STATE BOARD OF EDUCATION HIGH SCHOOL REFORM CENTRAL SUSQUEHANNA I.U. 16

LEWISBURG FRIDAY, FEBRUARY 27, 2009 10:00 A.M.

| | NAME | ORGANIZATION/ADDRESS |
|--------------|----------------------------|---|
| 10:00 | KATE LUMAY MIKE CROSSEY | ORGANIZATION/ADDRESS CENTRAL PA WLB PSEA - VICE PRESIDENT |
| 10:10 | JONATHAN CLEAVER | BERWICK SCHOOL DISTRICT - HS PRINCIPAL |
| 10:20 | ROBERT CORMANY | PA ASSOC. OF PUPIL SERVICES ADMIN. |
| 10:30 | MARK DI ROCCO | LEWISBURG SCHOOL DIST SUPERINTENDENT |
| 10:40 | HARRY MATHIAS | CENTRAL COLUMBIA SD - SUPERINTENDENT |
| 10:50 | CYNTHIA O'HORA | INDIVIDUAL |
| 11:00 | RICHARD MEXTORF | LOYALSOCK TWP SD |
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Statement of

Kate Lomax

Youth Coordinator

Central Pennsylvania Workforce Development Corporation - CPWDC (Central Pennsylvania Workforce Investment Board)

On

PUBLIC HEARING ON HIGH SCHOOL REFORM

Before the:

State Board of Education

February 27, 2009

Introduction

Good morning. I want to thank you for the opportunity to provide this testimony. My name is Kate Lomax and I am the Youth Coordinator for the Central Pennsylvania Workforce Development Corporation -- the CPWDC, which is the nonprofit corporate entity of the Central Pennsylvania Workforce Investment Board. This workforce board serves a nine-county region that includes Centre, Clinton, Columbia, Lycoming, Mifflin, Montour, Northumberland, Snyder and Union counties. Our mission is to be the leading vehicle for regional unification, coordination, integration and alignment of workforce activities, resources and initiatives to support economic sustainability, improve education systems and develop and retain a quality labor force in Central Pennsylvania.

For the past five years, CPWDC has been focused on collaborating with the region's 31 school districts to improve and enhance connections between business and education.

CPWDC views the Pennsylvania Academic Standards for Career Education and Work as a significant mechanism for ensuring that all students leave high school with an understanding of who they are as it relates to careers, how to get a job, how to keep a job and how to create a job opportunity through entrepreneurship.

While the urgency of workforces shortages may have been temporarily curtailed due to the current economic situation, it is still critically important that every individual living in our region have the tools to develop skills aligned to the region's key industries. In order to compete in a 21st century global economy, Pennsylvania needs a highly-educated and proficient workforce. By the year 2010, the U.S. will face a shortage of 12 million qualified workers for the fastest-growing job sectors including health care and computer technology. In

Central Pennsylvania, there is increasing concern that over the next decade the region could experience a shortage in a skilled workforce. Research suggests that the demographic reality in most if not all counties is that we will have more individuals retiring and leaving the workforce than we will have young adults entering the workforce.

CPWDC, in interactions with over 1,500 employers who participate in seven industry partnerships, serve as private sector Workforce Investment Board members and hire workers through the Pennsylvania CareerLink facilities, understands employers' concerns about finding a workforce that possesses the right skills to ensure the business' ongoing profitability. This has been an increasingly difficult task, partially because there is no defined standard for skill proficiency. The skills obtained by 12th grade are the foundation, but no longer enough given the fact that over 60% of all new jobs being created require at least some postsecondary education.

In May 2008, the Central Pennsylvania Workforce Investment Board and the Local Elected Officials Board (composed of one County Commissioner from each of the Central Region's nine counties) passed a resolution to support high school reform through some uniform process to measure core competencies of high school graduates. The support is based on four key facts. First, the continued growth of Pennsylvania's economy, and in turn Central Pennsylvania's economy, is dependent on a well-educated workforce that can respond to the current and future demands of our key industries. Second, the well-paying, high-skill jobs of the global economy demand employees who can demonstrate strong literacy, math and problem solving skills. Third, graduation competencies should be consistent regardless of the students' aspirations after high school. Gainful employment in today's workforce demands

that students master the same essential foundation skills regardless of whether they plan to enroll in postsecondary education or immediately seek employment. As reported by Pennsylvania Partnerships for Children, in 2007, 44% of Pennsylvania's high school graduates did not score proficient on the 11th grade reading and math PSSAs, the 12th grade retake or did not take the PSSAs but graduated based on local assessments. Far too many students need remedial education when they enroll in postsecondary education and continuously we hear from employers their frustration with a lack of basic skills of new hires.

The WIB and LEO Board's endorsement of the graduation competencies is not so much confirmation of the assessment content as it is support of the model to return relevance to the high school diploma. The WIB acknowledges that some employers find little value in using the high school diploma as part of the hiring process. Employers are seeking some way to document that students leave high school with the skills to meet college and workplace expectations.

These resolutions were not passed to criticize school districts, our youth or our communities.

The private sector led Workforce Investment Board passed this resolution because of the concept and what they hoped it would create — assurance that our future workforce possesses the foundational skills necessary to participate in the economy and help the U.S. (and specifically the Central Region) remain competitive. For the Workforce Investment Board, the debate around graduation competencies is more of a discussion concerning economic development and workforce readiness rather than a discussion concerning the education system.

In addition, employers are unsure of what each school district's diploma says about the skills of an applicant and have asked for consistency. The Commonwealth's 501 school districts currently have no uniform standards for deciding when to award a high school diploma. Instead, each district is

allowed to set its own diploma requirements, resulting in a system of vastly different graduation standards across the state. This has allowed students to obtain a diploma even though they may not have the skills to succeed in the world of work or postsecondary education. This not only creates a disservice to those students earning diplomas despite gaps in academic proficiency, but for all of us - taxpayers, parents, employers and workers. Many of our high school graduates are entering the workforce or higher education inadequately prepared for the challenges they will face. The result is often poor performance, an inability to compete, high employee turnover and lost productivity, profits and wages. We can no longer afford the costs of students being unsuccessful in the world of work or in the world of education.

As companies look to locate, expand or sustain operations in Central Pennsylvania, they are increasingly asking questions about the educational level and proficiency of our current and future workforce. Land, tax abatement and infrastructure all remain important in the economic development game. However, the questions are increasingly directed towards the ability of a region and the state to demonstrate the skills of their workforce, the system in place to develop these skills and the local, regional and statewide commitment to education at all levels.

