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**From:** Weber, Marie [mweber@ldsd.org]  
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**To:** IRRC

MAY - 6 REC'D

INDEPENDENT REGULATORY  
REVIEW COMMISSION

9:50 AM

As your constituent, I urge you to 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. My concerns include.

\* There are numerous reasons I oppose the GCA proposal, but first and foremost I do not believe that standardized tests are the best determination of student achievement. The thought of denying students a high school diploma - which has long-term negative effects on their lives - because they didn't score "proficient" on a statewide test truly concerns me.

\* At a time when we know that Pennsylvania's public education system lacks the funding it needs by over \$4 billion in order to help every student meet the state's academic standards, it is irresponsible to impose high-stakes testing on our students. In addition, no analysis has been done on the cost of developing and administering the GCAs, let alone what it would cost to remediate those students who do not score "proficient" on the exam.

\* 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.

\* There is no quicker way to disengage students from the learning process than to force them to learn, for the sake of a test, something they see as irrelevant and unimportant. What's overlooked is that every minute that students (and teachers) spend memorizing information that will be mostly forgotten by the time the students receive their diploma, is time that students could have -- and should have -- spent learning something more useful to them. Requiring every student to pass a Chemistry exam in order to graduate from high school makes as much sense as requiring every college-bound student to complete a certification in auto mechanics!

We believe there are more important places for the Commonwealth to put its resources. Pennsylvania could follow the example of several states that have begun to align their standards according to the work done by the Partnership for 21st Century Skills. This organization, which was formed via a collaboration between educators and business leaders, is developing standards and assessments for competencies that include collaboration, innovation, creativity, communication, and critical thinking skills.

These critical competencies are taught in classes such as music or art. Research has shown that students across the country are losing opportunities to learn these competencies as school districts are forced to shift time away from these subjects in order to prepare students to pass high-stakes tests. Please do not allow that to happen in Pennsylvania! Talk to your colleagues on the Education Committee and ask them to oppose the GCA proposal. Thank you.

Sincerely,

Marie Weber  
219 Hanover View Circle  
Harrisburg, Pa 17112