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From: Mars R&R Services [marsrrservices@zoominternet.net]
Sent: Tuesday, August 18, 2009 8:01 AM
To: IRRC
Subject: Submitting Comments to IRRC on Chapter 4
Attachments: Torsella Compromise Analysis & Notes 7-11-09.doc; State Board of Education, August 12th, 2009.doc; States to See Change by Kim Geyer.doc; Pennsylvania Senate Education Testimony for February 19th, 2009.doc; Mars Resolution Opposing Keystone Exam 1.0 Proposal.doc

Dear IRRC,

Good morning! I am submitting comments toward your deliberation of Chapter 4 regulations.

Thank you for your consideration.

Sincerely,

Kim Geyer
Mars Research & Retrieval Services
451 Denny Road
Valencia, PA 16059
724-799-1195

Mars Area School Board President
Midwestern Intermediate Unit 4 Board Member & Legislative Liason

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The Torsella Compromise: An Analysis by Mars Research & Retrieval Services
July 11, 2009

Compiled by Kim Geyer, www.marsrrservices.com

The July 9th Torsella plan is contingent upon the approval of the USDOE to eliminate the 11th grade PSSA in lieu of three Keystone Exams (Algebra I, Literature, and Biology) which would then become mandatory exams.

There will be a total of ten exams phased in until 2016. There will be three federally required exams (Algebra I, Literature, and Science) and one state required exam (writing) phased in for 2010. While the Torsella Compromise indicates students will have to pass six of ten exams, technically, students will be required to pass all ten as 30% of a student's grade point average is going to be based on the exams. Each exam contains anywhere from 5-7 modules per core subject tested. All modules will have to be passed by students per subject.

The Keystone Exam process under the Torsella plan will entail the following:

Test Preparation, Testing, Remediation, Retake of Test, Remediation, and then Project Based Assessment. This process will be labor intensive and these costs will be borne at the local level by school districts and intermediate units who will assume responsibility for the facilitation of the alternate pathways and the Project Based Assessment component of the Torsella Plan. These costs are unknown and will be discussed at a later point in this analysis.

Comments Come To Mind:

- A. What if that approval by the USDOE to eliminate the PSSA doesn't materialize? The proposal's language states "Upon Such Approval"...
- B. Does the PDE have a clear understanding of the process and timeline by which the Federal Department of Education would give their approval for using the new exams in place of the PSSA?

It is very well possible; that the Commonwealth may be required to field test/pilot the Keystone Exams for several years to provide longitudinal data for the USDOE to determine it to be a valid and reliable assessment for AYP accountability under NCLB. Such as was the case, when we first implemented the PSSA in 1999 after the Outcomes Based Education Era. We needed several years of longitudinal data consistently, before the PSSA could be recognized as a valid and reliable state assessment prior to 2001's NCLB.

So, in reality, we could have at least 2-3 years of students taking both the PSSA and Keystone Exams simultaneously until there is a transition made. Keep in mind, that also we will be having a transition within two years for a new state Governor and Administration which could result in more change and/or a new direction.

- C. The question needs to be asked as per how a student is supposed to take an Algebra 1 exam in the 11th grade when they had the course in 7th grade among others....which leads one to think, the plan is to make all grade levels have end of course exams and in lieu of eliminating, phase-out the local assessment option due to lack of affordability and/or commitment by the State's 50/50 provision and language which allows a loophole for the State to not fully commit to funding the local assessment. According to Chairman Torsella, students will take the Algebra I exam in 9th grade.**
- D. The PSSA is given in all grades 3-8. So, this scenario, if the PSSA were to be eliminated, the PSSA's would still be administered in all lower grade levels 3-8 and then in 11th grade administer three mandatory Keystone Exams. Why do PSSA tests up until 11th grade and then throw three different tests into the mix? Why not keep the assessments uniformed and consistent in all grade levels? Or is this the plan without being totally transparent about it?**
- E. Has the PDE come up with a plan to address future litigation made by districts and/or students who could possibly file suit against the State who may have been making annual progress of achieving AYP and then due to the transition of new tests and lack of test preparation for students, and/or lack of staff's professional development for instruction, and/or due to inconsistent curriculum alignment, see their test scores decline or plummet? What measures have you put into place? Has anyone thought of these potential scenarios with so much emphasis placed on meeting AYP for accountability purposes under NCLB especially with 2014 drawing so near? Districts have different cohorts of students...this transition will affect all student sub groupings.**

If we look at the proposal we'll see that the language addressing the elimination of the 11th grade PSSA is a new item. The PDE is going to seek to have the Keystone Exams approved as the high school level single accountability system under the ESEA Act. So, its very well possible you could have a student who took Algebra 1 in 7th or 8th grade not take the Algebra 1 KE until 11th grade if they don't test out earlier in 9th or 10th grades. If the Keystone Exams are to take the place of the PSSA for the purpose of determining AYP, are not our 11th graders still required to be

assessed under NCLB? For those who test in 9th grade or test out, would their scores still count?

The Graduation Requirements are retained items, with the exception of the new language which reads: (under item i)

“Keystone exams will be scored on a 100 point scale and count for one-third of the final course grade. They may be counted for more than one third of the final course grade at the sole election of the district. Students who score below basic on a Keystone Exam will not receive any points from the exam towards a final course grade (with zero as 1/3 of the student’s grade.”

Grading Provision Under the Torsella Compromise:

Under the Torsella Compromise, the exam counts for 1/3 the grade. This language is an attempt by the State Board of Education to have students take the test seriously. THE EXAM IS SUBJECT TO A “FLOOR.” What this means is that in each subject (which may have 5, 6, or 7 modules of tests per subject), if a student does not reach a passing “cut score” *on a composite of all* of the modules, he is given a 0% for 1/3 of his grade. Cut scores have not been determined yet – there is a committee which will determine the cut scores. This equates to a 66%, which could be a failing grade for the course (100+100+0/3). Therefore, a student who may score at 100% on all areas of class work, may fail the course unless he/she goes through the additional process of remediation, re-take of the failed module, further remediation if necessary after failing, and then a Bridge Project done at the local level on the modules for which they scored below basic. The Bridge Projects will be regionally scored.

Conversely, a bright student who chooses to do “failing” classroom work, earning for example an average of 60% for his class work, projects, compositions, and class tests, but who aces the Keystone Exams earns (60+60+100/3) an average of 73% for the course, a passing grade. The implications of this process will be massive for students and school districts. Students who are NOT good test takers will lower their grade point averages and have a more difficult time getting accepted into colleges.