The CPWDC hopes that the Department of Education and the State Board of Education will work with employers and postsecondary institutions throughout the implementation of the graduation standards. In order to be effective, employers and educators must validate that the proposed assessments truly measure the skills they are seeking. Another series of tests that is not closely aligned with the expectations for college and work will not benefit anyone; however, if the graduation standards are aligned, all parties – students, employers and educational institutions – win.

Clearly the CPWDC understands the controversy behind creating yet another standard for students and schools; however, the support for the graduation standards is based on creating consistent and documented foundational skills. The CPWDC believes that however it is accomplished, the

competency levels of our graduates must be demonstrated because skills matter – to employers as a vital input to our long-term economic well being and, most importantly, to our students and our children as a vital step toward their ability to compete and prosper.

In conclusion, the endorsement resolved by the Central Pennsylvania Workforce Investment Board is based on the belief that graduation standards offer us a pathway to achieve this goal. Therefore, the Central PA WIB strongly endorses giving the high school diploma meaning by requiring all students to show that they are career- and college-ready in English, math, science and social studies before they graduate. The Central PA WIB encourages the State Board of Education to adopt a requirement that students demonstrate proficiency in these core subjects in order to earn a high school diploma. However, the Commonwealth must provide the necessary tools and resources to support students and schools in meeting these real-world expectations for college- and career-readiness, before making any tests mandatory for graduation.

The GCAs offer us a pathway to achieve our regional, state and national goals for economic and workforce development and for these reasons the CPWDC supports the State Board of Education effort to implement a process that has meaning to employers and to educators. Again, on behalf of the Central Pennsylvania Workforce Development Corporation, thank you for the opportunity to present this testimony today.



Central Pennsylvania Workforce Development Corporation

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Testimony of the Pennsylvania State Education Association Regarding Proposed Graduation Competency Assessments (GCAs)

Presented to the Pennsylvania State Board of Education Friday, February 25, 2009

By: Michael J. Crossey Vice-President, Pennsylvania State Education Association

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Good morning. I am Mike Crossey, a Special Education teacher with 34 years of teaching experience in Allegheny Intermediate Unit 3 and the Keystone Oaks School District. I am currently on leave from my teaching position and serving as the Vice-President of the Pennsylvania State Education Association. I am here today to speak on behalf of PSEA's 187,000 school employees and voice our concerns regarding the proposal to establish high stakes exit exams known as Graduation Competency Assessments or "GCAs".

PSEA stands in opposition to this proposal or any other that seeks to implement yet another high stakes test for our students. From a practical standpoint, there are too many unanswered questions for the Commonwealth to move forward and implement a policy that will have wide ranging social, economic and educational impacts. Fundamentally, the imposition of GCAs and high stakes testing is not sound educational policy.

PSEA is not alone. Twenty-four organizations formally oppose GCAs. Their Joint Statement in Opposition to GCAs is attached. The signatories represent parents, students, civil rights advocates, advocates for children with disabilities, advocates for gifted students, principals, superintendents, school board members, pupil services administrators, teachers and others. This consensus from such a broad cross-section of organizations, representing hundreds of thousands of Pennsylvanians, indicates that there are serious problems with this proposal. The proponents of GCAs contend that these tests are necessary if we are to increase student achievement. PSEA agrees with the goal of increasing student achievement, but high stakes testing is not the way to accomplish this goal. In fact, there are numerous other options that would directly benefit student achievement. PSEA believes the state would be better served focusing on either implementing or broadening those proven options within the K-12 public education system.

There is extensive research that demonstrates significant unintended consequences of high stakes testing that we will assuredly encounter if the GCA proposal is adopted as proposed. For your convenience, PSEA has compiled a sampling of this research and provided it along with this testimony for your review. In sum, the research has found that the negative consequences of high stakes testing include increased dropout rates, harmfully narrowed curriculum, diversion of resources away from education of students and toward more standardized testing of students, and disproportionate harm to some of our most vulnerable students -- students living in poverty, minority students, English language learners, and special needs students.

For the sake of discourse, I ask that you set aside PSEA's strong opposition and take a full spectrum overview of this proposal. In doing so, it is easy to see that this debate must be broadened to increase the likelihood of obtaining the best possible outcomes for our students. The State Board and policymakers should look to addressing the following policy concerns.

Funding

In late 2007, the State Board of Education released the much anticipated Costing-Out study, which confirmed what those of us in the education community already knew: public education is currently underfunded by more than \$4 billion. Compounding this funding shortfall is the fact that Pennsylvania went for many years without a formula to distribute these dollars equitably to insure that students have an equal opportunity to meet the state standards regardless of the community in which they live. The GCA proposal would allocate millions of dollars annually toward developing and administering the GCAs; PSEA believes that prior to the expenditure of funds on high stakes testing, the state must first meet its commitment of adequately and equitably appropriating the resources needed to guarantee student success. Progress is being made on the funding front. Act 61 of 2008 provides for a six-year state funding

commitment. This funding formula is geared toward closing the "adequacy gap" between current funding levels and those set forth in the Costing Out study. However, due to the current economic conditions, full funding for the second and subsequent years of the formula is not guaranteed. Even if the formula is fully funded within six years, it would be years before students come through the system at full adequacy funding.

State-Developed Model Curricula and Assessments

State developed model curricula, along with the materials and the professional development to properly implement them, could be useful. Many school districts have worked hard to align curricula with state standards. Others have struggled to prioritize curricular alignment on a list of many competing challenges. Although no district intentionally denies students an appropriate curriculum, there are some that may lack the capacity to build and deliver a standards-based curriculum that is challenging as well as seamless from one grade to the next.

Denying a diploma to the students in these districts will not change these problems; specific technical assistance from the Department of Education can. For these districts and others, a model curriculum could have many benefits, such as:

- Providing districts with clear, specific guidance concerning appropriate curricular content and level of instruction;
- An easy-to-use tool for districts lacking the capacity to develop such a curriculum on their own;
- Underscoring the intent of state standards and assessments and discouraging rote learning, test drilling, or narrow, depleted curricula; and
- Providing PDE with a useful tool to help build instructional capacity within schools and districts while expanding students' exposure to standards-aligned curricula.

A statewide model assessment system would provide a standard of comparison for those that have model curricula and a benchmark of progress for those that have not. Yet, even in a system that includes model end-of-course assessments, standards of practice in the field of student assessment insist that these tests be used as only one of many sources of evidence to make graduation and promotion decisions. A statewide model assessment system could reflect high standards of professional practice by including several different types of formative and summative, group and individual, assessment strategies.

