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June 4, 2009

Ms. Anne Dorman  
Student Representative, Pennsylvania State Board of Education  
333 Market Street, 1st Floor  
Harrisburg, PA 17126-0333

Dear Ms. Dorman:

I am writing to you to express my opposition to any regulation which would establish the passing of any large-scale assessment as a requirement for high school graduation in Pennsylvania, including the General Competency Assessments (GCAs) proposed by Secretary Zahorchak.

While the declared goal of utilizing such high-stake measures as the GCAs is to improve the educational achievement of our graduates, studies show that the opposite occurs: large-scale assessments do not help those students who pass them but do harm those who do not. The reality of the experience of other states which have imposed such a requirement is that the only way in which these tests apparently "improve" the skills of graduates is by causing all but the most successful students to drop out of school entirely--thus eliminating them from studies of graduates' skills, as they never make it to that level.

Further, imposing tests such as the GCAs is inherently discriminatory, depriving the most exquisitely vulnerable groups of students of the right to education--for example, special education students, English Language Learners, and those students in poverty areas, both urban and rural--as their education is scarcely the equal of that of mainstream students and/or those who reside in affluent areas. Thus the GCAs would place an unequal burden on at-risk students, many of whom are members of minority groups, and clearly discriminate against them. Use of the GCAs would predictably only widen that lamentable "Achievement Gap" on the demise of which so much time and money and printer's ink has been spent.

There is also the very real question of the justification for spending huge amounts of taxpayers' money on an unnecessary and ineffective enterprise--especially at the present time, when not only are state budgets so strapped that necessary services are being cut back, but also when the new federal Secretary of Education, Arne Duncan, intends to develop a broad national curriculum and related assessments--and already has the announced support of 46 of the 50 states, including Pennsylvania. (There has been no suggestion of using set levels of performance on these planned assessments as graduation requirements.) This national effort is off and running with almost unanimous support from the states--so why spend well over \$200,000,000 of Pennsylvania taxpayers' money on an assessment which will very likely be obsolete before it ever sees the light of day?

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Pennsylvania already has a large-scale assessment, the Pennsylvania System of School Assessment (PSSA), used for evaluation of core skills at several levels, including the 11th grade. Why do we suddenly need another large-scale assessment of students in that same grade?

If we wish to improve the educational achievement of our students, let us spend our time, money, and effort in such areas as are known to exert an effect on it--pre-school education, the quality of instruction, the availability of resources and of support services, just to name a few--rather than in developing and administering a needless, useless high-stakes assessment program which clearly cannot produce the desired results; which will cause the curriculum to shrink still further away from music and the arts and physical education and the opportunity for those "teachable moments" in all content areas; and is of value not to the taxpayers or to the students of Pennsylvania but only to the test developers. "Teaching to the tests" will be alive and well, but students' education will not.

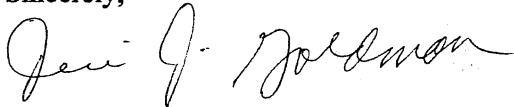
Graduation requirements should instead encompass varied components, evaluated via multiple measures, including real-life tasks and other performance-based assessments, and offering differentiated paths to the same goal.

Thus I support the proposal of the Coalition for Effective and Responsible Testing (CERT), which provides a more flexible program for assessing applicants for graduation, the Keystone Exams 2.0. Among other stipulations, at this point the Keystone Exams are to be used only voluntarily by local districts, but if they were in the future to become sufficiently robust, they could replace the 11th grade PSSA. Further, if at that point the Keystone Exams were to be state mandated, there is a limit (20%) placed on how much those final exams would "count" toward graduation, so the specter of an exit exam and the many problems that such a procedure has caused elsewhere would not just arise under another name.

As you doubtless know, CERT has the support of innumerable professional and service organizations in Pennsylvania's education community, and I am respectfully requesting that you lend your considerable influence to rejecting the GREs and to utilizing instead the Keystone Exams.

Trusting in your commitment to the welfare of Pennsylvania's students and of its taxpayers who support those students, I thank you for listening.

Sincerely,

A handwritten signature in cursive script that reads "Jeri J. Goldman".

Jeri J. Goldman, Ph.D.