachers or by departments or grade-level teams. A total of 66 respondents, or 16%, responded that they used tests available through publishers of textbooks used by the school entity or other instructional resources. Thirty respondents, or 7%, indicated that they used nationally available standardized achievement tests, and 74 school entities (18%) indicated that they used other types of assessments. In this "other" category, the most common types of assessments used were "4-Sight" and Study Island, although many different assessment types were listed by respondents.

School entities that responded that their local tests were developed by individual teachers or departmental or grade-level teams were asked to respond a follow-up question on the development of their tests. While the responses to this question varied, the common attributes in most of the items submitted mentioned the use of specific appropriate state standards, assessment anchors, the NAEP and PSSA questions to develop assessments that are reflective of the school's curriculum.

Entities responded that they ensured alignment with the state's academic standards and PSSA in a variety of ways. These include indexing questions on the local assessment to a state standard and/or anchor, alignment with state standards through a format developed during strategic planning, aligning assessments with course and curriculum mapping, item mapping, aligning local assessments with the PSSA based on the percentage of questions on the PSSA in each academic area, reviewing curriculum in each academic subject and through the work of employees receiving professional development in curriculum and assessment alignment.

Assessment strategies used as part of the local assessment system include locally developed tests (24%), course grades (20%), locally developed project or other performance assessments (19%) and student portfolios (14%). A discussion on the use of assessment strategies is included later in this paper.

On average, respondents reported a cost of \$154/student to develop, administer and score local assessments. Respondents indicated that on average, they spend \$53/student on costs related to the implementation of local assessments.

Respondents that said they use nationally available standardized tests indicated that they purchase tests from Success for All, Harcourt and CTB-McGraw-Hill most often. The most common tests fitting this description are 4-Sight and Terra Nova. A total of 81% of those using national tests indicated that the test developer ensured that the assessment purchased is aligned with Pennsylvania's academic standards. Others (10%) indicated that while there was no reference to the state's academic standards, the assessment was based on local curriculum, which is aligned to the state's standards. Respondents reported an average cost to purchase these tests of \$57/student, with an additional average cost of \$26/student to implement those assessments.

On the issue of remediation, 192 respondents (81%) indicated that they require remediation for students who score basic or below basic on the PSSA or local assessment. As indicated, remediation efforts include Study Island courses, tutoring, use of PLATO learning software, use of an individualized data-based grade-level learning plan system that includes remediation through other school programs, summer school, additional coursework and software programs, afterschool and Saturday sessions, remediation built into student schedules, math-plus-a-half/reading-plus-a-half programs, Web-based tutorial remedial-based programs and small group instruction. Respondents also indicated that study halls and other available time are used for remediation efforts.

standards on anchors. District has developed an individualized data-based grade-level learning plan system that includes remediation through other school programs, summer school, additional coursework and software programs.

Colonial SD – Consultants (psychometricians) provide guidance and support to teachers developing assessments. The district uses PSSA standards/assessments anchors as a guide and starting point. If necessary, the district adds “Power Standard” Essential Understanding to enhance test development. Benchmark assessments are built and reviewed, using pilot testing. Each local assessment question is aligned to both state standards and assessment anchors using PSSA/PDE tools.

Downingtown Area SD – Tests are developed through collaboration among course instructors. Item analysis is used to determine questions. The questions are aligned to the curriculum, which is aligned to PA Academic Standards. District used Webb’s Depth of Knowledge to write questions and align instruction.

Fort LeBoeuf SD – Teachers in each department collaborated to create a local assessment that reflected the PSSA anchors in mathematics, science, social studies and English. The local assessment was developed by auditing the curriculum and calibrating each of the eligible content within each anchor.

Hempfield Area SD – Local assessments are developed as each academic area undergoes an intensive curriculum review and revision. Developing district assessments around critical learning targets is a key part of the process. The curriculum review process is undertaken at the same time. The district has a very strong curriculum development process that includes district assessments of essential learning targets identified for students. It collects data on the performance of students on local tests and compare to PSSA results and uses data for ongoing curriculum revision and development of instructional strategies.

Marple Newtown SD – Grade-level or department-level teams work in cooperation with curriculum coordinators and building and district administrators to develop tests and ensure alignment with state standards. Each course is reviewed and curriculum aligned with state standards by teams or teachers and content specialists.