So, we need to ask: Is the requirement that you pass the test, or get a passing grade in the course? Currently, most of our schools use end of course exams, but, rarely do they count for so much. The “1/3 provision” of the Torsella Compromise is the State Board of Education’s attempt to have students take the test seriously.

The plan may appear to make the process of a student’s efforts for course work and seat time seem pointless unless it would be determined that ANY score of the Keystone Exams would be be factored into other graded work to determine proficiency and passing? Policymakers need to determine what is the actual impact of the 33% proposal? How would it be implemented? There are many issues and concerns by many of the education stakeholders on this particular provision.

Page two of the proposal addressing items (ii) as per locally approved assessments is retained language from Keystone Exam 1.0. As is item iii, which addresses a variety of acceptable assessments such as AP and IB Exams may be used for ONE of the courses required for graduation without the student being required to take the Keystone Exam.

The PDE will argue that due to the new language pertaining to the “Alternative Pathways” that failure of a Keystone Exam would not prohibit a student from passing a course or from graduating. The provision addressing students who fail the course and/or test and retaken one or more modules, can participate in a project based assessment requiring various modules. (Maryland’s Bridge Plan for Academic Validation). This is Maryland’s first year of implementation of the Bridge Plan and they have between 8,000 and 10,000 students who are partaking in the Bridge Project this 2009 year.

The Waiver Language which addresses case by case special circumstances which may require waivers is new language and a new provision which did not exist with Keystone Exam 1.0. These decisions are currently made by local school boards by those closest to the students. Now this power and authority will be shifted to the state. This language erodes local control of school boards.

The “Alternate Measure of Proficiency” can be demonstrated by an IEP student as long as an alternative is described in a student’s IEP. This is new language which did not exist in Keystone Exam 1.0. While these provisions for students with IEPs is a positive development, however, what will be of the effect on special education budgets once there is a general recognition that an IEP label can mitigate a student not earning a diploma? Students who struggle but may not have the IEP will suffer the most under this plan and will be facing a great deal of testing and frustration.

The provision on page three, “Testing Out” is a new provision which did not exist in Keystone Exam 1.0. Local school boards at their discretion may allow students who score at the advanced level on a particular Keystone Exam prior to taking the course to be granted course credit for that subject as well as an exemption from taking the course. Again, seat time involves a process of valuable learning and experience in lieu of just testing. There is social interaction and loss of learning various perspectives when students simply utilize the pathway to “test out”.

“Validity of assessments”

- 1. Local Assessment Validation Advisory Committee is a retained item from the Keystone Exam 1.0 with the only change addressing the expansion of members from 8-12. There will be no teachers, principals, or superintendents**

on this committee “unless they are appointed by the other representatives” in one of the four extra board positions by the others.

2. **State Assessment Validation Advisory Committee** is a new provision which give the PDE the authority to establish a new committee that will establish criteria for the validation of the Keystone Exams themselves. Again, there will be no principals or superintendents on this committee unless they are appointed in one of the four extra board positions by the others. The Keystone 1.0 proposal did not make provision for “validating” the Keystone exams due to concerns over the expense of validating those exams. Policymakers need to consider this when evaluating the practicality of a school district’s ability to “validate” their local assessments which as of this date, are yet to be determined at the local level, along with test administration, and record keeping. The State has no problem making districts incur the costs of validation of local assessments, even when they had initial concerns of validating the Keystone Exams themselves.
3. **Validity Study:** New language and new provision which will enable the PDE to contract out every five years to an “independent research organization” to perform validity studies of the Keystone Exams and performance levels of the cut scores. Costs yet to be determined. There is no language specifying third party and/or truly an independent contractor. This language is vague and could be similar to a situation as when the Penn state Study validated district’s local assessments.
4. **Local Assessment Validation Cost:** While we are all aware that local assessment validation cost was provided in the first Keystone 1.0 plan. The new proposal incorporates some distinguished language such as “**Subject to appropriations provided by law the cost to validate the local assessments shall be evenly divided...**” The language in bold listed above cannot be put into law, despite the SBOE’s attempt to do so. We can wait and see how the IRRC will proceed with that matter. ***PLEASE NOTE THERE IS NO PROMISE, OBLIGATION, OR COMMITMENT AFTER THE STARTGEIC PLAN IS EXPIRED ON THE STATE BOARD OF EDUCATION’S PART REGARDLESS OF ANY AND/OR ALL ALLOCATIONS.***

More new language: “Should the Department not provide sufficient funding to cover its share, local assessments submitted for validation shall be deemed valid for the balance of the strategic plan....” In other words, if the state doesn’t fund 50% of the cost of validating the local assessments, the local assessments are deemed to be “valid” until their next strategic plan cycle or mid-point review. Technically, there is no incentive for the State to come up with their share of the 50/50 commitment.

My comment: What's to prevent the PDE/State from not funding the validation of the local assessment EVER?.....only to allow them to expire with the turnover of the cyclic strategic plans one by one?.....only to then be forced to not have the option at all....in not having a local assessment and be forced to do the mandatory Keystone Exams? Under this language, the potential for this scenario would exist. Six years from now, when the entire phase in of the Keystone Exams is completely developed and implemented, there would likely be no local assessments. This process would gradually phase out the local assessment and would coincide with the completion of the phase in of Keystone Exams by 2016.

Furthermore, even if the legislature would not appropriate funding for the validation of the local assessments for any reason in a particular budget year, the possibility would exist for districts to either not be able to afford the high costs of validation of local assessments themselves, or the State/PDE could NOT pay their share, let the local assessment run its course when it meets the strategic plan deadline, and then be forced do what the State wanted them to do all along.

Performance level descriptors and performance level cut scores will be determined by a new committee. This is new language and was not contained in the Keystone 1.0 plan. What I find peculiar with this language is not the intent, but, that the fact we have special interest groups identified in regulatory language....specifically, US. Armed Forces and employers. These two groups will be subjective participants and there is no baseline criteria or national consensus by either of these two groups on what students should know and when, let alone expectations established. Furthermore, I find it even more peculiar in that our Governor accessed these two special interest groups to advance his agenda in pushing these tests across the goal line. We should have EDUCATORS determining cut scores. Pennsylvania will be the first state in the country to pilot and subject the cut scores to the best forms available in the three areas of content, criterion, and consequential validation, so in essence Pennsylvania is “clinically testing our students” and plans to utilize the process as an federal AYP indicator.