Evaluation systems that include multiple sources of evidence are more appropriate than high stakes testing for several reasons:

- Multiple sources of evidence are more valid and reliable than one-size-fits-all systems
 because they give students more and different opportunities to demonstrate
 proficiency over time. In general, systems with multiple sources of evidence can be
 designed to more closely reflect how and what students should learn.
- Systems with multiple sources of evidence can be designed to measure a wide range
 of standards-based educational performances, and thus do not generally narrow the
 curriculum to drill and test preparation.
- Multiple sources of evidence can suggest more specifically the areas in which individual students require extra support.

Targeted Auditing and Intervention with Local Assessment Systems

Proponents of the GCAs cite the large number of school districts where the difference between the percent graduating and the percent scoring proficient or better on the PSSA is 20% or more. They cite this number to support severely altering local control over graduation. Yet, the PSSA has never been validated to be used as an exit exam and was never designed as such.

Furthermore, the PSSA was not designed as a tool to validate local decisions as to which students should graduate. The State Board of Education specifically directed HumRRO not to look into the question of whether "the PSSA produce[s] results that support decisions required by Chapter 4 regulations.... Includ[ing] a determination of whether a student has demonstrated proficiency in meeting State academic standards in reading, writing, and mathematics; the award of the State certificate of proficiency or distinction; etc." (This language is a direct quotation from the HumRRO report, "PSSA Issues and Recommendations", May 2004, Arthur A.

Thacker.) Comparing the number of students who graduate based on local assessments to the number of students who achieve proficiency on the PSSAs tells us nothing.

The State Board of Education does have data that demonstrates it is false to claim that local graduation assessments must be inadequate when they show more students to be proficient than those who scored proficient on the standardized paper-and-pencil PSSAs. This data too is found in the HumRRO report, which studied students who enrolled in three Pennsylvania universities and shows that 58.7% of students it tracked who scored basic or below on the PSSA tests took at least the standard level mathematics or English college course. Meaning, most students who supposedly "failed" the PSSA enrolled in non-remedial college courses in the same subject area. There were thousands of students in these three universities who would not have been able to go on to college if we were to believe that a proficient score on the standardized PSSA test is the correct standard for determining who should graduate. Clearly, these higher education institutions were looking at multiple indicators of performance, as they should.

PSEA believes a more prudent approach, educationally and economically, would be to identify and target districts in need. There are some school districts that do not have the capacity to develop adequate, aligned assessment systems. However, these districts need to be identified

through sound statistical analysis and auditing and assisted with interventions to develop that capacity. Prior to any intervention, we believe that both state and local systems would benefit from adjusting the PSSA percentages to account for percent of IEP students and English Language Learners not scoring proficient or advanced. This process could begin by auditing school districts where the discrepancy between percent proficient of graduation and percent 11th/12th grade PSSA proficient, after adjustment for these students, is significant.

No one argues that both groups of students present serious challenges to school districts. In 2006-07, these two groups were among the lowest in scoring proficient or advanced of all the disaggregated groups of students. Obviously, they are groups upon which we need to focus more resources and energy; and yet, implementing the GCA proposal will do nothing but drain the entire system of both.

Again, as proponents of GCAs continue to push back with the allegation that there is overwhelming evidence of need for these tests due to the significant difference between students not scoring proficient yet graduating from high school, it is imperative that you remember it truly does not matter whether the difference is 5% or 95%. Until the PSSA is validated for use as an exit exam, it is premature to use this as the basis for such a fundamental policy change.

GCA Implementation Costs

PSEA estimates that the cost of developing and implementing the GCAs has the potential to require hundreds of millions of dollars in new expenditures at the state and local level.

Further, we believe that the Regulatory Analysis Form forwarded along with the Board's original proposed regulations is flawed and missing pertinent data. The form includes dollar amounts in various savings and costs categories, but no explanation of the basis for those estimates. The \$5 million per GCA for test development (\$50 million total for 10 GCAs) is

possible, although it appears to represent a low-end estimate in light of the fact that the proposed regulations would require each GCA to be administered three times per year, meaning that three distinct versions of each GCA would need to be developed.

Other cost estimates in the Regulatory Analysis Form are not possibly accurate, however.

Costs to the Regulated Community, which includes school districts, are estimated at "zero".

First, I refer you to the attached analysis by the Center for Education Policy, "High School Exit Exams: Costs to Consider", which states:

"While state policymakers may view exit exams as a low-cost way to raise student achievement, the exam costs --both apparent and hidden --are considerable. The true costs of an exit exam policy often are invisible to state policymakers because the majority of expenses are absorbed by the local school district --an estimated 96% according to CEP research."

One example of a cost that school districts would have to bear under this proposal is test administration. Already, school professional staff divert many hours to protecting security on the PSSAs and proctoring those exams. School guidance counselors commonly lose days every year to counting out tests, checking test numbers, collecting tests, proctoring exams, etc. The PSSA is administered just once a year, in stark contrast to the GCAs, which would be administered multiple times each year. Further, participants who spoke at the State Board roundtables questioned the feasibility of maintaining security on these tests. This equates to more than a fiscal impact; a guidance counselor dedicating days to protecting security on shrink-wrapped standardized exams is losing days of working with and counseling students. Students can ill afford additional loss of counseling services sacrificed on the altar of more standardized testing.

Another item that appears to have been ignored wholesale during this policy debate is the cost of remediation. PSEA's Research Division prepared a minimum cost estimate for remediation in just two of the 10 GCAs: the result was \$115 million per year if the remediation is provided in class sizes of 25, and \$187 million per year if provided in class sizes of 15. A spreadsheet that shows how those estimates were calculated is attached. Carrying these estimates out to all 10 GCAs, the minimum cost estimates for remediation are \$575 million to \$945 million per year.

Moreover, our researchers indicate that this is a likely low end figure due to the specific requirements for highly individualized remediation for students, based on the components of the GCAs on which they do or do not achieve "proficiency". How these costs will be covered cannot be left to chance, yet there has been no serious discussion of this aspect of the proposal.

Ultimately, the costs of this remediation model are most likely substantial, which raises a question as to how the costs to school districts could be estimated at a \$0 figure.

Post-Secondary Remediation Rates

No one questions PDE's good intentions in their efforts to improve the preparedness of Pennsylvania's high school graduates. Neither should anyone question that the members of PSEA take very seriously their central role in that effort as well. As such, we consider it our duty to point out some of the critical issues the Department has so far failed to address.

Recently, PDE distributed a spreadsheet and a press release that tallied the costs of remedial course work for Pennsylvania high school graduates enrolled in state-owned universities and community colleges. While these documents provide some worthwhile data, they raise more questions than they answer, and in no case do they serve as a rational basis for adopting the GCAs.