Mechanicsburg Area SD – Departments have identified the “know, understand and do” for each standard. This information is translated into essential questions for units. District uses collaboration between teachers to backwards map the question into course assessments.

Newport SD – Tests are developed by individual teachers in concert with departments using the assessment anchors, state standards and curriculum. District has a Project 720 high school. Because assessment anchors, state standards and PSSA materials are used in developing tests, the district believes local tests are properly aligned.

North Allegheny SD – As departments undergo curriculum updating, a test bank of standards-based assessment items is developed. These items assess mastery of the PA standards aligned to each course on a quarterly basis. As a first step, all curricular departments complete a K-12 alignment form of the PA standards. As a result, each grade level and course is assigned to the

discounted by proponents of the GCA proposal as being ineffective or less rigorous than state assessments.

The undeniable facts are that districts use a variety of tests and means of aligning those tests with state academic standards. PSBA does not assert that the survey results prove that all school districts are following the current high school graduation regulations, but we believe it demonstrates that there are many school districts where the local assessment is developed and aligned as required under the current regulations.

Graduation, curriculum and local control

Setting graduation requirements and curriculum historically has been the province of local school districts. The Public School Code, in sections 1611 and 1613, asserts that school districts have the authority to confer degrees and certificates to students who complete mandatory courses of study. The very same Chapter 4 that is being proposed for amendment affirms local control over design and planning of curriculum. Portions of Section 4.4. (General policies) of Chapter 4 read as follows:

(a) **It is the policy of the board that the local curriculum be designed by school entities to achieve the academic standards** under §4.12 (relating to academic standards) and additional academic standards designated in strategic plans under §4.13 (relating to strategic plans).

(b) **It is the policy of the board that local school entities have the greatest possible flexibility in curriculum planning** consistent with providing quality education and in compliance with the School Code, including requirements for courses to be taught (24 P.S. §§15-1501 and 16-1605); subjects to be taught in the English language (24 P.S. §15-1511); **courses adapted to the age, development and needs of the pupils** (24 P.S. §15-1512); minimum school year of 180 days and minimum of 900 hours of instruction at the elementary level and 990 hours of instruction at the secondary level (24 P.S. §§15-1501 and 15-1504); employment of sufficient numbers of qualified professional employees (24 P.S. §11-1106) and superintendents to enforce the curriculum requirements of state law (24 P.S. §10-1005); and this part. (*Emphasis added*)

PSBA also believes that the GCA proposal would severely limit the number of methods by which students could demonstrate proficiency for graduation. While the proposal purports to continue to allow a local assessment as a permissible demonstration of proficiency, such assessments would have to be validated using the criteria contained in the proposal. These include the criterion mentioned previously on page 7. A spokesperson for CTB/McGraw Hill, a leading testing company had the following to say regarding the validation requirements contained in the proposal:

“To do the [validation] study correctly for 10 GCAs with a small sample size and to conduct on-site training for content validity and alignment for 10 tests would probably be cost prohibitive for any one regular-sized school district.”¹²

It is clear in the proposal that school districts have to develop multiple local assessments to use as graduation requirements. The proposal in §4.24(b)(iv)(C), the language that describes the graduation requirements beginning in 2013-14, mentions “locally administered, validated criterion-referenced **assessments** comparable to the GCAs.” (*Emphasis added*)

¹² E-mail message from Dan Sidelnick, CTB/McGraw-Hill, to Dr. Mary Ravita, South Fayette SD, March 11, 2008.

On the other hand, the proposal requires local assessments to be “validated criterion-referenced assessments comparable to the GCAs.”¹⁵ There are no changes to §4.51 (State assessment system) that would allow for the use of different assessment strategies. Consequently, students that are not good test takers will have more difficulty in demonstrating proficiency in order to graduate.

Proponents of the proposal argue, however, that because students can continue to take the GCAs until they pass them, the pressure will be removed from students who do not do well on standardized tests. PSBA counters that the pressure on students will not be removed but will increase. In addition to facing the prospect of not being able to graduate, students will face the prospect of staying in remediation classes, perhaps missing or being unable to schedule desired or required classes while remediation takes place.

Some researchers even question the validity of remediation efforts at the high school level.

