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House of Representatives
COMMONWEALTH OF PENNSYLVANIA
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The Honorable Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

Dear Chairman Coccodrilli:

As Republican Chairman of the House Education Committee, I would like to submit these comments relative to the State Board of Education's final-omitted regulation #006-322 – Common Core State Standards.

It is agreed that setting high academic standards for our students is one of the most important steps in creating a comprehensive and interconnected system of education that fully prepares students for life, whether that is higher education or entrance into the work force. We, the Republican Members of the House Education Committee, are pleased that the State Board has taken steps to set mathematics and English/language arts (ELA) standards aimed at college and career readiness that are intended to challenge students.

However, I would like to raise three areas that are important to the Republican caucus: local control, educational system efficiency and effectiveness and fiscal impact. We believe those in decision-making positions must be cognizant of the impact, intended or otherwise, that these changes will have on the system as a whole including the pedagogy, diagnostics and materials needed to prepare our students to master these standards. We must be sure to assess how these new standards fit into our current system of instruction, assessments, evaluation and accountability. A cohesive educational system is one in which all aspects are aligned, integrated and result in students' academic success.

Local Control

We recognize the usefulness and fairness of common standards shared across state borders. It is important for states to set clear and rigorous standards that aim to prepare all students to become contributing members of society after their formal education is completed. While we believe uniform standards will play a role in the educational system across the United States, part of the foundation of Pennsylvania's educational system is local control and must be protected. Consequently, control over curriculum and materials should be left up to local school districts. We are pleased that this remains unchanged in the regulatory package.

Educational System Efficiency and Effectiveness

a) Assessment and curriculum

As you may recall, the Department of Education (PDE) commissioned Penn State to assess the validity of local assessments and found that the school district alignment of the standards, curriculum and assessments varied widely - ranging from no alignment of content and standards to outcome, to instances where all content, standards and assessment to student outcomes were aligned. This disconnect was used in part to justify the Keystone Exams initiative.

We believe that it is important that assessments are aligned with standards so that academic achievement is measured accurately and effectively. PDE does indicate that these Common Core standards will be integrated in the Pennsylvania System of School Assessments (PSSA); but, the regulatory package gives no indication of how these initiatives will be aligned with the Keystone Exams.

Last year, PDE entered into a contract for the development of the Keystone Exams initiative. The development of the Keystone tests and related curriculum and diagnostics will continue over the next few years. It is suggested that PDE work with the contractor to ensure there is linkage between all the system components in order to reduce any duplication of effort and the misuse of taxpayer resources.

Additionally, the regulatory package indicates that the Race to the Top initiative (RTTT) is the reason for the standards to be adopted and promulgated as final-omit regulations. It should be noted that RTTT is also

funding the development of assessments aligned with the Common Core standards. According to USDOE's website, there are two grant categories: the *Comprehensive Assessment Systems* grant category with an award size of \$160 million and the number of awards is estimated to be 1-2; and the second category is the *High School Course Assessment* grant with an award size of \$30 million to one recipient. The development of such assessment systems will be completed by a consortium of states and Pennsylvania is a member of the consortiums vying for funding in both grant categories.

The questions then become will the Keystone Exams be replaced or rendered unnecessary once the new federally supported assessment systems are aligned with the Common Core standards? How do all these assessments support our educational system?

b) Implementation

Giving school districts three years to phase in the implementation of these new standards is an important consideration, both for school districts and for the benefit of students. Because full implementation is not required until July 1, 2013, school districts will have the time it takes to review curriculum and materials, and provide teachers with necessary professional development. Implementation of the Keystone Exams initiative also spans these same fiscal years and as such, coordination between the two projects will be essential.

Fiscal Impact of Standards

During this time of financial crisis, it is important to consider the fiscal impact of any changes to our educational system. The regulatory package maintains that cost implications are negligible to school districts and minimal to the State. It is these assertions that raise some concern due to the rationale and documentation justifying past proposals.

The regulatory package states that the Common Core standards are well aligned with Pennsylvania academic standards as a consideration in compiling the cost estimate. As noted earlier, the Penn State study concluded that there is a wide variation of school district alignment between content, standards and assessments and student outcomes. It should be recognized that while coordinating standards, curriculum,

instruction and assessments is necessary; it must also be acknowledged that such synchronization comes with a cost and careful planning.

Pennsylvania expends millions on the PSSAs, and as noted in the regulatory package, the Common Core standards will be integrated within the PSSA. However, also noted is that fact that millions of taxpayer dollars are being spent on the Keystone Exams which were not mentioned in the regulatory package.

The February 2009 Keystone Exams' cost estimates for the paper tests, model curriculum and diagnostic tools was over \$117 million (an additional \$73 million is estimated for scanning, scoring and online test development). This is just development costs, not expenses related to textbooks and instructional materials needed by the individual school districts implementing the initiative. During the recent budget cycle, one district (with less than 3,000 students) approved the expenditure of over \$550,000 for their K-12 Science textbook/technology curriculum.

While PDE is to be congratulated for providing access to the model curriculum and materials through the Standards-Aligned System (SAS) at no cost to school districts, the purchasing of textbooks and materials supporting the curriculum comes with a cost.

Conclusion

We need to be sure that the framework and model curriculum being accessed by the school districts are linked with other education initiatives being developed at the State level. As noted earlier, a cohesive educational system is one in which standards, instruction, curriculum and assessments are aligned, and it remains to be seen how interrelated the Pennsylvania system will be once all of these individual pieces are finished.

Adopting rigorous academic standards is a necessary step towards challenging our students academically and in preparing them to be college and career ready. However, simply setting standards without improving teacher quality and accountability will not help our children, but hinder them. We, as elected officials, must be mindful as we change and improve certain aspects of our educational system while leaving other aspects unchanged and unimproved will result in a fragmented and ineffective system.

The Honorable Arthur Coccodrilli, Chairman

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It is our hope that the revisions to the academic standards will lead to improvements across the spectrum of educational services, resulting in an organized, effective and accountable system for the betterment of our children.

Sincerely,



PAUL I. CLYMER

Republican Chairman

House Education Committee

cc: Republican Members of the House of Representatives
The Honorable James Roebuck, Majority Chairman
House Education Committee
The Honorable Jeffrey Piccola, Majority Chairman
Senate Education Committee
The Honorable Andrew Dinniman, Democratic Chairman
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