

Great Valley School District

47 Church Road
Malvern PA 19355
Phone 610 889-2100, ext 2112
www.gvgsd.org



BOARD OF SCHOOL DIRECTORS

March 24, 2008

Independent Regulatory Review Commission
333 Market Street
14th Floor
Harrisburg, PA 17101

RECEIVED
2008 MAR 31 AM 9:29
INDEPENDENT REGULATORY REVIEW COMMISSION

Dear Commission Members:

We are sending you this letter to register the opposition of the Great Valley Board of School Directors to the State Board of Education's proposed regulatory changes to revise the current high school graduation requirements under the Chapter 4 regulations. Those changes would require a student to either demonstrate proficiency on the 11th grade PSSAs OR pass a series of standardized high stakes assessments in order to receive a high school diploma.

We stand in opposition for the following reasons:

1. Seniors in the first years of implementation of newly developed GCAs may be unfairly denied a diploma based on irregularities and flaws in scoring.
2. Development of GCAs as end of course exams will force districts to narrow curriculum. This will force a loss of control of curriculum in order to meet the state-wide curriculum demanded by the content of the GCAs.
3. The local assessment option has been designed with obstacles and expense that render it almost impossible to consider, including required validation by state-approved vendors on all assessments and with every subsequent change.
4. High stakes paper and pencil testing as the only criteria by which a student can earn a diploma contradicts all research on diverse learners and multiple intelligences. Some of our very successful graduates may have been denied a diploma if not given alternative means to demonstrate mastery of standards as in accordance with current Chapter 4 regulations.
5. Additional required standardized testing adds stress to students already heavily burdened with testing for multiple purposes (PSSA, SAT, AP, PSAT, etc.).

Independent Regulatory Review Commission

Page 2

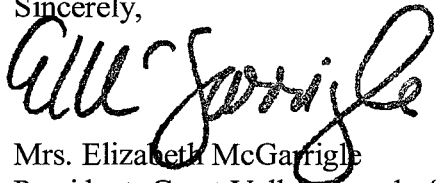
March 25, 2008

6. Efforts and resources to improve student achievement should be endorsed at the elementary level, not with a high stakes test at the end of a student's public school experience.
7. Given the Act 1 limitations on tax increases, school districts have limited ability to fund potential new costs associated with the administration of GCAs, as well as potential remediation necessitated in all of the six specific courses.
8. The financial impact on state and local budgets and taxpayers for the development, validation and scoring of state exit exams has not been determined, nor do districts have any indication that these costs will not be passed back to local taxpayers after initial tests are developed.

In closing, we assert that we oppose the State Board of Education's proposal to enact Graduation Competency Assessments and any other regulation or legislation that usurps the authority of the Great Valley School District to determine whether our students have earned a high school diploma. We will be sharing this letter with state and our local legislators, members of the Senate and House Education Committees and the Independent Regulatory Review Commission.

Thank you for considering our position on this issue and we urge you to also oppose the enactment of these regulations.

Sincerely,



Mrs. Elizabeth McGarrigle
President, Great Valley Board of School Directors
On behalf of the Great Valley Board of School Directors

CC: State Board of Education