Technically, there will be three committees under the Torsella Plan:

- 1. Local Validation Committee to validate local assessments.**
- 2. State Assessment Validation Committee to validate the KEs themselves.**
- 3. Committee to determine the performance level descriptors and performance level cut scores.**

Phased development of Keystone Exams: This is new language addressing the phasing in of end of course exams in several ways. Remember, the PDE is

indicating they will develop these tests for VOLUNTARY use and when and if approved by USDOE for Adequate Yearly Progress, they will become mandatory. But, basically, we can be assured these tests will be mandatory as Pennsylvania's history is everything that is voluntary becomes mandatory. Schools will be required to have curriculum aligned with assessments if it is a part of a student's grade, determined by national court rulings. If districts have a combination of tests, districts will have to have a combination of curriculum....districts will find this scenario to be unaffordable and thus the result will force districts to embrace the state Keystone Exams. So, the process and rhetoric leads one to initially believe things are voluntary...but, they're leading you into a box that is mandatory. See how this works?

If these tests are truly voluntary, then Chapter 4 regulations are not necessary until the point they become acceptable measures under NCLB for AYP. If PDE wants to develop tests, then why he need to promulgate regulations at this point unless the purpose is to make them mandatory regardless whether or not they become approved for AYP? There is no need to move forward with regulatory language at this point if they do not become mandatory until approved by the Federal USDOE.

Costs Not Considered Under the Torsella Compromise:

Maryland's Bridge Plan for Academic Validation is approximately one year old as it was initially implemented in May 2008. There is no history of evidence proving it is an effective education reform. This reform is time-consuming, labor-intensive, and costly to local school districts who will bear the costs of the project based assessments. Montgomery school officials in Prince George's County estimated the Bridge Project for their school district alone would cost at least \$1.5 million for its inaugural year. (May 2008- May2009) The additional costs come as school systems face tightening budgets.

Despite the PDE's efforts to shave \$40 million from the original Keystone 1.0 Plan, \$25 million in contract adjustments, and a potential \$15 million in the event the PSSA is eliminated, there are two additional costs to contend with, one which did and one which did not exist in the original Keystone Exam 1.0 plan.

Both of these costs are yet to be determined. ...Both of these costs ARE NOT FACTORED INTO THE \$201 MILLION CONTRACT WITH DATA RECOGNITION CORPORATION.

Cost #1: Validation of Local Assessment (State's 50/50 Share) Language as contained in the original Keystone 1.0 Plan.

Cost #2: Validation of the Keystone Exams themselves. (New Language as contained in the Torsella Compromise and NOT contained in the original Keystone 1.0 Plan. It must

be noted to the reader that the original Keystone Exam 1.0 plan NEVER INCLUDED a cost in validating themselves as it was determined to be TOO EXPENSIVE! However, the PDE was and is going to make the local school districts pay for their selves to have their own local assessments validated in both the Keystone 1.0 plan and the Torsella Compromise.

Costs Not Considered Under Torsella Compromise (Continued)

- Alternative Pathways: Regional Scoring is very lucrative and controversial. The project based assessments will be administered locally, but, scored regionally. In Virginia, estimates are \$500,000 for 5 days of Regional Scoring alone. The Torsella Compromise does not address this, nor the increase of funding which will be needed.
- Testing Out: Addition of Classrooms and Teaching staff
- Combination of GCA and Local Assessment: Tests and Curriculum (As determined in a Florida Court Ruling, schools are required to have curriculum aligned with assessments if it is part of a student’s grade. If schools are using the Keystone Exam(s), they are required to have the supporting content curriculum. If schools are utilizing a combination of Keystone Exams and Local Assessments, they must have a combination of curriculum.)
- Students denied high school diploma: Returning and Drop Out Students.
- Local Costs associated with transitioning to the State Model Curriculum, professional development and new textbooks, materials, and resources.
- State Costs associated with development, marketing, and field piloting State Model Curriculum.

Torsella Compromise: Cost Breakdown (6 year period)

Original Cost of the PSSA	\$150,908,972
Savings available from PSSA Phase Out	\$15,000,000
Proposed Cost of Keystone Exam (Tests Only)	\$126,194,829
Savings from replacing PSSA	\$24,744,143
 Total Savings/Funds Available	 \$39,744,143
*PSSA line item funding to be shifted into Keystone Exam/GCA	

Total Contract Cost Breakdown (6 year period)

Total Contract Cost	\$201,100,000
 Shifted PSSA Funding	 \$39,744,143 (This money will not be a reduction but will be shifted into Keystone Exam development.)
Remaining Funds	\$161,355,857

While the Torsella plan provides provisions for a model state curriculum which will be embraced by some local school districts, the majority of school districts aim to provide differentiated learning and instruction for students by meeting their individual needs based on a variety of course offerings. A model state uniformed curriculum is a one size fits all, which defies differentiated learning styles for students determined at the local level. This shift is a loss of local control and a surrender of graduation requirements not just for school boards, but, the General Assembly is surrendering their control and vested authority over to an unelected State Board of Education as well.

The fact remains that there is no data demonstrating that passing exit exams or end of course exams provides any subsequent benefit in college or career success. There is no distinctive research or empirical evidence to suggest that other states that have these exams in place have outstanding and/or distinctive results to prove this reform has legitimate merit. If there was one, we'd all be doing it and emulating them.

**Kim Geyer
Mars Area School Board President
Mars Research & Retrieval Services
451 Denny Road
Valencia, PA 16059
724-799-1195
July 11, 2009**

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Comments to the State Board of Education about Final Form Regulations Pertaining to Keystone Exams

By Kimberly D. Geyer of Mars Research & Retrieval Services

www.marsrrservices.com August 12th, 2009

This week, state leaders working through the National Governors Association and Council of Chief State School Officers are preparing to publicly release a set of "common core standards" for math and English language arts. By December 2009, grade by grade standards should be made available.

Although state adoption of these standards is voluntary, the goal of the Common Core State Standards Initiative is to **replace** the patchwork of standards among the states with a single set of universally accepted benchmarks on student learning also known as national standards which will be utilized for international benchmarking purposes to compare one country against another in educational gains as mirrored in the December 19th, 2008 report of the National Governors Association. The push for national standards will not make itself felt this year, however, states are expected to begin adopting the new national standards in the early months of 2010. Once adoption begins, local school districts within states will be forced to revise their curricula, textbooks, professional development programs and many other infrastructure changes which will demand a comprehensive systemic reform to the existing education system.