First let me begin by reviewing some of the key inadequacies of the spreadsheet and press release:

- The PDE spreadsheet combines the costs of remediation by both state-owned universities and community colleges. This is inappropriate and can be misleading since, by definition, the mission of Pennsylvania community colleges requires them to practice open admissions. Community colleges provide the crucial second chance to thousands of students who have graduated high school or received GEDs, but who for a wide array of reasons did not perform at a college preparatory level and were not ready to take that step. We find it incongruous that the Department would imply that community colleges are not designed to perform a remedial function.
- PDE also did not break out the number of community college students enrolled in remedial courses who were special education students in high school and had the services and benefits of an IEP during their high school years. We know that community colleges provide valuable opportunities for special education students allowing them to pursue higher education. It would be a sad mistake to discourage the aspirations of these students, and we applaud the efforts of community colleges to meet their unique needs. At the same time, it cannot be correct to use the needs of these students for remedial classes in some areas as a way to undermine confidence in the public schools that provided them with their elementary and secondary educational opportunities.
- The Department's press release claims that this "research presented to the State Board of Education examined enrollment trends at the state's community colleges and state-owned universities", yet only one year of data is contained in the spreadsheet. One

- year does not constitute a trend. It is simply not valid to prognosticate based on the limited data presented.
- between when students took their original courses in high school, or even if they took those courses, and when they needed to take the remedial courses at these postsecondary institutions. Students who interrupted their studies, including many who did not take them seriously until they spent some time in the labor force, may quite predictably have found themselves needing remedial work when they returned to school. We simply cannot tell from the data presented. The information also does not distinguish the proportions of students needing remedial work in math or reading and writing.
- Perhaps the most egregious shortcoming of the PDE data is that it does not indicate how those students needing remedial work performed on their 11th grade PSSA Mathematics and Reading tests. Why didn't PDE check to see how these students who needed remedial classes did on the PSSAs? In the press release, PDE reported that last year 32.9% of the students in its data set required remediation in first year college math or English. What is not illustrated is that two years earlier, when one would assume most of this cohort took the 11th grade PSSA tests, 48% scored below proficient statewide in Math, while 34.9% scored below proficient in Reading. This indicates clearly that the state need not invest in another set of tests if the primary purpose of these tests is to identify students in need of remedial work.

Ultimately, PDE's release provides little "research" and even less analysis. This effort certainly does not qualify as a "study".

The unfortunate fact is that we know very little about the cost, scope, and nature of remedial education as currently undertaken across Pennsylvania. This body of information is essential if we are to engage in rational policymaking. Spending precious resources to develop yet more tests, pressing ahead with the development of GCAs before such a study is conducted makes little sense to our organization. Such a study must consider all of the questions and issues I've briefly outlined.

Let me raise one final question on this issue, starting with a quote from the PDE press release that states: "...the remediation data is further proof of the need to implement statewide graduation requirements to ensure all graduates have the academic skills needed to compete at the college level."

Often commentators and policymakers use the concepts of college readiness and work force readiness as if they were interchangeable. The research base supporting the claim that these two very different outcomes require the same types of academic preparation is very thin and unconvincing. It is true that the highest-paying, most secure careers are available to the college-educated. However, there are and will continue to be millions of jobs in the service and manufacturing sectors that are available to our students who are simply not ready for, not interested in, or not capable of meeting the demands of a traditional four year college.

While PSEA believes firmly in the inherent value of education as well as its central role in maintaining a healthy and informed public, we understand that students have widely varying levels of talent and motivation in doing academic work. We believe that high school diplomas represent an important and valuable credential in and of themselves. They indicate that the holders have met certain academic standards and have shown the discipline to complete high school. While it is our sacred trust to help each individual student fulfill his or her full potential

and help them realize their dreams, we do not believe it makes sense to deny those with lesser academic ability the chance to earn an important credential and recognition for their efforts. We are proud Pennsylvania has one of the highest graduation rates in the country, and we will do all we can to maintain and improve on that record, but we see no need for the GCAs to help bring that about.

So the question becomes how can we improve Pennsylvania student achievement?

With a high price tag attached to this GCA proposal, and a vast array of evidence indicating an abundance of negative consequences, PSEA urges the State Board and the General Assembly to consider further investment in proven, research-based strategies that we know will improve student achievement. A few of these initiatives include:

- Parental involvement programs. Any teacher can tell you from personal experience what the researchers have documented repeatedly: children do better in school when their parents are actively involved in their education. Although many parents understand the importance of being active participants in their child's education making sure their children do their homework, communicating with school personnel, and volunteering in their children's classrooms -others, particularly those who themselves grew up in homes where education was not valued or who may be facing difficult personal or economic situations, need help and encouragement to become effectively involved.
- Transition programs. There are two transition points in a student's education at which the student is particularly vulnerable: the move from elementary school to middle school, and again from middle school to high school. Students who have trouble making these transitions often disengage from school, finding themselves on a short

path to academic failure. There are programs to help students make these transitions.

They are effective not only at lowering dropout rates and improving academic achievement; they can have collateral positive effects such as reducing drug abuse, teenage pregnancy, and dropping out of school.

- Smaller class sizes in the early grades. The evidence is clear: children in smaller
 classes in grades kindergarten through four perform better academically. This occurs
 not only in those early years, but they will do better academically throughout their
 educational careers.
- Early childhood education. Talk to the kindergarten and first grade teachers in your school districts. They will tell you about the vast disparity in the readiness of the students who come to their schools. Some children arrive in kindergarten knowing their alphabet and numbers, even reading. Other children arrive in the same kindergarten classes unable to even name the colors red, blue and brown; they have not even begun to learn their alphabet and numbers. When children start school so far behind their peers, they are at a serious academic disadvantage that is exceedingly difficult to overcome. Indeed, many never catch up. Compounding this situation is the fact that many of those children are coping with other serious problems affecting them and their families -unemployment, poverty, inadequate health care, and homelessness.

Most importantly, the state could fund school districts at the adequacy targets indicated in the recent costing-out study. This would enable administrators and educators to implement these and other initiatives that are proven to help improve student achievement. All of these steps can help to further elevate Pennsylvania's status among the states as a leader in educational opportunity and will help close the achievement gaps that are present in too many of our schools.

PSEA is and has been committed to supporting these efforts. Together, we can find ways to support our children, helping them to achieve without adding to the ever-growing testing culture permeating our schools and without unfairly jeopardizing their futures through unwarranted denial of high school diplomas.

Thank you for conducting this hearing today and providing PSEA the opportunity to testify before you.

