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March 10, 2009

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

Dear Mr. Buckheit:

Attached are written comments that the Pennsylvania Association of Elementary and Secondary School Principals want to enter into the record concerning the revised State Board of Education regulation 22 Pa. Code, Chapter 4, Academic Standards and Assessment (#006-312) otherwise known as the Graduate Competency Assessment Proposal.

Thank you.

Sincerely,

*William R. Hartman Jr.*

Dr. William R. Hartman, Jr.  
PAESSP Executive Director

*Joseph P. Acri*

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PAESSP Assistant Executive Director

Encl.

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*Serving Principals, Assistant Principals and Supervisors*

**Written Comments Provided to the Pennsylvania State Board of  
Education  
Regarding Regulation ID#6-312(2696)  
Graduation Competency Assessments (GCAs)**

**Submitted by  
The Pennsylvania Association of Elementary and Secondary School Principals**

The Pennsylvania Association of Elementary and Secondary School Principals (PAESSP) opposes Regulation ID#6-312(2696) in its revised form. We join with other state education associations and non-profits in opposition because of our concern for the welfare of the children we serve.

First, let us be clear that we do not oppose the concept of school, district and state accountability. There is a clear difference between using test data as one measure of how a school, district or state is providing for a quality education and using such data to deny a student a high school diploma. The way the current regulation is worded, the student appears to be the only one to have severe and perhaps far-reaching consequences for a failure to pass six graduate competency examinations yet to be developed by the state.

We believe that the Graduate Competency Assessments (GCAs), as proposed, are unsupported by research; divert large amounts of funding from proven achievement improvement measures; will be harmful to a large number of potential high school graduates; increase cost to school districts between 10 to 20 percent; open a window for potential law suits that will further divert educational funds into legal defenses; *assume* that passing these exams will assure a quality product; push instruction toward standardized measures while what is needed is more individualized, customized instruction; and finally, that the unintended consequences of such a regulation will more likely diminish the quality of education in Pennsylvania schools than increase it.

**We will briefly address these issues:**

**Unsupported by Research/Financial Considerations**

The potential harmful effects of GCAs are enumerated by various, highly respected organizations, such as the American Psychological Association. This research is readily available by conducting a Yahoo or Google search of "high stakes testing." While some (a minority) of studies will point out that high stakes testing may be reliable compared to other tests, no proof is provided that requiring a student to pass a high school competency exam or series of exams enhances a student's ability to be a productive citizen or that such exams capture the scope of a student's learning through 13 years of schooling. To the contrary, most students who fail to achieve competency, as defined by an arbitrary pass number selected by someone, demonstrate that they are capable of attending college without remediation or can successfully enter the workforce.

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In testimony before the Pennsylvania Senate Education Committee, a representative of Achieve, Inc., an organization formed by the nations governors and corporate leaders in 1996 to promote assessment and accountability and a leading advocate of high stakes testing, responded when asked for proof of the value of Graduate Competency Exams, “it is too early to provide such evidence.” In fact, the representative’s number one assurance was that many other states are doing it – you won’t be alone. This is not a justification for a quarter of a billion dollar investment over the next five years, on top of the current PSSA expenditures.

Achieve, Inc.’s studies highlight the need for certain proven methods to be in place to assure the success of high school students to reach proficiency. Without certain remediation, interventions and programs, the effectiveness of high stakes testing achieves nothing but to report what we already know.

*One must ask the question, with such conflicting research, with the possibility for harmful effects on high school graduates and with 24 major educational agencies opposing the regulation, why the rush to implementation?*

There is a substantial difference between an idea and proven practice. The implementation of GCAs as proposed requires the expenditure of a quarter of a billion dollars over five years on an idea that is not proven to be good practice. If you examine much of the “research” provided in support of this idea [GCAs], you will find that the research focuses upon identifying the problem, e.g., many students graduate yet have not demonstrated proficiency as defined by the PSSA. This is a statement that even those opposing GCAs would not necessarily argue with, however, there is a huge difference between providing research that identifies a problem and presenting research that supports a solution. Little or no research is presented that demonstrates how GCAs will improve student preparation for successful lives in the workforce or college.

Finally, research does clearly demonstrate that certain types of school interventions help students acquire needed competencies to become contributing members of society. *We propose that our limited funds should go to those proven practices rather than the unproven value of GCAs.*

### **Potential Lawsuits**

There is substantial evidence that the implementation of GCAs as a requirement for a diploma results in a flurry of lawsuits that states and districts are required to defend. California, Alaska, Massachusetts and Indiana are currently involved in such suits, among others. There are also reports of students moving from Texas or attending private or parochial schools to complete their senior year in high school elsewhere rather than have 13 years of education negated as a result of a test score and suits are pending.