At a June 15th education symposium in Cary, North Carolina, U.S. Secretary Arne Duncan addressed education leaders and the National Governors Association in which he announced that the USDOE will commit up to \$350 million of the \$4.35 billion available for the RTT competitive grants to support states in the creation of rigorous assessments linked to internationally benchmarked common standards developed by states (national standards). Secretary Duncan went on to indicate any tests developed for the new national standards would likely replace existing state assessments and exams. When asked to explain the money's focus on developing more tests, Duncan said "developing the new standards themselves would be relatively inexpensive. Developing new assessments, by contrast, is a very heavy lift financially." He went on to say "Having real high standards is important, but behind that, I think in this country we have too many bad tests." Duncan said "If we're going to have world-class international standards, we need to have world-class evaluations behind them."

Unlike Pennsylvania, the state of Kentucky is up to the challenge and has positioned itself ahead of most other states to resume some of the leadership it had at one time by having the legislature pass a bill this year known as Senate Bill 1 which scraps the Commonwealth Accountability Testing System known as CATS and requires the Dept. of Education to devise new educational standards which can be internationally benchmarked and a new test for the 2011-12 school year. In addition, The Gates Foundation awarded Kentucky a \$250,000 grant to hire a consultant to help prepare the state's application for the "Race To The Top Money". Kentucky's goal is to receive as much as \$200 million for the development of a new assessment system to reflect the international benchmarking and common core standards also known as national standards.

Pennsylvania is the only state without an approved State Fiscal Stabilization Fund application. For Phase One applications of the State Fiscal Stabilization Fund, the USDOE has received applications from every state and have approved 42 states and obligated over \$30 billion, except in the case of Pennsylvania. In order for a state to be eligible for the Race To The Top Phase One competition, the State's applications for funding under the Phase One and Phase Two of the State Fiscal Stabilization program must be approved by the USDOE by December 31, 2009. March 2010 is when Phase One grants will be awarded to states.

The RTT state reform conditions criteria requires applicant states who are participating in the consortium of (46) states working toward jointly developing the common core standards, to ADOPT BY JUNE 2010, " a common set of K-12 standards that are internationally benchmarked and that build toward college and career readiness by the time of high school graduation".

Phase Two RTT applications must detail and demonstrate a commitment toward enhancing a state's quality of assessments "by participating in a consortium of states" (Common State Standards Initiative aka National Standards) and "having high-quality assessments aligned with the consortium's common set of K-12 standards that are internationally benchmarked.. "

Keystone Exams/Graduation Competency Assessments/End of Course Exams are based on the state academic standards as are Pennsylvania's curriculum and local and state assessments. The notion that Pennsylvania's current Administration may suggest that the proposed Keystone Exams as referenced in the recent Torsella Compromise Plan can simply be adapted to national standards, as well as the state model curriculum currently being developed under the PDE's guidance, is inaccurate and misleading.

The Keystone Exams/Torsella Compromise Plan **do not support the nation's movement toward a coherent system of standards, assessments, curriculum, instruction, and educator development as specified by the USDOE.**

The Keystone Exams/Torsella Compromise Plan **does not support the state in moving toward common standards and assessments that are vertically aligned, internationally benchmarked, and college and career ready as intended by the federal administration.**

Approximately forty state's had their Secretary of Education attend a national conference in mid- April 2009 in Chicago, inclusive of Pennsylvania to publicly announce the "Common Core States Initiative" which was the consortium to jointly develop new national academic standards and new national assessments to utilize for international benchmarking. Many states joined on in the month of April and Pennsylvania joined in June. Despite having this knowledge, Pennsylvania's Administration proceeded forth in signing a \$201 million contract with DRC for development of the Keystone Exams on May 13th, 2009 despite statewide opposition and despite knowing the federal education agenda would supersede the state's own agenda.

And, so we find ourselves here today, in this room, literally with the each of you facing the brink of making a very serious and deliberate decision which is going to affect generations of many diverse students throughout Pennsylvania. Your decision on adopting these final form regulations is going to ultimately determine who goes onto college and those students who do not, similar to the gold and silver state seals issue back in 2003. You have a heavy burden placed upon your hearts and minds, while being pressured to vote to support adoption of the newest final form Chapter 4 education regulations. Despite several years of changing political spin related to this issue, all the statewide opposition, the lack of legislative buy in, avoidance of research, evidence based data through months of testimony, circumvention of moratoriums, General Assembly processes... ..the simple truth comes back down to the question as to “WHY”? Why is Pennsylvania allowing politics to trump doing what is right for education? Why are we wasting taxpayer money we do not have on something that will only become obsolete? If this issue is truly about education... Why not take the time to address the real issues affecting education and work to resolve them before investing in new exams to ensure we yield the results we hope to garner from this investment? Why the piecemealing of something so important as our education system?

How does Pennsylvania plan to proceed forth with the Keystone Exams when adoption of the national standards is required by June 2010? Is it Pennsylvania’s intention to shell out \$201 million upfront in an untested initiative yet to be implemented, only to become superseded, in order to demonstrate commitment to the USDOE in order to garner more federal money?

In closing, while my comments have focused exclusively on the relationship between the current Keystone Exams proposal and the national standards initiative for international benchmarking. It is my hope to have clearly demonstrated in this short summary as to how the PDE’s initiative continues to be in conflict with not only the current legislature and grassroots levels, but, is consistent in its conflict with the USDOE’s criteria to advance school reform in the commonwealth of Pennsylvania.

Kimberly D. Geyer
Mars Research & Retrieval Services Policy Analyst
Mars Area School Board President
Midwestern Intermediate Unit 4 Board Member
451 Denny Road
Valencia, Pennsylvania 16059
Butler County, Western Pennsylvania
marsrrservices@zoominternet.net
724-799-1195

The Race To The Top Funds will reward states that have made the most progress toward:

- the adoption of internationally benchmarked standards and assessments that prepare students for success in college and the workplace,

- Building data systems that measure student success and inform teachers and principals how they can improve their practices,
- Recruiting, developing, rewarding (merit), reassigning, and retaining effective teachers and principals,
- Turning around our lowest performing schools.

