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SERVICES, RESOURCES, AND RESEARCH FOR EDUCATION

August 10, 2009

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

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INDEPENDENT PROHIBITORY
EDUCATION

Dear Mr. Buckheit:

As the Superintendent of South Fayette Schools for 13 years, high school principal for 6 years and now serving as the Executive Director of the Allegheny Intermediate Unit, I have had the opportunity to view many “good intents” to improve our public education system in Pennsylvania. I must try to believe that those who have crafted the proposed revisions to Chapter 4 have done so with “good intent” for when you are not involved in the day to day operation of a school system, you may indeed believe that proficiency on a test or series of tests is a “fix” or “cure” to those students who may be graduating without the necessary skills for success beyond high school or to a “system” that is flawed. I contend that what is proposed is not only “NOT A CURE OR FIX” but will exasperate a flawed system and rather than create further accountability, will create further inequities for children.

One must assume when reading the revised regulations that there is a direct correlation between the score on a standardized test and “success” in one’s future. In addition, the conclusion that also would be made is that if “proficiency on the test” is demanded and is a requirement for graduation, then this in turn will motivate those students to put forth more effort to do better on the test, or alternative assessment, and then miraculously, they will be “smarter” and in turn their diploma will be more meaningful and they will be successful.

Perhaps you and others might remember cramming for tests, memorizing or even synthesizing information in preparation for the “big exam,” only to forget it a week or so later. Was there merit in doing this? I would suggest that the “merit” was to pass the exam, but little if any true learning took place. Visit even the very best schools prior to PSSAs and observe what is occurring in the classrooms – practicing sample tests!

Through my past written correspondence to Senator Piccola and my remarks at Senator Orie’s press conference, which I have attached, I have presented many of my philosophical views, supported by research. I also have attempted to clarify what is most important, and that is, the effect that these regulations have on children. I also am compelled to ask whether or not those responsible, can with a clear conscience make this decision knowing that there is no evidence that shows that such a series of tests required for graduation will benefit children or cure the problems that exist within the educational system.

Linda B. Hippert, Ed.D., Executive Director

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Rather than reiterate, that which is documented in the previous information, this correspondence will serve as the “practical aspect” of the concerns I have relative to the proposed regulations. The items below in *italics* are taken directly from the proposed regulations. My specific concerns are identified below the *italicized* verbiage in **red**.

1. *Keystone exams will be scored on a 100 point scale. When used to determine proficiency to meet high school graduation requirements they shall count for one-third of the final course grade. Students must score advanced, proficient or basic on a Keystone Exam to receive points from the exam towards their final course grade.*

These regulations are now interfering with a student’s Quality Point Average, a number derived in various manners throughout the Commonwealth (some have weighted scales, some unweighted; some districts utilize letter grades, some percentages; some districts use a scale of 100-90 A; 89-80 B; 79-70 C; 69-60 D; below 60, F, others use 100-93 A; 92-85 B; 84-75 C; 74-65 D; below 64, F, in addition to many variations of these.) Was this taken into consideration when the decision was made to count this “GRADE” as 1/3 of the student’s grade in a course?

In addition, the large majority of schools utilize four grading periods. The scenarios below show the effects of applying this methodology, and the final grades using the two scales identified above.

Wt. of grade Grade Period	0.1666 1st Q	0.1666 2nd Q	0.1666 3rd Q	0.1667 4th Q	0.3333 Exam	%	Scale A	Scale B
							Final Grade	Final Grade
							A	B
Scenario A	100	100	100	100	0	66.67	D	D
Scenario B	100	90	90	90	0	61.67	F	D
Scenario C	89	89	88	87	0	58.8364	F	F
Scenario D	75	75	75	73	60	69.6673	D	D
Scenario E	90	80	80	80	61	75.3343	C	C
Scenario F	95	95	92	91	70	85.501	B	B
Scenario G	55	52	59	59	100	70.8316	D	C
Scenario H	57	58	59	57	80	65.166	D	D
Scenario I	90	88	90	90	0	59.6696	F	F
Scenario J	59	59	59	59	78	65.3327	D	D
Scenario K	73	72	77	73	0	49.1692	F	F
Scenario L	78	79	77	76	0	51.6694	F	F
Scenario	81	82	80	78	0	53.5029	F	F
Scenario N	81	83	80	82	60	74.334	D	C
Scenario O	84	86	83	81	70	79.0007	C	C
	Scale A	100-93 A	92-85 B	84-75 C	74-65 D	Below 65 F		
	Scale B	100-90 A	89-80 B	79-70 C	69-60 D	Below 60 F		