Berwick Area School District Berwick, PA 18603

Submitted by Wayne Brookhart, (Superintendent); Holly Morrison, (Director of Curriculum); Jonathan Cleaver, (High School Principal)

Statement form:

Good Morning and thank you for the opportunity to speak on this very important topic of High School Reform. My name is Jonathan Cleaver, High School Principal from Berwick Area School District.

On behalf of the Berwick Area School District Secondary Administration we have had numerous discussions regarding this important proposal. The position that we have taken on Graduation Competency Assessments is that the assessments would be a positive development in the Commonwealth if implemented in place of the current PSSA's and aligned to the proposed state curriculum. In addition our feeling is that the state should bear all costs of the development and administration of the GCA's. We believe that all professional development costs and any additional supports and their costs should be assumed at the state level.

We feel that these GCA's should take the place of our local final exams and should be administered at the conclusion of each course thereby increasing classroom instructional time by decreasing the time needed to administer the PSSA assessments in the spring. The proposed GCA's are a natural extension of a curriculum that is already in place in every high school in PA as opposed to the current PSSA, which through its content and placement has been an obstruction to the educational process.

High schools have traditionally featured a content specific structure, which is conducive to success in the workplace and in post-secondary educational institutions. Student achievement levels measured by the PSSA fall short of being a true measure of the success of a high school. The proposed Graduation Competency Assessments would measure those skills currently assessed by the PSSA and would also measure the content knowledge of the student. The GCA's would clearly provide a more valid instrument for assessing the success of a student and building at the high school level than the current Accountability System in place in the Commonwealth.

The Berwick Area School District will meet the challenge of any accountability measure which is put in place by the state. We do feel, however, that the current PSSA is not an appropriate measure at the high school level and that content specific assessments are consistent with the mission of true high performing high schools.

We appreciate the difficult task you have assumed and the political nature of this debate. Obviously, the best interests of the students should drive this debate and your decision. We feel the GCA's are a positive development for Pennsylvania and the best way to meet the needs of our students.

Again, I appreciate the opportunity to speak on this topic.

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Jonathan Cleaver

Principal

Berwick Area High School

Pennsylvania Association of Pupil Services Administrators Testimony re High School Reform and the Proposed Graduation Competency Assessments

February 27, 2009

TO:

Members of the State Board of Education

FROM:

Dr. Robert B. Cormany, Executive Director

RE:

Comments Concerning High School Reform and in Particular the

Proposed Graduation Competency Testing for Students in Pennsylvania

Thank you for the opportunity to present testimony concerning this critical issue. While the purpose of this hearing is to examine high school reform, I will focus my comments upon the proposal for the creation of Graduation Competency Assessment instruments, which has raised numerous concerns among those of us in the field of pupil services. I have polled our membership to identify the pressing questions they feel should be addressed related to this topic. Let us consider the following questions:

1. Why do we need yet another test?

Already far too much time is taken away from instruction by standardized testing. Dr. Robert Slavin, an expert in educational psychology from Johns Hopkins University, has estimated that in the average classroom only 60% of time is available for instruction. The rest devoured by everything from standardized testing to public address announcements to assemblies. This means that students now have the equivalent of 107 days of instruction out of the 180 days they spend in school. At the same time, they are expected to learn not only more, but more rigorous material. Standardized test publishers sell more than 200,000,000 tests annually to public school districts. This amounts to approximately four tests per child. Since the 11th grade PSSA is already in place, the question remains unanswered "Why another test?" It has been stated previously that the cutoff scores for the new test would be aligned with those for the PSSA. If that is the case, then it is even harder to justify the need for an additional measure.

2. How should test results be used?

The idea of using a standardized measure as a "bright line criteria" for graduation is rejected by every reputable expert in the field. If you have been told otherwise, you have been misinformed. Dr. James Popham, probably the most respected figure in

measurement and a faculty member emeritus at UCLA, has warned that, while group standardized tests can be quite useful as measures of group performance, they have little use as measures of individual performance. This is the reason why special education placement decisions require one-on-one testing rather than mass testing; and even then considers the test results one factor among many. Variation for the individual is too great to apply cutoff scores. This flaw is reduced by using the test results as one of several criteria for graduation, each of which contributes toward a final decision as recommended by Dr. David Berliner, past-president of the American Educational Research Association. To apply a single test (no matter how often a student may take it) for graduation will certainly result in massive class action lawsuits, which cannot be won because of the lack of empirical evidence to support such an approach.

It has long been recognized that the best measure of future performance in higher education is the student's grade point average in high school. Teacher grades have always been shown to be more accurate than standardized test results such as the SAT's.

One need only access the internet to find a listing of 53,800 articles on high stakes testing, most of which have been written during this decade and 80% of which are opposed to its use as a graduation requirement.

3. What about students with IEP's?

There is a potential for conflict with the provisions of the Individuals with Disabilities Education Improvement Act (IDEIA 2004). Since only a limited number of special needs students are permitted alternative testing under current law, how would they be accommodated, since it is unlikely most of them will pass the new test, much less the PSSA's? Despite what some may think, it is not heresy to suggest that all students cannot learn at the same level. The results of PDE's recent PAGE1 pilot project has shown that we do not have the answers to achieving uniform success for various subgroups, including ethnic minorities and those in poverty, as well as the handicapped.

4. What have we learned from past experience?

Pennsylvania has 35 years of experience, designing state assessments, from EQA to TELLS to PSSA. None of these tests has been particularly impressive in quality and have raised numerous issues of reliability and validity National studies of state assessment programs have not been kind to Pennsylvania or to most other states' assessment programs.

If we need another example of the problems with applying standardized tests, one need look no further than the PRAXIS examinations administered to prospective teachers as part of the certification process. Despite our best efforts and years of use, these tests are still seen, in far too instances, as a poor measure of teacher quality.

5. Why are we pursuing this issue?

Are our graduates really that bad? The answer has to be no. Most of us are graduates of the public school system and received a more than adequate education. The naysayers might argue that we have succeeded in spite of the schools we attended, but that argument is specious and without real supporting evidence. Are there some schools whose graduates do not do well? Of course, but the reasons generally do not have to do with the quality of the schools but the socioeconomic and demographic factors that impinge on the students, their families and communities, of which the schools are merely a reflection.

Is it a matter that we need more students prepared for college? Unless one works in a college setting, the answer will be no. We already have a huge excess of college graduates, which cannot be absorbed by the job market. It is not the excess of undereducated citizens but of overeducated ones that poses a problem. The proportion of careers requiring a college-level education has remained between 20 and 30%, since such statistics were first collected, more than 50 years ago. It would be much better to see students prepared to enter trade and technical training rather than higher education. It is these technical and vocational level jobs that cannot be outsourced to India or China.