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“States to See Change” Compiled by Kim Geyer of Mars Research & Retrieval Services, www.marsrrservices.com, June 16, 2009

While Pennsylvania battles the funding and development of new Graduation Competency Assessments and Keystone Exams, they might want to whoa their horses.

Twenty Governors met on June 14th and 15th from the National Governors Association in Cary, North Carolina, a suburb of Raleigh at the Governors Education Symposium held at the Umstead Hotel hosted by The Gates Foundation and the James B. Hunt Jr. Institute for Educational Leadership and Policy. Pennsylvania Governor Ed Rendell is Chairman of the National Governors Association and the event was closed to the public with the exception of the keynote address by USDOE Secretary Arne Duncan.

In the second of four speeches, Secretary Duncan announced that there will be a focus on the four reforms identified in the American Recovery and Investment Act and that those reforms will lead to the start of the “Race to the Top grant competition”. Duncan announced \$350 million in federal funds will be available to help states develop new common, national & internationally measured standards for student achievement to replace the current hodgepodge of benchmarks which vary from state to state. **Secretary Duncan indicated any tests developed for the new standards would likely replace existing state tests.** Duncan acknowledged developing the new common state standards would be relatively inexpensive, but, the majority of the funding would be utilized for the new assessments not yet developed. Duncan indicated that “he gets it” that standards must be vertically aligned with tests that are qualitatively different from the instruments now available and that he understands the political challenges. Duncan said, “At the end of the day, this comes down to leadership, partly in Washington, but mostly in state capitols all across America.”

"Standards shouldn't change once you cross the Mississippi River or the Rocky Mountains. Kids competing for the same jobs should meet the same standards," Duncan said. "Once these standards have been created – and reviewed by professionals in every state – I encourage you to adopt them. That's when everyone will know that you are serious. That's when your leadership will be tested because people will push back."

The movement to establish national and internationally benchmarked standards in math and language arts has gained momentum with 46 states and three territories since announced November 2008 in Seattle by The Gates Foundation in a policy shift moving away from state graduation competency assessments and again in the National Governors Association December 19, 2008 report called “Benchmarking For Success”. Every state except Alaska, Missouri, South Carolina, and Texas has signed onto the initiative.

It will be up to the states to adopt the new national/core state standards, but, the federal level plans to entice and provide resources to states with the “carrot and stick” to alleviate and overcome political difficulties. The money will come from the federal Education Department's \$5 billion fund to reward states that adopt education initiatives supported by the Obama administration.

Pennsylvania taxpayers need to be asking state policymakers why is Pennsylvania considering funding \$201 million for Keystone Exams during a \$3.2 billion deficit, which will only soon become obsolete as planned by the Obama Administration? How much evidence do policymakers need to recognize that the education plan being proposed by the Rendell Administration is null and void and that there's a much bigger plan which will supersede his? One would have thought, being Chair of the National Governors Association, his administration would have been one of the first to know the bigger picture planned for education coming from Washington?

Now, that the federal plan is transparent and publicly promoted, Pennsylvania Republican and Democrat Legislators should refrain from dedicating any funding to any education initiative soon to become superseded and furthermore obsolete in the future despite the philosophical and political beliefs held across the battlefield. To take any action contrary to this recommendation, would be fiscal irresponsibility and insanity.

Kim Geyer
Mars Research & Retrieval Services Policy Analyst
President of Mars Area School Board
Midwestern Intermediate Unit 4 Board Member

451 Denny Road
Valencia, PA 16059
724-799-1195
www.marsrrservices.com

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Pennsylvania Senate Education Hearing, February 19th, 2009, Testimony by Kimberly D. Geyer of Mars Research & Retrieval Services

Good morning! My name is Kimberly Geyer. I am President of Mars Area School District in Butler County, Western Pennsylvania, a board director of Midwestern Intermediate Unit 4 in Grove City, and sole proprietor of Mars Research and Retrieval Services, which is an independent policy research and information retrieval service available to all local and state policymakers statewide. I have actively engaged myself in advocating, studying, and researching education policy here in Pennsylvania since 1993 when the Casey Administration was in office. I researched and wrote the first Pennsylvania "white paper" on the PSSA in 1999 which has since acted as a template for other statewide education organizations long before it was popular to broach the issues associated with state testing and state assessments. Any views or opinions presented in this testimony are solely those of myself and may or may not necessarily represent those of Mars Area School District, its administration or board of directors.

I sincerely appreciate the opportunity to be invited by the Senate Education Committee to share my recent research in an effort to help connect some dots, so to speak, on issues contained within the core issue surrounding the Graduation Competency Assessment process being currently proposed by Governor Rendell's administration. In my testimony today, I am going to address some distinguished information related to the GCA process which will not be addressed by any other individual and/or entity here today at this hearing which will hopefully help you to formulate some present and future decisions with a bigger picture in mind.

I have compiled some actual quotes from The Gates Foundation website for your use, to point out how this is relevant to your deliberations pertaining to the proposed Graduation Competency Assessments. The Gates Foundation (Bill & Melinda Gates) financially support Achieve, Inc. who is the Washington D.C. based organization collaborating with Governor Rendell who sits on the board of Achieve, Inc. which contains three democrat governors and three republican governors. The Gates Foundation also financially supports The Education Trust and the efforts of The National Association of Governors. As you will see in my written testimony, the quotes in red print are related to The Gates Foundation and the quotes in blue print are related to those coming from Achieve, Inc.

"Standards for courses, high school graduation requirements, and state exit/end of course exams rarely translate into readiness to succeed beyond high school."

Source: The Bill and Melinda Gates website: "The College-Ready Education Plan: Basing Action on Evidence".

So why does it matter what Bill Gates thinks? The Gates Foundation has studied and evaluated formative research in the national field, as well as their own work since the year 2000 and should be commended as one of a small minority of Foundations nationwide who evaluate the effectiveness of the policies in which they promote and use this data to re-evaluate and shape new strategic plans. The evidence garnered over this

eight year span has enabled them to shift and shape their college-ready education plan which was announced November 11, 2008 in Seattle. As the Gates Foundation moves forward, they are committed to using evidence to guide their future education investments. Therefore, it is obvious The Gates Foundation is not going to support an agenda that is counter productive to that of their own foundation's goals and objectives.

