

#2696

RECEIVED

**From:** Lawrence A. Feinberg [lfeinberg@thelocalgroup.com]  
**Sent:** Monday, May 12, 2008 6:05 PM  
**To:** IRRC  
**Subject:** GCA's #2696

2008 MAY 13 AM 9: 40

INDEPENDENT REGULATORY  
REVIEW COMMISSION

I am writing on behalf of the Southeastern Pennsylvania School Districts Education Coalition (SPSDEC), a regional grassroots advocacy group with representatives from school districts in Delaware, Montgomery, Chester and Lehigh counties.

Please enter the attached letter into the public record on Graduation Competency Assessments, IRRC# 2696. Please do not hesitate to contact me if you require any additional information.

Thanks and Best Regards,  
Larry Feinberg

Lawrence A. Feinberg, Co-Chairman  
Southeastern Pennsylvania School Districts Education Coalition  
LFeinberg@TheLocalGroup.com  
Phone: 610-896-3880  
Fax: 610-896-3890  
Cell: 215-919-3449

5/13/2008

#2696.

RECEIVED

2008 MAY 13 AM 9: 40

**Lawrence A. Feinberg**

2023 Olcott Avenue

Ardmore, PA 19003

Phone: (610) 896-3880

Fax: (610) 896-3890

Email: LFeinberg@TheLocalGroup.com

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Honorable James J. Rhoades  
Chairman, Senate Education Committee  
Via Fax: 717-783-9149

Honorable Raphael J. Musto  
Minority Chairman, Senate Education Committee  
Via Fax: 717-783-4141

May 12, 2008

Dear Senators Rhoades and Musto,

I am a third term school director in the School District of Haverford Township. I serve as Chairman of the Delaware County School Boards Legislative Council and as Co-chairman of the Southeastern Pennsylvania School Districts Education Coalition (SPSDEC), a regional grassroots advocacy organization with representatives from school districts in Delaware, Montgomery, Chester and Lehigh counties. On behalf of SPSDEC, I am writing to urge the Senate Education Committee not to approve the State Board of Education's proposed Graduation Competency Assessment revisions to Chapter 4 regulations.

**Please enter this letter into the record for the May 14<sup>th</sup>, 2008 Senate Education Committee public hearing on Graduation Competency Assessments.**

In the House, HB 2452, which would preclude the State Board from enacting or funding the GCA's unless there is express authority from the General Assembly, has received strong bipartisan support from our Southeastern PA legislators, with representatives Civera, Donatucci, Leach, McIlvaine Smith, Micozzie, O'Neill, Quigley, Rubley and Vitali co-sponsoring. We appreciate their efforts on behalf of our students and our taxpayers.

As of May 8th, over 153 school boards have passed resolutions opposing the imposition of this additional battery of tests. Almost every educational advocacy organization in the state opposes them. And significantly, more than half of the members of the State House of Representatives have already signed on as sponsors for HB 2452. Why?

- Pennsylvania already has a set of statewide assessments, the PSSA's that were developed to measure student performance against the state's academic standards. We already know which students and which districts are not testing at the proficient level.
- Instructional time is already impacted on up to 25 days per school year directly practicing for and administering the PSSA's. Additionally, we administer local assessments, tests, quizzes, PSAT's, SAT's, ACT's, AP exams and NAEP's. Our students are already tested enough.
- The state is already spending over \$32 million per year on the PSSA's. It is estimated that the new GCA's will cost an additional \$50 million to develop and \$40 million per year to administer.

We do not want to give up another minute of instructional time or spend another dollar of taxpayer money on more testing unless we will learn something from that testing that will help us improve our students' academic performance. This GCA proposal will not do that.

PDE already knows which districts are in need of assistance; perhaps they should be looking at school districts with successful student achievement as exemplars, respecting and validating their local assessment systems. The Great Valley School District had over 92 percent of their students proficient on the PSSA's while spending \$400 per student less than the Costing Out Study target level. Central Bucks had over 86 percent proficient while spending \$2000 per student less than the target level. If our goal is to improve student achievement, instead of spending \$50 million to develop additional tests, why not spend a little time finding out what our "successful PSSA" districts are doing and communicating those best practices to districts statewide?

We do not believe that our students will benefit if we simply replace our local end of course assessments with the proposed GCA's as has been suggested by proponents of the new exams. Over the past ten years our local school boards have fostered, and curriculum directors have developed curricula with local assessments that are tied to the State academic standards. They are reflective of the concerns, needs and resources of our diverse local communities. We have significant concerns with the loss of informed local control over curriculum, instruction and graduation requirements. While a "voluntary state curriculum" might benefit districts with limited resources, we do not believe that realigning our curriculum with the narrow scope of GCA's would be an improvement for our districts or our students. This will only result in "dumbing down" the curriculum in our higher performing districts and narrowing the curriculum overall.

Hardly a day goes by in the education community without us hearing about the importance of 21<sup>st</sup> century skills. In addition to reading comprehension, math and science, these include computer and technology skills, critical thinking and problem-solving skills, ethics and social responsibility, written communications, teamwork and collaboration, oral communications, lifelong learning and self-direction, leadership, creativity and innovation, media literacy and global awareness. How will narrowing our local assessments and curriculum to focus on passing 10 more paper and pencil standardized tests help to foster those skills?

The Governor's Commission on College and Career Success, which recommended the GCA's, had virtually no representation from administrators or board members in southeastern

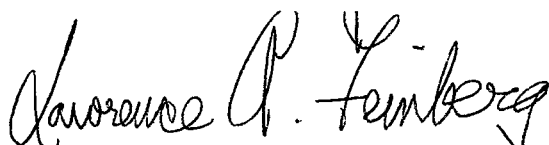
Pennsylvania's 61 suburban school districts, where 20% of the state's students are enrolled. Of those 61 suburban districts, only one, Chester Upland, which has been under state control for several years, has formally supported the GCA proposal.

The Commission report notes that statewide, "*Approximately one quarter of our students do not graduate on time; and of those that do, less than half enroll in college upon graduation.*" More than three quarters of our 61 school districts sent 80 percent or more of their graduates to college. More than a third sent 90 percent or more to college. While we certainly appreciate the challenges that districts like Philadelphia, Chester Upland, Allentown, Pittsburgh and Erie are facing, a policy that is geared towards addressing their daunting issues should not be mandated on all school districts. Wouldn't \$40 million per year be better spent helping those struggling districts with best practice programs that we know have worked, like early childhood education, more time on task, increased parental involvement, lower class sizes or recruiting, training and retaining highly qualified teachers?

Colleges and employers absolutely have the right to know that diplomas mean something. School boards and administrators have the responsibility to implement and monitor policy that will enhance student achievement. Perhaps we should be talking about practical ways of getting that done.

If the goal is to improve student achievement then withdraw this proposal and let's have a vigorous debate that includes input from all stakeholders. Educational policy should be focused on effectively utilizing taxpayer dollars and limited instructional time to improve student achievement - not on implementing a statewide, costly and needless program of redundant testing.

Sincerely,

A handwritten signature in black ink that reads "Lawrence A. Feinberg". The signature is written in a cursive style with a large initial "L" and "F".

Lawrence A. Feinberg, Co-Chairman  
Southeastern Pennsylvania School Districts Education Coalition

cc: Senator Domenic Pileggi, Senate Majority Leader  
Senator Joseph B. Scarnati, III, President Pro Tempore  
Senator Robert J. Mellow, Minority Leader  
Senator Andrew Dinniman  
Senator Ted Erickson  
Senator Robert Tomlinson  
Senator Anthony Williams  
Senator Connie Williams