

Board of School Directors
200 Hillvue Lane
Pittsburgh, PA 15237-5391
412-369-5437

August 11, 2009

Mr James Buckheit
Executive Director
State Board of Education

Re Proposed Keystone Exam Compromise

Dear Mr Buckheit:

I write to you today on behalf of the North Allegheny School Board and ask that you distribute these comments as well as the enclosed Resolutions to the members of the State Board of Education. North Allegheny is a high performing school district of almost 8,100 students in the northern suburbs of Pittsburgh. Our Board is committed to ensuring that students graduating from our District are competent and able to perform whether they choose higher education, military service or immediate employment in the work force. Several years ago, our Superintendent, Dr. Patricia Green, under the direction of the School Board, developed and implemented early intervention programs at the elementary level, as well as remedial programs at the high school level. The goal of these programs was to assist struggling students so that they could be successful both on the PSSA exams as well as in their future careers. As a result of our efforts, North Allegheny students are among the highest performing in the state of Pennsylvania. I give you this background so that you may understand that we take very seriously the issue of student achievement. We know that when a student graduates from North Allegheny, he/she is fully prepared. We have undertaken all these efforts without the need for GCA/Keystone Exams, or whatever name you choose to give the proposed end-of-course exams. Our approach is not magic and can be undertaken today by any school district in Pennsylvania that is serious about student achievement. There is no legitimate need for GCA/Keystone Exams.

North Allegheny (the Superintendent, the School Board, the staff and community) continues to be opposed to the GCA/Keystone Exams for the following reasons:

- The State Board of Education currently has the authority, the ability and the data to force non-performing school districts to make improvements to curriculum and instruction that would result in improved student outcomes. We currently have the data (via the PSSA results) that tell us which students and districts are struggling. We don't need additional tests to tell us what we already know. What districts do need is some real assistance from PDE in developing instructional strategies, curricular aids and professional development programs that would help teachers help students achieve at a higher level. Instead, we focus entirely on giving students more tests as if more tests will give us a different answer! How ridiculous!

"Great Expectations ... The Best Is Yet To Come!"

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- The latest “compromise” is no compromise at all. Although the details are fairly sketchy at this point, a lot more work has to be done. For example, if we pick out one small component – Algebra 1, I can point to specifics that will make this unwieldy in practice. In my District, students can take Algebra 1 at 6th, 7th, 8th or 9th grade, depending on their math ability. Implementation of a “final exam” for Algebra 1 means we will be administering that test at four different grade levels each year. Additionally, it seems ludicrous to give an 11 year old student a test where 1/3 of his final grade (and potentially his high school graduation) rests on the outcome of the test. And, of course, some of the youngsters scheduled to graduate in 2015 (incoming 7th graders who would be subject to these new requirements) have already taken or will take Algebra 1 before the new “final exam” is even developed. This example does not even address the situation of not passing certain modules and, therefore, not getting credit. The devil is always in the details of any kind of compromise and the details are sorely lacking here.
- The proposal to substitute certain end-of-course Keystone Exams for the current 11th grade PSSA tests simply does not make practical sense. As an example, the Math portion of the current PSSA includes Algebra I, elements of Algebra II and Trigonometry. How can we say we are improving high school rigor if we substitute the proposed Algebra I exam for a current exam that is already more rigorous? That would seem to be a “dumbing down” of standards rather than an improvement of rigor.
- We also have strong reservations about the use of DRC, either to craft or score exams. Their current methodology of hiring temporary workers with minimal training to score PSSA exams is a travesty. The cavalier attitude of some of these workers should make all of us question the validity of the current test results. Unfortunately, we now seem to be willing to base a Pennsylvania student’s readiness to graduate on the results of tests graded by people with no teaching knowledge or experience. Rather than rewarding DRC with an additional contract, the State Board should be conducting a full-blown investigation of exactly how they score tests today and whether we ought to be delegating the responsibility for determining a Pennsylvania student’s future to the temporary and poorly-trained workers hired by DRC.
- The cost of developing and implementing these tests is prohibitive in this type of economic environment. Not only will the cost be borne at the state level, but it is likely to drive up costs for any district that decides to go through the validation process for local assessments. That is simply unsound management of fiscal resources.

Additional tests, whether they are GCA’s or Keystone Exams or anything else, are only a feel-good measure. They allow politicians to claim that progress is being made in educating youngsters when the truth is that progress will only be made when we chip away at the problem, day-by-day and student-by-student.

I urge all of you on the State Board to reject this Keystone Exam proposal. It is not good for Pennsylvania taxpayers or for Pennsylvania students.

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Now, if we were all serious about wanting to make a difference in the competitiveness of Pennsylvania students with their counterparts in Singapore or Japan, we would start discussing lengthening the school year so that our students have the same amount of time to master skills as those students do. Unfortunately, that's probably a conversation for another day and probably not for those politicians who seem interested only in quick sound bites.