For those of you who may be unaware, Achieve, Inc. who is responsible for promoting the agenda associated with the American Diploma Network which standardizes the states with exit graduation exams, published and released a report calling for the use of multiple measures in lieu of one assessment called "Measures that Matter : A Guide for State Policymakers" dated and copyrighted November 2008. As the seven blue printed excerpts below footnoted with page numbers demonstrate, Achieve, Inc. shifted their original policy stance in the Fall of 2008 the same month it was announced in Seattle by both Bill and Melinda Gates that they would be shifting their past policy stance. Contained in this comprehensive report, States are called to more closely align their standards, curriculum and course requirements, accountability and assessment systems and work with school districts to create a stronger foundation for high school improvement that is less punitive and has positive rewards and incentives. In addition, research and options intended to help states consider the various issues in developing a coherent college and career-ready policy framework is provided.

The Five Quotes Listed Below are from Achieve, Inc.'s November 2008 Report "Measures That Matter : A Guide for State Policymakers"

1. *"Rather than requiring students to pass college and career-ready tests for graduation, states should consider attaching more positive incentives. If the collaboration on tests is done correctly, students who score at the college-ready level can be guaranteed enrollment in credit-bearing, non-remedial courses in college. This will enable postsecondary systems and institutions to waive placement exam requirements, thus creating greater coherence between the two systems."* (Page 29)
2. *"States don't have to choose either large-scale summative tests or classroom tests; they can build high school assessment systems on a foundation of higher-quality standardized tests coupled with assessments that teachers will find particularly valuable. Combining multiple kinds of assessments strategically in state systems will generate better information about student's college and career readiness and shore up support among educators. States can play a leadership role in making these sorts of assessments available—and ensuring a consistently high level of quality—to schools and districts."* (Page 32)

3. “However, in most cases, the exit exams are not challenging enough to be modified into college and career readiness tests, so states will need to determine whether both are needed. If all students are being given an assessment of college and career readiness, and this assessment opens doors to higher education, does the state also want to guarantee that students have met the minimum skills tested on the exit exam? In some states, the answer will be Yes, and state education leaders will need to figure out How the exit exams relate to the new anchor assessments and how results will be factored into school accountability determinations. Other states may decide to phase the exit exam out over time as anchor assessments of college and career readiness take root.” (Page 29)

4. “The state role here should not be to mandate a single statewide interim assessment; states should take responsibility to ensure that all schools and districts have access to at least one full set of high-quality interim assessments. Districts should be free to use their own if they are of high quality. States may want to take a firmer approach with low-performing schools and districts by requiring those systems to use the state-provided tools unless they can prove that their own tools are equal or superior.” (page 38)

5. “Whether new tests are created or existing tests are modified, what is most important is that the statewide assessments measure essential skills and knowledge from the career readiness standards—and that the assessments do so in a way that guides instruction in the right direction.” (page 32)

Quotes listed below is from Page 7 of Achieve, Inc. & The Education Trust’s November 2008 Report entitled: “Making College and Career Readiness the Mission for High School: A Guide for State Policymakers” as contained in “Measures That Matter” report.

“The current standards-test-accountability model also has failed to prove itself to be very effective in improving high schools. These efforts have suffered from, among other things, a serious unwillingness to set very high standards, for fear too many students would be denied diplomas; from an overemphasis on sanctions, and an under use of positive incentives; from mixed and inconsistent signals to the co-producers of achievement: students and teachers; and perhaps most of all, from inattention to what happens in the basic unit of high school; the courses students take.” (page 7)

“States need a new approach to the system of standards, tests, and accountability in high school—one that makes college and career readiness the central driver and acknowledges where greater state leadership and state resources are essential to success.” (page 7)

The following month, Dec. 19th, 2008, Achieve, Inc. with the collaboration of the National Governor’s Association, released a report funded by The Gates Foundation called “Benchmarking For Success” now proposing “International Benchmarking” which would require national standards (meaning all states would have the same uniformed standards, same curriculum, technology, and same teacher alignment). Once national standards are in place and all states are standardized, international benchmarking can proceed in drawing international comparisons amongst countries globally, country by country.

Source: The Gates Foundation website entitled: “Encourage Commitments to Common State Standards and Goals Nationwide.”

“We’re working to ensure that schools and government define and measure graduation and college-readiness rates in similar ways. For example, for many years there has been no universal way to count students who drop out and those who graduate. To set goals and measure progress accurately, education stakeholders need to use a common language and arithmetic. We also support efforts to develop common state standards so that students in Massachusetts will learn the same key skills as students in Mississippi.” Quote from Bill Gates on The Gates Foundation website

My comment on the quote just read is that Common State Standards is another way of saying “national standards” or “standardization of all states”.

Let’s play devil’s advocate, let’s hypothetically imagine, I am wrong in my research assumptions. Let’s hypothetically suggest that Achieve, Inc., Secretary Zavorchak, or even the Governor himself, walk into this hearing room and suggest to you I am dead wrong and that I may have misinterpreted the report “Measures that Matter’s” findings and have thus drawn inaccurate conclusions based on the small sampling of quotes and excerpts from the report listed above in blue print. If that’s the case, let’s take a look at what The Gates Foundation is proposing, specifically, Bill Gates who is Achieve’s main funding source, in the red printed quote listed below:

“The first step in identifying effective teaching has to be setting fewer, clearer, higher standards that are aligned with the goal of graduating students from high school college-ready. You can’t compare teachers if they’re not pursuing a common standard. I believe strongly in national standards. Countries that excel in math, for example, have a far more focused, common curriculum than the United States does.” Quote from Bill Gates, November 11, 2008 Seattle Address

My comment: Again, reiteration is shown through words for support of national standards and international benchmarking as consistent with and supported by the recent release of the December 19, 2008, National Association for Governor's national report done with cooperation of Achieve, Inc. (same group proposing the GCA's) and funded by The Gates Foundation, to prepare states through policy shifting to move toward a national standards to enable international benchmarking when countries can be compared to other countries in a uniformed fashion.

The question begs to be asked, if this is the case, then **WHY is Pennsylvania contemplating moving toward the GCA process, during "the worst economic crisis of our lifetime" as quoted by Governor Rendell during his February 4th state budget address, if "The Gates Foundation" who is the "Source of Funding" and "The Influencer" is proposing an agenda course counter to what both Achieve, Inc. and our Governor is advocating and pushing to contractually commit our Commonwealth to?**

Why not wait to just move us to national standards and save our Commonwealth and taxpayers millions of dollars, extensive manpower, and extraordinary energy and effort? The December 19th NAG report has already been conceived and adopted by the National Association of Governors, so this agenda is not going to idly fade away, its going to take course within the next ten years maximum. There is a sense of urgency, so it will be hypothetically less than ten years is my estimation of time on national standards.

