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**From:** Bucci, Lisa L [lisa.bucci@highmark.com]  
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**To:** IRRC  
**Subject:**

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POSTED TO PUBLIC

To Whom It May Concern:

I am writing to express my opposition to the current proposed final form Chapter 4 regulations to require Keystone Exams as end of course/graduation requirements for students.

The "meaning" of a high school diploma is quantified by employers and colleges in the grade point average and the SAT scores. This plan will unfairly distort the "meaning" of the Grade Point Average by factoring the value of one standardized test score to count for 1/3 of a student's grade.

It is unreasonable that students scoring below basic on a Keystone Exam or on a module get NO credit for what they do know, but instead will be given a 0% for 1/3 of their grade, rather than the score they have earned on the test. The weight of 1/3 and the 0% floor will unfairly affect students competing for acceptance into colleges and for scholarships.

It is unfair that students who score Proficient will have that score count as 1/3 of their grade with no chance to increase that score, while other students who may score slightly less than Proficient will have another opportunity to raise 1/3 of their grade by re-taking the exam.

Replacing our rigorous mid-terms and finals with Keystone Exams will serve to narrow the curriculum in high schools across this state. For example, it is not educationally in the best interest of students to administer the same Keystone Exam to students in General Biology, Accelerated Biology, and Honors Biology, replacing the assessments that have been designed to reflect the rigor of those various courses.

Although the proposed Bridge Project offers an alternative pathway to allow some bonus points, the weighting and 0% floor in this plan, and resulting effect on GPA, causes the Keystone Exams to be more "high-stakes" than the original "pass/fail" GCA Plan. Even though the Maryland Plan offers Bridge Projects, Maryland's student dropout rate last year increased to over 27,000, just as the dropout rates have increased in other states that use exit/end of course exams (CA, FL, MA, OH, etc.).

Not all students in Pennsylvania have access to the same resources in the classroom, and those resources are reflected in the facilities, the classroom materials, and in the quality of the teachers. It is not fair to measure all students by the same measuring stick and withhold a diploma on that basis.

The costs of staffing 10 qualified professionals for summer remediation for ten subject areas, staffing of coaches for Bridge Projects, record keeping costs, test and Bridge project administration and scoring, new K-12 textbooks to align with statewide K-12 curriculum, professional development, and bus transportation will divert scarce resources out of the classroom on a plan that has no basis in research and will force us to cut other worthwhile, proven programs.

The logistics of staging summer remediation during the months when necessary maintenance, repairs, and improvements to our facilities are to occur is an unreasonable demand on our school districts and presents a safety issue for students.

The current assessment system, along with the state's investment in PVAAS, already tells us what we need to know and which students need help. Another set of high stakes tests to tell us what we already know, is a waste of resources. Money should be spent teaching rather than in more testing.

Lisa Bucci  
1152 Rockwood Drive  
Jefferson Hills, PA 15025  
(412) 817-6113

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