Sincerely,

Maureen M. Grosheider
Maureen M. Grosheider, President
North Allegheny School Board

MMG/rmr
Attachments

c: Senator Jane Clare Orie
Representative Mike Turzai
Senate Education Committee Members
House Education Committee Members
Dr. Patricia Green
North Allegheny Board Members

**A RESOLUTION OF THE BOARD OF SCHOOL DIRECTORS
OF THE
NORTH ALLEGHENY SCHOOL DISTRICT
OPPOSING THE PROPOSED KEYSTONE EXAMS**

WHEREAS, the Pennsylvania Department of Education had approved a proposal to revise the current high school graduation requirements under the Chapter 4 regulations to require students to pass a series of standardized high-stakes Graduation Competency Assessments in order to get a diploma; and

WHEREAS, the General Assembly of Pennsylvania placed a one-year moratorium on the State Board prohibiting them from implementing regulations to establish GCAs or proceeding any further with them without the sanction of the General Assembly; and

WHEREAS, the State Board has ignored the one-year moratorium placed on them by the General Assembly under Act 61 of 2008 which prohibits the establishment of high school graduation requirements and issued Request for Proposal for the GCA tests in August 2008, which will now be known as the Keystone Exams. Further, the Department of Education has awarded contracts with Data Recognition Corp. to develop Keystone Exams in spite of the one-year legislatively imposed moratorium.

WHEREAS, the State Board, the Pennsylvania Department of Education, and the Pennsylvania School Boards Association have entered into a joint agreement that would replace the highly-controversial and highly-objectionable GCA proposal with an alternate proposal that is also highly controversial and highly objectionable, known as the Keystone Exams; and

WHEREAS, there is a broad requirement for local assessments to be aligned with the state academic standards and include performance-level expectations to be comparable to the PSSA or Keystone Exams; and

WHEREAS, the Keystone Exams' proposal permits schools to use a local assessment option; these local assessments must be validated in order to be used. The proposal states that "PDE will establish a Local Assessment Validation Committee to develop criteria for the validation process and criteria for the selection of approved validation entities The committee's criteria for the validation process and criteria for selection of validation entities will be submitted to the State Board of Education for approval or disapproval." The cost of validation is to be evenly divided between the District and the State Board; and

WHEREAS, the costs associated with validation will be an additional burden to school districts and taxpayers across this state, and the proposal requires school districts to absorb many new costs related to revising curriculum, professional development, test preparation and administration, remediation and other costs; and

WHEREAS, the cost for the development and implementation of these exams approximates \$210,000,000 over the next seven years, and, in light of the current economic situation in this Commonwealth and the nation, the Governor, the State Board, the Department of Education, and the Pennsylvania School Boards Association should not be adding additional expenses to district and taxpayer budgets, and, with the limitations of Act 1 on tax increases, school districts have limited ability to fund any potential new costs; and

WHEREAS, the State Board has already sent out the preliminary revisions to the current Chapter 4 regulations in regard to the Keystone Exams; these new regulations leave many unanswered questions and much ambiguity; and

THEREFORE, BE IT RESOLVED that the Board of Directors of the North Allegheny School District opposes the joint proposal between the State Board, the Pennsylvania Department of Education, and the Pennsylvania School Boards Association to enact the Keystone Exams. With the additional validation costs to school districts and taxpayers, school districts will implement and use the Keystone Exams thereby making the Keystone Exams mandatory, as school districts may find that they have no alternative but to choose the Keystone Exams due to cost and complications related to the validation process; and

WHEREAS, the Board of Directors of the North Allegheny School District will hereby continue to support legislation to extend the moratorium as well as any legislation against any new test development or implementation and funding being used for this purpose; and

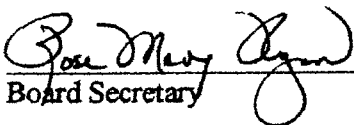
WHEREAS, this resolution will be shared with the State Board of Education, the Department of Education, the Pennsylvania School Boards Association, state legislators, including local legislators and members of the Senate and House Education Committees, and any others as this board directs; and

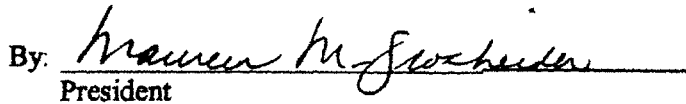
FINALLY, BE IT RESOLVED that the Board of School Directors of the North Allegheny School District hereby directs the Superintendent and Board President to communicate this resolution to other school districts within the Commonwealth of Pennsylvania and to members of our community, encouraging other school boards and individuals to take similar action on this issue.

ADOPTED this 27 day of May, 2009.

ATTEST:

NORTH ALLEGHENY SCHOOL DISTRICT


Board Secretary

By: 
President