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PA. STATE BOARD
OF EDUCATION

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

July 22, 2009

Dear Dr Buckheit,

I am writing this letter to The State Board of Education on behalf of the Pennsylvania Association of Supervision and curriculum Development (PASCD) to present PASCD's position on the Proposed Keystone Exams Regulation that will come before the Board at its August meeting. The position is attached. You will note that we appreciate the willingness of Mr. Torsella and State Board Staff to listen to our concerns and attempt to develop a compromise with the educational groups in the creation of the proposed final regulations. However, we still have three major concerns outlined in our position statement.

We also have a series of questions regarding the complex administrative, organizational and logistical issues that should be addressed before the regulations are formally approved. A sample of these questions follows. What is the research showing that high stakes testing improves achievement? What are the real costs to districts of teacher training, administrating and scoring the alternative project? What are the costs to districts to develop and implement remedial programs for students who fail the Keystone Exams? What are the costs to districts to implement a statewide curriculum? These costs will include texts and materials, teacher training, etc.. Will students have ready access to retaking a failed Keystone Exam or module of the exam? Will students, especially juniors and seniors, have enough time to complete the remediation and retake the exam or exam module in a timely manner? Can PDE meet the schedule outlined in Section 4.51.f.5? If not, graduation will be delayed for a group of students due to logistical issues. Will the final course grades for transcripts be determined from the Keystone Exam score if the students do not reach basic on the retest process and must complete the bridge projects? Will transcripts reflect a course grade of incomplete until students successfully retake a Keystone Exam or module of the exam they failed or complete a bridge project? It will be difficult to complete the regional scoring of the alternative assessments in a timely manner. How can this scoring be completed for seniors to graduate on time? Why can't the alternative exams be scored locally with protocols provided by PDE? Will districts have the option of setting a local policy regarding students being able to test out of courses by taking the Keystone Exam? How many times may students try to test out of a course by taking the exam? In rural and small districts there are few certified biology, chemistry and math teachers. If the professional staff will not work in the

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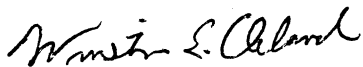
summer how will districts recruit certified teachers to provide remediation in these subject areas? Will there be regularly scheduled invitations to the public to discuss the many administrative and organizational challenges that will arise during the implementation process? Will planning for the implementation be based on research on similar programs?

PASCD has not had the opportunity to review the proposed final regulations. Its members have not been able to seriously analyze the practical issues and ask additional questions about implementing these regulations. The questions our members identify might be helpful in assuring the regulations are successfully implemented.

I am sure that there are many other serious practical questions regarding the implementation of these regulations and I encourage the State Board of Education to give the educational community time to review the regulations and develop a dialogue with the Board and the Department of Education before approving final regulations. Approving complex regulations before they have been carefully reviewed by the people charged with implementing the regulations often result in painful unanticipated consequences.

I am asking that you share this letter with the State Board members.

Sincerely,



Winston E. Cleland
PASCD Policy Analyst

Cc: PASCD Board