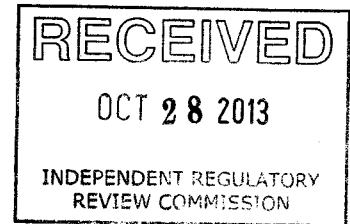


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October 20, 2013



To: The Pa Independent Regulatory Review Commission  
Re: Public Comment Period for the Chapter 4 Regulation ( State Board of Education)

I had previously commented last November about the Chapter 4 changes, but I would like to again comment on some things that should have been looked at more extensively.

First of all, I have taken the time to speak with districts that have started to implement these changes. The State Board and Department of Education are saying, " there is a provision guaranteeing supplemental instruction for any student who does not demonstrate proficiency on the Keystone Exams." Unless the Dept of Education and the State Board intend to find funding for the school districts, or re-negotiate teacher contracts this is something they CANNOT guarantee. With many school districts having budget issues over the last few years, and many of the problems facing schools like the pension issue unresolved, districts have had to furlough staff. What staff is the districts suppose to use to help with the remediation process when they have had to cut back? Do they take teachers out of the classroom, and away from the other students? What about the teacher contracts? Districts cannot just assign a teacher the responsibility of handling remedial help for students without a supplemental contract at least, which means additional funding issues. The higher number of students who need remedial help the more this becomes a problem, and the more the cost plays into the situation.

In order to control costs, some districts are considering holding a student back if they do not do well on the Keystone. It is cheaper and easier to have them repeat the whole class than to deal with remedial help. This could create a discriminatory situation given some districts may have the funds to provide remedial help while others will find it necessary to have students repeat the whole class. Even if districts use online tutoring for the students needing help that still involves a teacher or staff person to make sure the students are getting the help they need. It seems like the focus of these Chapter 4 changes has more to do with shoring up the students on the bottom instead of challenging all students to achieve to the best of their ability.

The Department of Education and State Board should be required to submit a cost analysis with every proposal and regulation change they present. They were asked several times in Senate hearings about cost, and they were dragging their feet in answering that question. The IRRC questioning the cost is very important, and this is not cost neutral. To even imply cost neutrality is inaccurate and misleading.

In every justification for making these standards and testing changes comes the comment related to college and workforce readiness. If that is the true objective then the concept of allowing students to do a project in lieu of continuing to take the Keystone test is counter to that objective. What the project becomes is a form of social promotion. Again having taken the time to speak with school districts, they are very confused about the project idea, feel it will take a great deal of time from staff, and again what will it cost in

time energy and money. I spoke with one district that heard the project- in lieu of the Keystone Exam- is to be eliminated. (The way much of this information has been conveyed to the districts is unacceptable, and the individual interpretations of the 29 Intermediate Units may well be part of the problem.) Either students can do the actual math or they cannot. If they cannot then it would be better to find out why than to give them a project to do.

In the comments from the State Board and Department of Education , they reference ACT 82 as justification for the potential increase in the number of Keystone Exams. Reading ACT 82 how does this help students to learn. It sounds like all of this testing has more to do with teacher evaluation than a student making a year's worth of progress. Pennsylvania was warned when they went from the normed based testing ( achievement tests) that the state was creating a problem. Parents and teachers need to be on the same page with testing results. Giving parents half a picture with PVAAS data is not what they need. Families are part of the learning process. They need to know more specifics on the weaknesses and strengths their students have.

I had a lengthy discussion with early learning teachers, and they are not at all happy with these changes. They feel they should have more input into what happens that impacts their classrooms. These changes are not considered to be developmentally appropriate practices based on the cognitive development of early learners. Too often these changes are made by people that have not been in a classroom for many years if at all, and they forget what it is like to work with young children.

There is still confusion about the local validation process. The state is making it more costly and more difficult to have districts validate their own assessments thus forcing them to use the Keystone. This is also a concern because of the school district tests used for classes like Honors Algebra I that may be better used for math classes at a higher level. Also there is a deep concern related to the changing of the math sequences given the College Board is saying they may eliminate the AP Calculus test given it is no longer part of the standard math sequence. One of Pa's own Intermediate Units indicated this change in math sequence is a good idea. However, this does not meet the needs of STEM nor does it meet the needs of students who are more advanced.

One of the things that wasn't discussed through this whole process is whether the changes in the Pennsylvania Standards show higher quality. Under Gov. Ridge's administration, Paul O'Neal the head of Alcoa ( so business did have input into the education standards previously), was chair of the education standards committee. Within the documents he submitted to the Governor it indicated the previous standards in core areas like math and language arts to be rigorous. Now the State Board is saying those standards were not rigorous but now they got it right this time. We had the current standard changes analyzed by national experts, and these standards are not high quality workforce or college ready standards. The National Common Core Pennsylvania did use were some of the worst standards amongst all of the National Common Core written.

Because of the question of the quality of the standards- instead of doing a review of the changes every 5 years- the public deserves an analysis every year starting this year. Any committee developed to do the review should not only be comprised of members from the Community College system or the State University system, but must include members from places like the University of Pennsylvania, the main campus of Penn State, and a university like Carnegie-Mellon in Pittsburgh. The later schools have higher entrance requirements and expectations for their students, and are better able to understand the needs in STEM areas. Expectations from the Community Colleges, and the State University system sets the bar too low.

Also if the State Board and the Department of Education are going to continually use national talking points like internationally benchmarking then they must clarify what that means and how that relates to Pennsylvania.

None of these changes will help financially struggling school districts like Philadelphia or Harrisburg. The whole process involved with the changes in standards and testing this time has shown a tremendous disconnect between the State Board/Department of Education and what is happening in the local districts. The fact the State Board and Dept. of Education continually get involved in under-funded mandate situations is no longer acceptable. If anything these changes could well push more students to drop out because nothing shown in these Chapter 4 changes would motivate a student to continue on. If anything being confronted with taking a test more than once could prompt these students to leave.

I just received an email from a college instructor about the math standard changes. Her background is in math, and the changes in math with this group learning is causing parents to have to spend more time at home with their children on math. I have heard that from folks from the eastern end of the state to the western end of the state. What happens to the students who don't have parents who can help them with this math???????????

It would be nice for once to have an open and honest discussion on what we need to do as a state to really help these students. It is also unfortunate that these Chapter 4 changes will not help these students to be anymore college or workforce ready.

Sincerely,



Cheryl E. Boise

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Pittsburgh