What of the complaints by employers that graduates are not prepared when they apply for jobs? In the first place, the concerns do not usually lie with the subjects, which will be measured by the proposed tests. The weaknesses typically quoted in the research relate to dependability, honesty, cooperation and the other character traits that make a good worker and which are not going to be measured by the GCA's. Most employers believe that if they are given workers who have those qualities, they can teach them the content and skills they need to perform their tasks on the job. In some cases, the complaints about not being able to obtain the caliber workers they desire come from employers whose work settings and pay scales are not attractive to any but the most desperate applicants.

6. Where does PVAAS fall in this plan?

Pennsylvania has taken an important step to address a major weakness in standardized test interpretation by undertaking the implementation of the Pennsylvania Value Added Assessment System. This system avoids the pitfalls of cutoff scores, by looking at student growth on standardized measures. If a new set of tests is developed, then I must ask rhetorically whether districts will be able to take a value-added approach to applying the results rather than being bound by a cutoff point?

7. A real life example.

Some years ago, while driving home from the school where I was employed, my car began to make a loud noise under the hood. I stopped at a large garage with a well-trained staff (who probably could have passed the PSSA's) and was told that it was the valves and would require extensive and expensive service. As I drove on, I came to a small, somewhat shabby garage where a father and son worked. The son was in a class for mentally retarded students at my school (and probably could not pass the PSSA's or the proposed GCA's), but since the noise was getting worse I stopped and left him examine the engine. He slid under the car and was back out in a minute, saying with a smile that it was just a loose flywheel cover and that he had tightened it. There was no further noise. This is the measure of a student's competence.

7. Unintended Consequences

Drs. Amrein and Berliner from Arizona State University, two of the most respected researchers on high stakes testing, have applied Campbell's Law (A key concept in tests and measurement theory) postulated as the "uncertainty principle" in interpreting such data. That principle states "The more important that any quantitative social indicator becomes in social decision-making, the more likely it will be to distort and corrupt the social process it is intended to monitor." Their research has shown that the use of high stakes test results for student promotion and graduation does not have the desired effect of improving education, but does have numerous unintended consequences, such as increased dropout rates, cheating by administrators and teachers, reduced retention rate of teachers, and misinforming the public.

Major research groups such as the National Academy of Sciences have clearly stated that key educational decisions, such as graduation, should not be based solely on a test score. High-stakes testing punishes students, and often teachers, for things they cannot control. It drives students and teachers away from learning, and at times from school. It narrows, distorts, weakens and impoverishes the curriculum while fostering forms of instruction that fail to engage students or support high-quality learning.

8. Final recommendations.

While there are other points that can be made concerning this issue, the volume of testimony this committee has already received has covered them adequately without

Reiteration on my part. On behalf of the members of the Pennsylvania Association of Pupil Services Administrators, I submit the following recommendations pertaining to the issue of improving high school education.

- a. Do not use scarce resources to expand standardized testing. The state and federal government are cutting back on available funding and those millions could be put to better use.
- b. Provide the level of learning support needed to overcome the well-documented barriers to student learning, i.e., truancy, pregnancy, behavioral problems, disengagement from learning, etc. These will not be cured through better testing, better curriculum, or better teacher preparation. They can only be addressed through the counseling, health, psychological and social work supports identified in Chapter 12, Section 12.41, of State Board Regulations.
- c. Recognize the good that is occurring in most public schools and not the bad that may happen in a limited number of instances.
- d. Don't compare Pennsylvania or America's students to those from other countries, whose education systems, do not coincide with ours on so many factors. Countries that score well on such measures are either small, centralized systems such as Singapore or countries such as China and India where less than half the student population ever reaches the high school level. Compare them to our own vision of what is good for America.
- e. Base graduation decisions upon multiple criteria that are well researched and have an empirical basis. Do not permit any one criteria to have veto power over the rest.

Thank you for your attention. We will watch with great interest the future direction of the high school improvement initiative and in particular the Graduation Competency Assessments.

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Comments on the Proposed Changes to the State High School Graduation Requirements As Provided in Chapter 4 (Academic Standards and Assessment) Before the State Board of Education February 27, 2009

Good morning. My name is Mark DiRocco, and I am the Superintendent of the Lewisburg Area School District. I am here to support the proposed changes to the state high school graduation requirements as provided in Chapter 4 (Academic Standards and Assessments including the proposed Graduation Competency Assessments). I believe this will prove to be a much better method of assessing our students' knowledge of the academic standards than currently exists across the Commonwealth.

Currently, students must score proficient on the PSSA in their eleventh or twelfth grade year, or on a local assessment that is equal in rigor to the PSSA in order to graduate from high school. As was recently revealed in the Local Assessment Validity Study Report by Penn State University, only 5% of school districts were found to have materials and practices that are considered to be a valid local assessment system. Unfortunately, this means that large numbers of students are graduating from our high schools each year deficient in the standards.

The proposed assessment system will develop ten course exams in the core academic subjects and students would be required to pass at least six of the exams to meet graduation requirements. The implementation of the GCA's will not require more testing as most districts now have final exams for many of their core academic courses. The GCA's can be used in place of current final exams, or the school's current final exams can be validated by the Department of Education for use. Also, Advanced Placement and International Baccalaureate Exams can be used for graduation purposes. This provides for both flexibility and continued local control of curriculum and assessments if a district chooses to do so.

I know you have heard many concerns about the limitations of GCA's and standardized testing in general. However, you should also keep in mind that our students are subject to a variety of teacher made tests every day. These exams are truly the "highest stake" tests taken by students as they often determine passing or failing of courses, grade point average, and class rank. These are the most important factors in determining high school graduation, college admissions, and post-secondary scholarships. Teacher made tests are rarely evaluated for validity and reliability, and little professional development is devoted to effective test construction. While opponents to this proposal are quick to point out the potential of students not graduating because they may fail one GCA, I can tell you numerous incidents of students who did not graduate or pass on to the next grade level because of failing one classroom test at the end the school year. With the GCA proposal, students will have multiple opportunities to re-take the test and the school will be required to provide remediation. My comments are not meant to demean the fine work of our teachers and the wonderful job they do each day with our students. I am just bringing to light the fact that we give little time and attention to creating effective classroom assessment tools and evaluating their use in our schools.