A final problem is that providing remedial help in grades 10, 11 and 12 is surely the proverbial “too little, too late.” A student’s performance in one grade powerfully influences performance in subsequent years, so it takes several years of *sustained* efforts to move a student’s performance from a low level to one sufficient to pass an exit exam. This means that efforts to improve exam performance should start at least in middle school, and perhaps even in elementary school, to ensure that all students acquire basic skills in literacy and numeracy. Overall, states are caught in an inescapable dilemma. If they set exit exam standards high, incorporating 11th- and 12th-grade material, then pass rates will be low and states will have to confront the expensive and difficult challenge of helping all students meet high standards, throughout the middle and even elementary school years. If they set standards low, then most students will pass, and states can hope that short remedial programs at the last minute will pull most of the remaining students through. But this tactic defeats the purpose of exit exams, since it neither maintains high standards nor provides low-performing students with powerful education experiences. Under these conditions, exit exams become symbolic rather than strategic.¹⁶

Proposal costs

Almost as critical as the question “Is this proposal necessary?” is the question “How much will it cost?” As with the first question, there typically are sharp differences between proponents and opponents of proposals on the second question as well. The Regulatory Analysis Form accompanying the proposal declares that “districts will incur savings of approximately \$8 million annually resulting from the adoption and use of the voluntary model state curriculum.” These savings result from “reduced staff time, consultant fees, materials, research and development costs, etc.” In addition, the board estimates that districts will save in excess of \$220,000 annually in staff time, copy costs for the development and administration of individual teacher, school or district-wide final course exams.”¹⁷

Of course, in order to make these statements regarding potential savings, an assumption has to be made that a certain number of districts will have to use the voluntary model curriculum and the GCAs to replace current examinations. The board estimates that 250 school districts initially will use the model state curriculum. No estimate is given on how many districts would replace

¹⁵ Proposed §4.24(b)(iv)(C)

¹⁶ “‘Restoring Value’ to the High School Diploma: The Rhetoric and Practice of Higher Standards”; W. Norton Grubb Ph.D., University of California, Berkeley; Jeannie Oakes Ph.D., University of California, Los Angeles, October 2007, Education and the Public Interest Center

¹⁷ IBID, Regulatory Analysis Form

Conclusion

Both the proponents and opponents of the current GCA proposal are united in their desire for a system that ensures that students graduate from high school proficient in Pennsylvania's academic standards. Proponents believe that the only way to ensure this is through state tests – either the PSSA or the GCAs. Opponents, including PSBA, believe that a system that allows local tests aligned to the state academic standards and the PSSA can meet this requirement. PSBA is not convinced that the discrepancies shown by the proponents that more students are graduating without scoring proficient on the PSSA point to a deficiency in local assessments.

The association believes that the data from its survey of school entity assessment practices shows that districts expend considerable time, effort and resources, both personnel and financial, in developing local graduation assessments. Even within the limited information that could be shared through the survey, it appears to us that school entities are making a sincere effort to develop and align test to the best of their ability.

The conferring of high school diplomas and development of curriculum are issues that have a long history of local control, as stated in the current School Code and State Board regulations. Simply wiping away such local control in favor of statewide testing and curriculum development could have lasting effects on Pennsylvania's high school students. Time and again, it has been shown that a "one-size-fits-all" approach does not work in education.

The proposal also will be harmful to students, especially those who do not fare well on standardized tests and on those who attend school entities that do not have the capacity to provide the quality of instruction available in the state's wealthiest school districts.

Rather than spend the estimated \$160 million over five years to implement the GCA proposal, PSBA believes those dollars would be better spent on efforts that capture the best practices in local assessment and sharing and implementing them in all districts statewide. The final result would be graduation requirements that are based on a mixture of state and local assessments that accurately measure a student's proficiency in the commonwealth's academic standards. Additionally, such a system would allow the continued use of various assessment strategies through the local assessment, ensuring that all students would have a variety of alternative methods in which they could demonstrate proficiency.

Finally, some of the funds earmarked for the implementation of this proposal could go to school districts that cannot provide adequate assessments because of lack of financial resources. Funds could be used to help districts hire necessary staff or contract with test providers or intermediate units, as some already do, to help create and implement rigorous local assessments and to provide districts with technical assistance.

