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NORTHWESTERN LEHIGH SCHOOL DISTRICT



6493 ROUTE 309, NEW TRIPOLI, PA 18066-2099
(610) 298-8661

Kim Kaufman, Executive Director
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

RECEIVED
SEP 15 2009

September 9, 2009

Dear Executive Director Kaufman:

As School Board Directors of the Northwestern Lehigh School District, we are writing to express our concerns over the current proposed final form Chapter 4 regulations to require Keystone Exams as end of course/graduation requirements for students.

While we recognize the potential of these assessments in that they are course-specific and could provide timelier data since they are administered at the end of courses, we have significant concerns, outlined below, which greatly outweigh the potential benefits of the current proposal for the Keystone Exams at this time.


1. Cost – With a multi-billion dollar deficit, the state budget at an impasse, and the potential for proven educational programs to be cut, it is unreasonable and imprudent to spend millions of dollars in the development of a series of new exams and the outlying costs associated with them.

2. New/Unfunded Mandates – Both the validation of local assessments, which are estimated to cost \$5,000 to \$15,000 per assessment, and the expenses associated with paying for a new regional bureaucracy to score alternative pathways included in the proposal, will require school districts to pick up additional costs. In turn, this will result in an additional financial burden to local taxpayers, and will force local districts to cut proven existing programs.

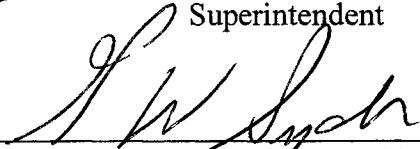
3. High-Stakes Testing – In the proposal, students scoring below proficient on any Keystone Exam will automatically be given a 0% for 1/3 of their grade in that course. We believe that students should be given credit for their actual level of achievement on the exam. The weight of the 1/3 and the 0% floor will adversely affect the lives of many students. Additionally, it is unfair that students scoring proficient will not have the opportunity to increase their score (1/3 of their grade), 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.

We urge you to address the issues outlined above before the Keystone Exams are developed any further.

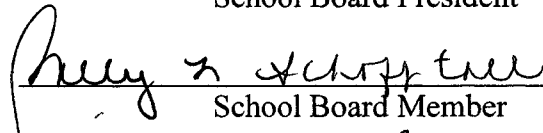
Sincerely,



Superintendent



School Board President



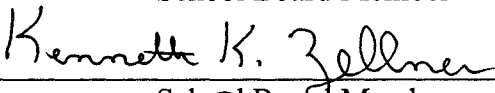
School Board Member



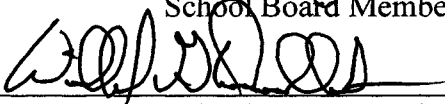
School Board Member



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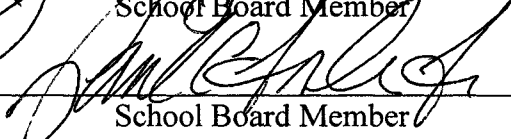
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Mr. Donald J. Link, School Board Member, refused to sign this letter due to his extreme frustration with our Legislators and the Legislative process. Please note that he feels communication with Legislators is of no use.