I believe it is important that we stop demonizing standardized testing, which seems to be so popular today as a backlash to greater accountability for schools and higher expectations for our students. We should embrace the use of GCA's as tools to measure our progress, align our curriculum, help design our instruction, and meet the educational needs of our students. By implementing the new graduation requirements, students will be tested on a more in-depth set of knowledge in each subject area as compared to the broader design of the PSSA. Students who do not score proficient on an exam will be given multiple opportunities to re-take the exam and will only have to be re-tested on the modules of the exam in which they scored non-proficient. Schools will have more specific data to guide remediation efforts than currently exists with the PSSA. They will be better able to focus additional instruction on the specific areas of weakness that need addressed. This system seems much more equitable for students than having to score proficient on one high school PSSA exam or having to pass a series of classroom tests that may not be properly aligned with the standards.

It is also important that we establish a standard of proficiency for high school graduation and implement a system to ensure its rigor and consistency across the state. If Pennsylvania Students are to compete nationally and internationally for college admission and career opportunities, they must meet the same national and international standards of the students in the competition pool. Allowing five hundred school districts to establish their own local assessment system absent of state validation places our students and our Commonwealth at a distinct disadvantage.

In an increasingly competitive world, all our students need a rigorous education that will prepare them for the challenges of higher education and a complex workplace. Every child needs to be prepared to attend post secondary education, as most jobs of the future will require some formal learning beyond high school. Passing six end of course exams does not seem to be too much to expect for any student planning to pursue higher education. We must move away from the debilitating mindset of low expectations for our students and of ourselves as educators. We need to move ahead with confidence that our children are capable of much more than we have expected in the past.

I believe our students will meet the challenges we set before them if we have the courage to lead and the heart to care about their future. It is more important than ever that we, as leaders, step forward and speak positively about what our students can accomplish and how we will do "whatever it takes" to ensure they are successful. This is not the time to think about what is best for adults or bemoan the loss of traditions that no longer make sense in the modern world. We need to think strategically, and in the best interest of all our children to guarantee a quality education for every student. I encourage you to move forward in implementing the proposed high school graduation requirements and thank you for your vision of a better education system for our children.

Sincerely,

Mark DiRocco, Ph. D.

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Testimony Before The State Board of Education February 27, 2009

I thank you for the opportunity to testify today in support of the proposed Graduation Requirements and the concept of the Graduation Competency Assessments.

I am Harry Mathias, Superintendent of the Central Columbia School District. In addition to serving in public education for 25 years—10 as a mathematics teacher, six as a Curriculum Coordinator, and nine as superintendent—I have worked with numerous school districts and intermediate units in developing local assessment systems under the current Chapter Four Regulations. In addition, I serve with business and industry leaders on the Central Pennsylvania Workforce Investment Board.

I wish to express my support for the proposed graduation requirements.

The academic standards movement has improved the clarity and quality of curriculum for all Pennsylvania public school students. That quality, that rigorous and relevant education, should be reflected in the attainment of a meaningful high school diploma. I believe that the proposed graduation requirements will serve as a valid and reliable measure for graduation level attainment of the core academic standards. The current Chapter Four regulations could have provided that level of accountability as well; but, as the Penn State report released by PDE on Wednesday indicates, that is not the case for many students.

A quality assessment system provides multiple opportunities for students to show mastery (or in this case, proficiency). The current proposal does so. By providing opportunities to show proficiency through:

- the Pennsylvania System of School Assessment (PSSA) exams,
- valid and reliable local assessments,
- Advanced Placement and International Baccalaureate courses,
- course-based competency examinations, the current proposal provides all students with numerous options.

A quality assessment system should provide local teachers and school leaders the opportunity to develop valid and reliable assessments as alternatives to the PSSA. The current proposal does so.

A quality assessment system should be linked directly to the curriculum and instruction provided daily in classrooms. The current proposal, through the inclusion of graduation competency assessments, does so. This link is made even stronger with the development of a model curriculum based on the PA Academic Standards and Anchors.

In addition, I believe that the State Board and the Department should reinforce a culture of academic attainment and importance. The high school diploma should be based on defined, measurable and observable academic performances to establish and reinforce a

culture of academic importance. The current proposal provides for that important intangible.

In the Central Columbia School District, when our teachers and school leaders discuss our PSSA results and those students not proficient, there is no suggestion about our students not having the ability to become proficient. Rather, the discussion is focused on those students, who missed proficiency by an item or two, or those students who do not perform well in standardized environments, or most notably, those students who see no value in the PSSA and have no motivation to focus and perform well. Providing students with motivators is a good thing. Providing students with numerous methods and opportunities to show their academic ability is a very good thing. The current proposal does that.

I respectfully suggest that the State Board and the Department consider some suggestions:

- 1) Students who demonstrate proficiency on alternate measures such as the GCAs or reliable local assessments, should be considered proficient in terms of graduation requirements and the school's adequate yearly progress. Therefore, the PSSA should <u>only</u> be given to those students still in need of meeting the assessment graduation requirement and should not be the only assessment measure of AYP.
- 2) The logistics of the Graduation Competency Assessment system must make them accessible, timely and reasonable. Feedback must be timely and formative. And, most importantly, the assessments must be reliable and valid for the minimum proficiency level in the applicable academic standards.
- 3) The targets on the GCAs and PSSA must be clearly defined and static. Despite your efforts, the methods to establish cut scores and the realignment of cut scores leaves many to believe that norm-based, rather than criterion-based measures have been utilized in the past. I suggest you do whatever it takes to be transparent in this process.
- 4) Schools choosing to develop valid and reliable local assessments should be encouraged to do so for the benefit of their students, without unreasonable and inconsistent parameters placed on those assessments. Local assessments proven valid in measuring the academic standards and meeting reliability measures should be utilized in assessing graduation competency and should not be held to a higher standard.
- 5) A quality assessment system considers the needs of those students identified as "special needs". Providing for the attainment of graduation requirements through the IEP goals will address the unique learning needs of a large population of students.

Finally, I suggest one further motivator for students and a method of linking the K-16 educational system provided by the Commonwealth. Those students who are proficient or higher on all components of the 11th grade PSSA should be granted automatic acceptance into the State System of Higher Education.

In conclusion, I offer my support for the proposed Graduation Requirements.

I commend the State Board and Department for your work. Thank you for this opportunity.

Harry C. Mathias, Jr., Superintendent Central Columbia School District

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Cynthia J. O'Hora 100 Stetler Ave. Shamokin Dam, PA 17876

Testimony to Pennsylvania State Board of Education Regarding the Graduation Competency Assessments Proposal Friday, February 27, 2009

All the views and opinions I provide are my own. I do not represent the Selinsgrove Area School Board or the school district.

I believe our children can succeed. I believe the Graduation Competency Assessments are an excellent way to focus our high schools on each student's success.