The decision to affect a student's Quality Point Average by a weight of .3333, greater than any nine week period and equivalent to the weight of the grade earned for one full semester (.1666 + .1666 = .3332) provides an illusion that being able to score well on the test is a very significant measure of what the student knows as is able to do. Can this be validated? What ramifications will this have for the child who fails to attain a college scholarship due to the effect that this test has had on his/her QPA or his inability to gain entrance to a post secondary institution? And in reverse, can it be validated that this child's grade correlates to student achievement or his/her ability to "pass the test?"

Scenarios C and I above demonstrate that the student performed at an "A-B" level throughout four nine weeks of study, but failed to score at the required level of the final exam. The student's recorded "0," results in him/her failing the course using either grading scale.

Scenario H on the other hand, demonstrates that a student who performed at the "F" level throughout the four nine weeks of study, but scored at an acceptable level on the exam will in turn pass the course.

This system is flawed and I do not believe in any way reflects the intent of these regulations.

Additionally, it is important to recognize that in this process, a student enrolled in HONORS BIOLOGY will take the same FINAL EXAM as the student enrolled in BIOLOGY and BOTH will account for one-third of the student's final report card grade, which ultimately reflects his/her quality point average.

- 2. Advanced Placement or International *Baccalaureate* (NOTE: this is copied from the regulations and is spelled incorrectly. The correct spelling is *Baccalaureate*) exams that include academic content comparable to the appropriate Keystone Exam at a score established by the Secretary to be comparable to the proficient level on the appropriate Keystone Exam. Successful completion of an Advanced Placement course and test may be used for one or more of the courses required for graduation without the student being required to take the related Keystone Exam.**

Advanced Placement and International Baccalaureate exams are given in May of each year. The days and dates are predetermined by their respective Boards. Results for the exams are issued in July. Advanced Placement and International Baccalaureate exams are typically taken by junior and senior students. High schools determine student failures, summer school requirements, etc. before this time. Graduation occurs prior to June 30th and scores are not even realized at that time. Advanced Placement exams are scored as a 0, 1, 2, 3, 4, or 5. How is this converted FAIRLY to a percentage score to be utilized as 1/3 or a grade for determining a student's final grade in a course? The content of an Advanced Placement course is driven solely by the curriculum audited by the AP Board and not necessarily the PA Standards. Although the concept of utilizing such an exam may sound positive; logistically, this language contains many flaws.

3. *The Department shall establish a list of entities approved to perform independent validations of local assessments in consultation with the local assessment validation committee. The Department shall establish a local assessment validation committee composed of up to two representatives each from the Department and Board and four representatives from the Pennsylvania School Boards Association. . . .The Committee shall develop the criteria for the local validation process and . . .*

I would suggest that any committee that will be charged with “developing criteria for the local validation process” should specifically include those with credentials associated with assessment.

4. *If one or more Keystone Exams are offered as graduation requirements, they shall be offered at least 3 times each year: once each in the fall, spring and summer. Keystone exams shall be administered reviewed and scored so that the scores for candidates for graduation are provided to schools no later than 10 calendar days prior to graduation.*

The intent to provide options for testing may indeed appear worthy; however, the logistics of “offering testing” for ten exams at least three times a year, and each exam to a student at least two times, accompanied by the student’s opportunity to take “portions (modules)” of each of the exams and then in addition oversee project-based assessments for **each** of the modules associated with **each** of the ten exams presents a scenario to an administrator that is quite laborious and onerous. Few schools, if any, are currently equipped with personnel who would be able to take on this added assignment. And, in times of budget constraints, this clearly adds additional financial burdens to the Districts, without any proven benefit for children.

5. *The Department shall seek to have the Keystone Exam System approved as the high school level single accountability system under the No Child Left Behind Act of 2001 . . .*

Eliminating the PSSA tests and utilizing an end of course exam for accountability of No Child Left Behind has merit. It should be noted however, that until approval is received, students will be taking the PSSA tests along with the Keystone Exams. In 2010 spring testing, eleventh grade students will spend nearly three weeks in April engaged in exams in Reading, Writing, Mathematics and Science. For those enrolled in AP courses, they will continue exams for a fourth week in May. And, because all students will be required to be proficient in at least six exams, the exams will need to be administered in all ten courses, thus students would actually be taking ten exams. And until such time as the PSSAs would be discontinued, the students at the high school level would also take the four exams in Reading, Writing, Mathematics and Science.

