

2696

From: Julia Fisher [jfish3@verizon.net]
Sent: Wednesday, September 02, 2009 9:38 AM
To: IRRC
Subject: Keystone Exam comments

September 2, 2009

Independent Regulatory Review Commission
333 Market Street
14th Floor
Harrisburg, PA 17101

Dear Independent Regulatory Review Commission Members,

I am writing again to express my concern over the Keystone Exams. It appears certain changes were made to the proposed Keystone Exam program since last summer. However, it seems to me there are still deficiencies in the Keystone Exam program as follows:

- I am concerned about the portion of the regulation apparently intended for students who do not test well. I understand a student may be allowed to complete a project-based assessment as a supplement to the Keystone Exam. Although I applaud the inclusion of this alternative I am disappointed with the requirements. Why does a student have to take and fail the Keystone Exam twice before a project-based assessment is an option? This section of the regulations unfairly punishes those students who do not test well. If a student is, according to the requirements, already satisfactorily participating in supplemental instruction service (which probably is an additional course and time), it would seem to me the requirement of a second attempt at the Keystone exams is burdensome. Will a student end up taking all 10 Keystone Exams because they are trying desperately to pass six? What if a student ends up failing multiple tests, the requirement of two failed Keystone Exams before the project-based assessment begins only compounds the problem. What will this alternative track and its incredible work load do to the self esteem of the students? Will these students be more inclined to drop out of school if they feel the Keystone Exam requirements are too onerous for them?
- Of note, there are former and current students in our district who did not score proficient on the PSSA tests, but are attending or have already been accepted to good colleges. I'm sure the colleges are aware of their PSSA score and apparently they are looking at the students' other strengths as demonstrated in ways besides standardized testing. What happens to a student who does not score proficient on the Keystone Exams but is accepted into college? Will you hold back these students because their learning style does not match the narrow confines of high stakes testing determined by people in Harrisburg?
- The Keystone Exams will be offered three times a year. There will be 10 Keystone Exams, so that's 30 additional testing days (if they are only one testing day each). Even if they only have to pass 6 of the tests, some students may end of taking more if they feel they can't pass a certain Keystone Exam with multiple tries. Although this may give students more opportunities to try to pass the Keystone Exams, it really seems like a lot of extra work and stress for the students as well as the teachers and staff. It seems to me that the curriculum and instructional time will suffer as more time is spent on preparing for, taking, retaking and administering the tests. We have already seen this with the implementation of the PSSA testing program.
- Students with IEPs may not be required to take the Keystone Exams. But will the teachers be focusing more on the non-IEP students getting them ready for Keystone Exams and less on those with IEPs, even if unintentionally? This certainly sounds like a possibility with 10 new tests, each given 3 times a year.
- Does anyone know what will be on these Keystone Exams yet? Who knows if our district's high school curriculum is in line with the future standardized tests? Will our high school have to revise the curriculum, maybe taking out pieces that benefit the students in areas not related to high stakes testing such as

creative and critical thinking? It would be a shame to have to remove or reduce these more subjective areas that are so important to college and career success in a world where global competition is the norm. What has the PDE done to demonstrate the need for the Keystone Exam program anyway?

- I see the 11th grade PSSAs will be eliminated under the Keystone Exam program. While this is an improvement over the original proposal, it still concerns me that a second program apparently is being created. Will the Keystone Exams be a completely different program from the PSSAs with its own administrative costs? It would seem to me having the PSSA and Keystone Exam program connected in some way would make for a more efficient and effective state testing system.
- I understand there is some concern that the State Board has the statutory authority to determine specific graduation requirements. I would hope the IRRRC would address this issue before considering the current Keystone Exam regulations.
- At the end of the PDE's summary of the Keystone Exam regulations (as noted on their website) is the comment "The development of Keystone exams will be phased in over several years, spreading the cost of test development and administration well into the future." I would not consider 5 years until implementation "well into the future." I'm sure long before the implementation date of the exams the districts and state will need to spend significant time and tax payer money to prepare for the Keystone Exam program. In my opinion, this statement by the PDE is an insult to the question "how and who will pay the costs." It appears this will be yet another unfunded mandate.

I appreciate your time and attention to this very important issue.

Sincerely,

Julia Fisher
Tredyffrin/Easttown resident

510 Green Hill Ln
Berwyn, PA 19312

cc: Tredyffrin & Easttown school board
Dr. Dan Waters, T/E Superintendent
Senator Edwin Erickson
Representative Duane Milne