Furthermore, there are mechanisms, structures, and processes currently in place as required under Chapter 4 for measuring accountability, state academic standards and more specifically anchors, for identifying low achieving schools and students, requiring remediation and tutoring efforts. In addition, as you will see and I can prove firsthand, local school districts can and should take proactive measures into their own hands to ensure ALL students are meeting proficiency and identify those who are not and provide interventions which are evidence and research based, beyond remedial efforts. All school districts should be taking these measures regularly as the PSSA process is a continual refining process which helps to facilitate local refinery of curriculum, strategies, interventions, best practices, course sequence, budget prioritization, and accountability measures as required under No Child Left Behind.

Let's demonstrate where words are put into action and done so at a much more affordable cost:

Schools such as Mars Area School District as you will see on your pink sheet as contained in your packet, have restructured their math curriculum, restructured their math sequence of course offerings in a way that no student can circumvent moving toward a lower math and can only elevate themselves. This course of local action by design prevents these same students from having the ability to drop out of math after two years, and pushes them with the necessary support structure in place to proceed through at least three math courses in high school as required locally in

both our strategic plan and graduation requirements. Those who are in the higher maths, naturally can not descend into a lower math sequence. The majority of our students take four years of math. As you will see on pages six and seven of the pink packet, we can identify the students and make projections into five year plans and budget resources accordingly. MASD is in the process of passing a policy that will require all students to take at least three math courses inclusive of geometry in order to graduate. This course of action lends more rigor and relevancy to our curriculum and ensures that all students are leaving high school with measurement skills as 30% of the PSSA is based on measurement. In addition, we are contemplating passing a policy that states that any student in the eighth grade who scores basic or below basic in any area of the PSSA immediately goes into remediation upon 9th grade high school in lieu of having the ability to choose elective course offerings. This will also help aid in providing an incentive to those students to do well on the PSSA so they can take advantage of the wide course offering opportunities made available to high school students and also will allow us to remediate students before the 11th grade PSSA when it is too late to remediate students. Remediation at a lower grade level also strengthens the support system for failing students who are more inclined to drop out of school and as national research and evidence indicate, usually do so in their ninth-grade year of school. Mars Area School District has a less than 1% drop out rate and I know from experience, that we do everything in our power to ensure students stay in school by providing a safe and effective learning system to enable them to reach their maximum learning potential and earn their high school diploma because we are well aware of the alternatives for those who do not. As you will see on the bottom of page five of your pink packet, I've outlined the costs incurred to the Mars School District for the remediation software program selected by our teachers, staff, and administrators. This software will be utilized in a mobile lab capacity and used by students requiring remediation on a schedule of three days of class work and two technology lab days. This mobile computer lab will be made available to all students needing remediation in any of the four areas of the PSSA, such as reading, math, writing, and science to supplement their daily coursework and reinforce concepts. It is important to note that the Classrooms for the Future Grant provides one mobile lab to each school recipient of the grant. So it is very likely, if a district already has a Classrooms for the Future Grant, they could already be potentially prepared to implement a mobile lab at no additional cost to their district.

Let's read below a quote by and from The Gate's Foundation as per their new approach as contained in their executive summary of their college-ready plan:

"We have set an ambitious goal for our work and investments: to help ensure that 80% of high school students graduate college-ready, with a focus on low-income and minority young people reaching this target." Source of Quote: Bill and Melinda Gates Foundation

My comment: The Gates new approach does not make mention of the use of EXIT EXAMS in their entire new college-ready plan, other than to suggest their eight years of

research and evidence does not support they make a difference in college readiness. Do you think with exit exams in place, that the above mentioned ambitious goal of The Gates Foundation, could be realized?

Why not? I believe it is evident that the Gate's Foundation's own findings over the course of the last eight years, have proven themselves that exit exam processes in other states who have them, is a gatekeeper to minorities and all student sub groupings under the No Child Left Behind Act, preventing these students from pursuing higher education opportunities. It is my impression that The Gate's Foundation believes and states on their website "that every life is equal" and every life deserves to have the same opportunities as they believe that education is the great equalizer globally and is also the objective of escaping life long poverty in all countries. The Gate's Foundation to their credit recognizes these facts, and is intent and focused on clearly helping low income and minority youth to achieve and gain access to post secondary education.

National research and evidence suggests that the exit exam process in various states deters minority, ESL, low income, and immigrant students from achieving this goal. Exit exams are and act as a gatekeeper in preventing those to have access to the same opportunities as other students. They are penalized ten fold when they are a product of their own school system who may be low achieving and under performing as a result of their zip code and not necessarily to any fault of their own. States with exit exams, even the New York Regents, have thousands of students not graduating with high school diplomas annually and are now remediating young, unemployed adults in statewide GED Centers, just as Florida and California are, and being done so at taxpayer's expense to some extent. GED remedial costs far exceed the 30% remediation rate in colleges nationwide which has been the same rate of remediation since 1989 according to the National Center of Education Statistics. Remediation is needed as we have various intellectual levels of students, child by child, student by student. Some kids get it which enables them to be at the higher achieving level, some simply do not, which are at the lower end of the spectrum, and some are middle learners. There will always be remediation and there is no test, standards, or assessment which will eliminate it entirely. We should be asking ourselves, "What supports can we provide for students needing remediation to help these students reach their maximum learning potential?" While much of the focus of this aspect has been entirely on the high school level, we now understand the need for early basic skills and knowledge at the primary and middle levels as well as the need for identifying students at earlier ages and grade levels in lieu of pushing them through the system. For example, schools, in general do no favors for students who are promoted to the next grade level with their chronologically aged peers when they are two grade levels behind in reading. With the use of multiple measures, primary and intermediate levels of local school districts can identify younger and younger students and provide resources and remediation. With the use of Pennsylvania value-added assessment we can combine assessment data to offer a more meaningful evaluation of individual students by tracking student's growth from year to year. So even if a student does not score at a proficient level on the PSSA, a value-added assessment using the PSSA data could reveal the student's individual growth. For example, a student may be two years behind in math at the beginning of the school year. At the end of the school

year the student may only be six months behind. Although the student may continue to score in the basic or below basic range on the PSSA, he has actually learned more than a full year of math.