6. *Validity Study of Keystone Exams - . . . these studies shall determine, at a minimum, the degree to which the Keystone Exams and performance cut scores are valid for the purposes for which they are used; aligned with stated academic standards; aligned with performance levels of other states; are internationally benchmarked and predict college and career success.*

The above regulations as stated above are said to ensure “validity as a predictor of college and career success.” Has the State Board been provided with valid research based upon longitudinal data whereby these subject specific exit exams have proven to be indicators of college and career success? I would suggest that it would be important to view that research, if it exists, prior to including such “fact” in regulations.

7. *If a student is unable to meet the requirements in subsection (B)(IV)(A), a student may supplement **their** (NOTE: SHOULD BE HIS/HER) Keystone exam score through satisfactory performance on one or more project modules related to the Keystone Exam module or modules in which the student scored below proficient. Points earned through satisfactory completion of one or more projects will be added to a student’s highest Keystone Exam score. The total shall count as one-third of a student’s final course grade, as provided in (f)(8).*

Those who are trained in the field of assessment would suggest that “adding points” to a student’s exam grade via scores received on individual modules would tarnish the overall “score” received for the exam. Also, it is crucial to remember that this “exam” as proposed DOES AFFECT a student’s QPA, which in turn affects his/her class rank, etc. Student’s who earn points by individual modules could in turn receive a significantly higher SCORE on their exam due to the fact that they are being assessed on a limited amount of information per module. This however as proposed is not weighted any differently than the student who took the exam as one single test. Since high school QPA does affect class standing, completion for admission to college, etc., does this option create unfair advantages and inequity? Can a student who wants to earn a “BETTER SCORE” to help his/her grade, and in turn improve his/her class standing re-take parts of the test in modules or is this only reserved for those who were below basic? What unintended consequences would this have?

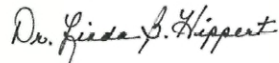
8. **Project-Based Assessment.** The Department shall develop a project-based assessment system which is aligned with the modules for each of the ten Keystone Exams. The project-based assessment system shall be administered by schools and scored by regional panels composed of teachers, principals, and curriculum specialists assembled by the department. The regional review panels shall score student projects according to scoring protocols and rubrics developed by the department.

This “final layer” of assessments and final opportunity for a child to be deemed proficient creates yet another well intended, but arduous method for accountability. Will the student actually create a “project” under the supervision of an educator, in his/her presence? Will students choose to utilize this method for proficiency if they believe they can attain the “best score” in this manner which ultimately affects their course grade by 33 1/3% and their final grade which influences their QPA? How indeed will yet this other opportunity be managed and grades communicated to the school districts for recording and calculation?

As the State Board of Education carefully reviews the proposed regulations, my comments and those of many others, I sincerely hope that they will realize that moving forward would not be responsible and indeed would create havoc on our educational system which already experiences challenges. I urge the legislators and the State Board to ADDRESS THE REAL ISSUES in our failing schools (remembering, that many are doing quite well) – the need for a rigorous, relevant curriculum aligned with standards, the need for quality professional development for teachers and administrators, and the need for quality instruction in our classrooms. This should be demanded from every school district in our Commonwealth and ALL OF US should be held accountable for this level of excellence. The children DESERVE IT! But the children do not deserve to be penalized for a system that is flawed. We, as the adults and the professional educators, must first be committed to put in place an excellent system that serves ALL CHILDREN well. And only then should we hold the children accountable for high levels of demonstrated achievement in that system.

In advance, I thank you and the members of the State Board (please share this with all of them) for considering my comments. Please know that I am always quite willing to discuss my thoughts with any of you and I would sincerely welcome the opportunity to be part of the solution for improving our Commonwealth's schools. I may be reached at 412.394.5705 (office), 412.389.6631 (mobile), or linda.hippert@aiu3.net.

Sincerely,

A handwritten signature in cursive script that reads "Dr. Linda B. Hippert".

Dr. Linda B. Hippert