*Why would the state subject itself and school districts to the unnecessary diversion of funds to legal actions based upon an unproven idea?*

### *Assumptions About the Ability of the Tests to Capture 13 Years of Schooling*

*After 13 years of schooling, would you stake your future on your ability to pass a minimum of six high stakes tests?*

First, one must assume that the tests accurately reflect the curriculum to which you have been exposed. Where is the assurance of this? We do not even have state model curricula constructed that assure reasonable universal expectations. Shouldn't we have the support in place prior to the requirement? Also, who will be designing these tests? You are proposing a regulation and we have not yet even developed a test, nor do we know the validity or appropriateness of what is to yet be developed. This seems like an unreasonable leap into the unknown. Without these preparations, how will today's sixth graders possibly be assured that they have had the adequate preparation for the as-yet-undeveloped test and curricula.

Secondly, one must assume that you will remember all that you have been taught – this is contrary to what we know about learning theory. While one might be able to pass a test as a freshman immediately following Algebra I, there is no assurance that the same individual has retained that information as a graduating senior. In fact, memory research would suggest otherwise. Therefore, what was intended to prove competency as a graduating senior, may not accurately reflect what you know at the time of graduation.

Third, the test has not been put to the test. There is a large assumption in this regulation that someone or some institution will be able to ascertain what an individual needs to know to be successful in life *based upon his/her ability to pass six high stakes tests*. This is a huge and dangerous assumption. We would suggest that before implementing the regulation, the tests should be tested to determine their usefulness in predicting success. If the Board of Education, PDE and the advocates of such testing are so certain that these tests capture what is needed to be awarded a high school diploma, and accurately measure a graduates ability to function successfully in life, that they first take this magnificent predictor, and if they fail to pass all six high stakes tests, they relinquish their high school diplomas.

*Certainly we would not want individuals incapable of demonstrating the ability to master a high school diploma making such a monumental decision that will impact all potential graduates to come.*

### *Curricula Alterations*

High stakes testing has been proven to have widespread impact upon curricular focus and attention. The PSSA has already ushered in an era in which more and more time is devoted to the remediation of math and reading and less and less time devoted to social studies, the sciences and the arts. High stakes testing actually creates a standardized environment where emphasis is placed upon the regurgitation of facts. It also assumes that if all individuals are educated to acquire a minimum set of competencies in math and

science we will have created a better educated citizenry. It is ironic to observe how high stakes testing drives us back to the old, outdated factory models of education long ago rejected as nonproductive to the needs of modern citizens. Ask any principal if the PSSA and other high stakes testing have changed how we educate our youth. Ask them if the curricular opportunities for students are broader or more narrowed. Ask them if we are focusing on students' strengths or weaknesses. Good educational practices support the findings that a student develops faster and more fully when his/her strengths are emphasized. Ask art and music educators if their curricular areas have increased or diminished. Ask employers whether they needed graduates that are well rounded or display minimum competencies on high stakes tests.

Greek and Roman societies set the standards for modern Western Civilizations and the importance of an educated citizenry. Both emphasized the need for art, music and physical education in combination with academics. The current state obsession with high stakes testing is having an unintended and destructive impact on the depth and breadth of offerings in schools and actually drives us from the individualized, personal, customized development of each child so needed for today's citizens.

### **Unintended Consequences**

It should be noted that the intention of the advocates for high stakes testing, particularly GCAs is honorable. We are not disputing the motives or intention of these individuals and groups, but we believe the facts merit a rejection of the implementation of these regulations at this time. The process has been too hurried and is extremely unsupported by credible research to support this unknown leap to action. The board has gone out two different times to gather information and nothing has changed over the last 15 months. There has been no credible evidence put forth by any group that guarantees if we make their recommended changes, will result in students better able to be prepared for the work force or college in 2015. Other groups opposing this regulation have reiterated possible consequences beyond what we have in this paper. *Please consider carefully their contributions and concerns.*

### **Business Community**

While some representatives from the business community have testified on the importance of GCAs, they represent a very small number. If we are to believe the Secretary of Education, we are at a crisis with the businesses being very concerned. Yet, when we have principals engaging local businesses in their community, we find most do not even ask for a copy of the student's diploma or transcript. In fact, it is very rare for a potential employer to ever ask for the student's transcript to determine if they are proficient under PSSA.

### **Summary**

Thank you for your consideration of our position on this issue. We reiterate that we do not object to accountability, or even the use of tests to determine the progress of institutions such as schools, districts and the state to provide what is needed to assure a

quality education. We do, however, believe that imposing six high stakes test as a requirement for graduation is an unsupported, dangerous idea. It holds only the students accountable and not the institutions. It inhibits students from pursuing viable career opportunities because of a score that may or may not be reflective of their ability, which may or may not be the failure of the student but rather the failure of one or more institutions charged with their education. It is an idea that is to be implemented without any of the basic support structures in place that even the advocates of such testing know must be in place for success. It will require current sixth-graders to pass a test that does not yet exist based upon a curricular model that the state has not yet provided to pass six high stakes test that have not yet been validated or tested themselves. Make no mistake, these test are not a "basket of options" provided for students to choose from -- they are six separate high stakes test that students must pass.

If this concept has merit, it will withstand the scrutiny of examination. That comprehensive examination has not yet taken place. The concept has not adequately been vetted.

**We urge the Board of Education to withdraw the proposed GCA's regulation until the implications of the concept can be more thoroughly examined.**