In closing there are five questions policymakers need to ask before deciding to implement the Graduation Competency Assessment process as proposed:

1. Why are we implementing a NEW education program when it is not necessary and much of the same goals and objectives can be accomplished with the refining of the current process and mechanisms which currently exist associated with the PSSA?
2. Why are we implementing a program proven to be ineffective in enabling students to be college-ready as evidenced by other states and with no distinctive track record proving otherwise? (Gold Paper in Packet)
3. Why are we implementing a new initiative that will cost our commonwealth millions of dollars, when it will cost even more millions to convert to the new policy shift and agenda being proposed by the catalytic and political winds of the NAG which counter the current proposal by our own Governor and his administration?
4. Why would we implement and invest millions of long term debt and new spending into committing our Commonwealth to a reform when it is currently not clear and concise as to what the federal education agenda will be by both the new President of the United States and/or his new Secretary of Education who is able to begin a new strategic plan for education in lieu of No Child Left Behind?
5. Why would we be implementing any new programs, structures, and/or processes when we cannot afford to sustain the effective programs and services we currently have throughout the Commonwealth?

Conclusion:

This process began back in 2005 when PA became a part of the American Diploma Network and in 2007, the Governor and his leadership team introduced this proposal as addressing a disparity issue between the local assessment and PSSA, when they were reminded there was already a process which allows the PDE to intervene in the event there are deficiencies or disparity within any given district with the local assessment and the PSSA, the new argument became about “making the high school diploma more meaningful”, when due to lack of research and evidence that the states who’ve implemented this initiative had no outstanding distinctive evidence supporting this argument, the shift and crisis became about “remediation”.

Remediation will not be eliminated regardless if you implement the GCA process as proposed or any other exit exam alternative. Remediation will not be eliminated if you keep the PSSA or do both the PSSA and the GCA. There are numerous variables which play into whether or not students are college ready or not. There are no easy solutions and there’s no amount of money to fix all the variables which make up the total equation.

High schools are working hard to prepare students, however two and four year colleges in the state of Pennsylvania have not clearly articulated the baseline knowledge and skills entering students need, to begin college without remediation. There needs to be a consistent message sent by Pennsylvania's two and four year college institutions which is consistent to ensure educators who teach and prepare our students at the middle and high school level, as well as, our students **know exactly first-hand what college-ready actually mean. That has not happened yet. There is no consensus, no consistent baseline established statewide.**

There is an obvious disconnect in education between the high school and college level and the college level and workplace....lack of communication as well as consensus. Of the 65% of public high school students that must pass an exit exam in order to graduate, the 24 states with exit exams (done with the help of Achieve, Inc. through the American Diploma Project) only six states indicated their exit exam process was designed to measure the knowledge and skills needed for college, while only nine of the 24 states said their tests were intended to measure readiness for the workplace....this according to the Center on Education Policy's national survey and white paper on "High School Exit Exams" released on September 6th, 2007. (Gold Paper in your packet.)

There is a process in place is with the PSSA, however, there is no denying that refinement is needed in a multi-pronged approach to address these and other issues which can enable us to prepare our students to be college ready without the extensive proposed course of action our Governor is now proposing for millions of dollars. It will take work, but, it can be achieved and it can be achieved with less tax dollars than the alternative proposed and we can still proceed forward competitively as a Commonwealth regardless if national standards see fruition or not. The process of having students graduate high school with the knowledge and skills necessary to be successful in college or the workplace begins much earlier than the beginning of high school or in the 11th and 12th grades of high school.

Senate Bill 307 will provide an incentive and instill a serious expectation for ALL STUDENTS in taking the PSSA as early as 3rd & 4th grade. The phase-in will enable education buy-in by all as the expectations and consequences will be spelled out ahead of time and will be consistent statewide. The course of this action will force remediation to take place in the lower grade levels and at an earlier age for identifying students through various multiple assessments and screenings. While advocates of local control will not be pleased with the state level making the decision for student promotion from grade level to grade level....one way of looking at this, is the pressure will be lifted off the building administrators and staff for this decision-making which would entail some subjectivity in the criteria utilized by school officials for making student determinations and enable consistency with no room for subjectivity or public influence district by district statewide. Schools will be able to continue to provide differentiated instruction to meet the needs of those needing remedial help and that continuity can continue with the use of the PVASS (Pennsylvania Value Assessment System) and other models which evaluate student achievement and this can be accomplished at a much more affordable cost to local districts in comparison to the GCA model currently being proposed. Furthermore,

schools will be forced to align their curriculum to the standards earlier in the lower grade levels, make internal adjustments to their curriculum and instruction, evaluate best practices, and work to refine their education programs and services. The language as contained in Section 1611 of Senate Bill 307 will help to safeguard and preserve the integrity of the process of establishing statewide graduation requirements and expending funds only by an act of the General Assembly as actions speak louder than words when the Governor's administration disregarded not only the regulatory moratorium but also the public's trust. Their actions related to this matter demonstrated that while they may respect the legislature's usefulness, they don't respect their authority.

Pennsylvania will support leadership which acts responsibly in supporting sound educational practices and principles to Pennsylvania's schools. Never forget the difference between good-sounding reasons and good sound reasoning.

May you have the courage and fortitude to do what is necessary for our Commonwealth's best interests and more importantly, our student's futures.

Thank you,

Kimberly D. Geyer
President of Mars Area School District
Mars Research & Retrieval Services Policy Analyst

Address: 451 Denny Road, Valencia, Pennsylvania 16059

Phone: 724-799-1195

Fax: 724-625-1617

E-Mail: marsrrservices@zoominternet.net

Website: www.marsrrservices.com

2696

RESOLUTION #

**A RESOLUTION OF THE BOARD OF SCHOOL DIRECTORS OF THE
MARS AREA 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 at a cost yet to be determined. 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 has not been appropriated by the General Assembly at this time;

WHEREAS, the costs associated with validation yet to be determined 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 associated with amending standards to the new state model of curriculum being developed despite the legislative moratorium imposed 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 Mars Area 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 Mars Area 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 as depicted in both the Orié and Saylor legislation; 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 Mars Area 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 2nd day of June, 2009.

ATTEST:

MARS AREA SCHOOL DISTRICT

Board Secretary, Jill Swaney

President, Kimberly D. Geyer

Superintendent, Dr. William G. Pettigrew