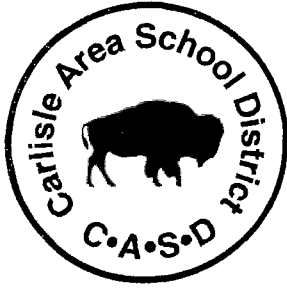


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CARLISLE AREA SCHOOL DISTRICT

623 W. Penn Street
Carlisle, Pennsylvania 17013
Telephone: 717-240-6800

Mary Kay Durham, Superintendent

2696

RECEIVED

JUN 18 2008

PA. STATE BOARD OF EDUCATION

INDEPENDENT REGULATORY REVIEW COMMISSION

JUN 30 AM 9:45

RECEIVED

June 13, 2008

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

Dear Mr. Buckheit:

RE: Academic Standards and Assessments, IRRC#2696 and Regulation #:6-312

The Carlisle Area School District Board of Directors has reviewed the proposed rulemaking from the State Board of Education and information from Secretary Gerald Zahorchak regarding the Graduation Competency Assessments. The Board of Directors respectfully requests that the State Board of Education and the Pennsylvania General Assembly reject the *current* proposed Graduation Competency Assessment regulations.

--Use of GCAs will not address the educational concerns of students who need additional help to meet graduation requirements.

-- Adoption of the GCAs will decrease the amount of time available for instruction. On an average the administration of the reading, writing, math and science PSSA decreases instruction by at least fifteen hours at the eleventh grade where the tests are administered. Students who take the ten proposed GCAs will lose a minimum of 10 hours instructional time.

-- GCAs will increase paper and pencil *standardized* testing. Although the GCA proposal permits schools to use a local assessment option, it establishes limitations, including the elimination of the ability to use assessment strategies now available to local entities and requires local tests to be closely modeled to the GCAs.

-- In states that administer high stakes exit tests the dropout rates have increased. Based on results from previous PSSA tests and other forms of standardized tests it can be assumed that both minority and ELL students will be adversely affected by graduation competency assessments.

-- Career and technical education students may be adversely impacted by the GCA proposal as these students spend much of their time learning information to prepare them for specific professions. Carlisle High School is a comprehensive high school that supports five vocational programs. Nearly fifty percent of a vocational student's day is spent in classrooms learning a specific trade.

-- The cost to develop, distribute and administer the GCAs has yet to be fully determined and realized. Given Act 1 limitations on tax increases, school districts have limited ability to fund these potential new costs.

Respectfully Submitted,

Fred D. Baldwin
President, Board of Directors