This is not a discussion about what our children can do. This is a discussion about what we, the adults, can do. This is a conflict of priorities. It is the conflict of the needs of our businesses, our communities and most importantly our children, against the goals of teachers, administrators and school boards.

One argument against GCA's is the local control of schools dogma. Preserving local control is not about the empowerment of children through an education focused on developing vital skills. Local control is about preserving the primacy of the power of a few adults. When we prioritize local control over academic competency, we bind our children to their communities.

Local control has one foot permanently cemented in the past. The local control model harkens back to a time when people were born, raised, lived and died largely, in the same community. But the harsh reality of today's economy means that their community may no longer be able to provide them with a viable future. Today's worker must be mobile. They may move across the county, across the state or across the country to find a job that pays a living wage.

It is critical that we develop our children's skills and their knowledge with a sharp focus on achievement and an unwavering faith in their ability to succeed. If we provide them with an excellent preparation: they will be able to adapt, to succeed, and yes, even to dare to excel.

It seems to me that the Penn State study that found that 5% of local final exams are actually aligned to the standards is an indictment of local control of high school graduation.

We do not serve the needs of families or children when we have 500 school districts "doing their own thing". Many children move during their 13 years in public education. Our current, education model places all of them out of step. I first confronted this problem when we moved from Wallingford to Lancaster County. Our son learned the multiplication tables in second grade, in Wallingford. He suffered through repeating them in 3rd grade in his new school. When we moved from Lancaster to this area, he was required to repeat a technology course and a history course in high school. This is foolish and worse it is wasteful. It wastes the student's time and it wastes precious resources.

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Graduation Competencies are an important step towards providing a consistent education to every Pennsylvania child regardless of where they live or where they move.

As a school board member and parent I have heard many excuses for why our children are not more successful. One excuse given is that the Pennsylvania Academic Standards are too vague. The administrators tell me, they are unsure of what to focus on in the classes. You must act to end all this confusion. Final exams set clear goals for both the educator and the student.

Finally, some people will tell you that it is not possible for our children to pass these exams. This past weekend, I had an excellent lesson in the power of possibilities. My daughter is a senior at Penn State. For the second year, she has been devoting hundreds of hours volunteering for THON. In August, Jen launched into the campaign. She was filled with hope and determination. Along with 15,000 other inexperienced, non professionals she labored for months preparing for the events. She joined her fellow THON'ers standing in the rain, on street corners, canning. She told me is was all FTK, For the Kids.

I was worried about her high expectations. After all, it is a bad economy. Many Pennsylvanians have lost their jobs. Cash strapped corporations were not likely to be as generous this year. I urged her to temper her expectations. Wisely, she did not. Nor did her fellow THON'ers.

Jen invited her father and I to join in the last 2 hours of THON. We went because we support our kids. I also went to help her cope with the "defeat" of not beating last year's \$6 million. The BJC throbbed with unbridled enthusiasm. Finally, the big moment came. The tally cards were lifted one by one. The impossible had been achieved. They had raised over \$7.4 million dollars.

If a loosely joined, bunch of amateurs can achieve that in the face of such adversity, then certainly, our well organized high schools that are staffed with highly qualified educators can ensure the success of all our children on these final exams.

We are faced with a choice. We can surrender our children's future to those who focus steadfastly on what cannot be done. Or we can place our children's possibilities with those who are dedicated to setting lofty goals and achieving them.

I support the Graduation Competency Assessments because I believe in our children.

I urge you to believe in them, too.

Thank you,

Cynthia J O'Hora
School Board Director – Selinsgrove Area School District
http://home.ptd.net/%7Ecohora/

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Testimony Richard Mextorf Superintendent Loyalsock Township School District

Thank you for the opportunity to speak with to today. My name is Richard Mextorf, and I am Superintendent of Schools at Loyalsock Township School District.

The institution known as public education has a long history of creating academic winners and losers. The winners went on to college; the losers were relegated to unskilled or, at best, semi skilled labor. This mass production model of creating academic winners and losers could tolerate an acceptable loss rate because there was work with family sustaining wages in the heavily unionized unskilled labor market. We all remember the stories of people working in factories pushing a broom for \$20 per hour.

In the 21st century, not only have those jobs disappeared, any job that can be digitized, outsourced, or automated has gone or is in danger of going overseas. If a computer can do it faster, if someone can do it cheaper, or if a machine can do it more efficiently, the job will be outsourced or sent offshore.

This has tremendous implications for public education. In the 21^{st} century, we cannot afford to produce academic losers. The jobs that have been the repositories for these students are gone forever. In the 21^{st} century, our acceptable loss rate needs to be zero. We don't have one kid to waste.

This reality is a tremendous opportunity for public education. Our system has been built to recognize time as the constant and learning as the variable. We must reverse this systemic flaw. We need to change the system to fully engage every student in meaningful learning. This includes setting the bar high for students and providing support and multiple opportunities for students to meet those expectations. Students demonstrate intelligence in a variety of ways. Accordingly, they should be assessed in multiple forms and given multiple opportunities to demonstrate understanding.

GCAs are a step in the right direction. Assessments are administered at the end of each course, which increases relevance. Allowing districts to develop their own assessments gives teachers a seat at the table as partners in the process. The Department could be of assistance to districts by using the Standards Aligned Systems (SAS) model to develop assessment anchors for each course. Additionally, a system where districts could submit final exams to the Department for feedback and approval would help with validity and reliability. The Department could also be of great help to districts in designing multiple forms of each assessment, which would allow students to demonstrate understanding in a variety of ways.

One idea worthy of consideration is moving the PSSA from grade 11 to grade 9. Although this would require a modification of the assessment for ninth graders, it would

serve as a feedback loop to guide a course of study for students, rather than an autopsy late in students' careers.

We must be mindful of our children with special needs in this process. Many students with learning disabilities are fully capable of demonstrating proficiency. However, we must be mindful of those that cannot meet minimum expectations and design different assessments that are appropriate for these students.

All students need to be proficient in core competencies to be successful in the 21st century. However, students also need an education that prepares them for continuous learning, to be civic contributors, to be culturally aware, to be economic contributors, and to lead balanced, meaningful lives. We must not allow competency testing to minimize our responsibility to develop the whole child.

Change of any kind is difficult. However, if we want the doors of opportunity to remain open for all students upon graduation, then we must set the bar high and develop multiple ways to assess students' readiness. GCAs are a step in the right direction, and can be part of wholesale systemic change that will prepare students for their future, rather than our past.

Respectfully Submitted Richard J. Mextorf, D.Ed. Superintendent of Schools Loyalsock Township School District