

Cooper, Kathy

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From: Mary Curley <MaryC@cciu.org>
Sent: Monday, November 04, 2013 5:29 PM
To: IRRC
Subject: Written Comments Regulation #6 – 326: Academic Standards and Assessment
Attachments: IRRC Superintendent Keystone Letter_11_04_13.pdf; IRRC Superintendent Keystone Letter_11_04_13.pdf

Importance: High

2013 NOV -6 AM 10: 09

Dear Chairman Lutkewitte and members of the IRRC:

I am writing on behalf of the four IU executive directors of Bucks, Chester, Delaware and Montgomery Counties and 55 public school district superintendents from those counties. Thank you for the opportunity to present written comments regarding Regulation #6 – 326: Academic Standards and Assessment which amends existing regulations to reflect Pennsylvania's Common Core Standards in English language arts; address test security concerns; and require students to demonstrate proficiency on the Keystone Exams in order to graduate from high school.

The attached position paper outlines the major challenges and concerns with the current implementation strategy of the Keystone Exams and Pennsylvania's school accountability system. As a result, 55 Pennsylvania public school superintendents and four IU executive directors from southeastern Pennsylvania urge the Commission and our legislators to re-examine the regulations requiring Keystone Exams for students' graduation, expanding the required number of Keystone Exams from three to five, and to using a single, high-stake test to measure individual student learning and achievement.

The attached document:

- Describes the concerns public school districts have with the implementation of the Keystone Exams;
- Details the challenges caused by increased testing, changing accountability systems and poor communication; and
- Expresses the need to re-evaluate the need for high-stake testing and how the results are used to evaluate our students, our teachers and our schools.

Thank you for your time and your consideration regarding this matter.

Best regards,

Mary Jeanne Curley
Communications Director

Chester County Intermediate Unit
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A Coalition of Pennsylvania's Public School
Superintendents and Intermediate Unit Executive Directors 2013 NOV -6 AM 10: 09

November 5, 2013

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

Dear Chairman Lutkewitte and members of the IRRC,

Thank you for the opportunity to present written comments regarding Regulation #6 – 326: Academic Standards and Assessment, which amends existing regulations to reflect Pennsylvania's Common Core Standards in English language arts; address test security concerns; and require students to demonstrate proficiency on the Keystone Exams in order to graduate from high school. Specifically, the following comments are in regards to the impact of implementing the Keystone Exams as proposed in the Chapter 4 regulations.

First and foremost, Pennsylvania public schools are committed to making education in Pennsylvania second to none. Despite the many challenges of meeting the needs of all learners during the worst economic crisis in generations, Pennsylvania's public school educators firmly believe that all students should be required to think critically and apply their learning and skills in realistic and meaningful ways and that all educators should be held accountable for the learning that takes place in their classrooms and their schools.

However, there are major challenges and concerns with the current implementation strategy of the Keystone Exams and Pennsylvania's school accountability system. As a result, the undersigned Pennsylvania public school superintendents urge the Commission and our legislators to reexamine the proposals requiring Keystone Exams for students' graduation, expanding the required number of Keystone Exams from three to five, and to using a single, high-stake test to measure individual student learning and achievement.

The following information will:

- Describe the concerns public school districts have with the implementation of the Keystone Exams;
- Detail the challenges caused by increased testing, changing accountability systems and poor communication; and
- Call to re-evaluate the need for high-stake testing and how the results are used to evaluate our students, our teachers and our schools.

1. Impact of the Keystone Exams

The Keystone Exams, originally designed as end-of-course exams, were re-purposed in 2012-13 to be an accountability measure to replace the 11th grade PSSAs. This change in direction increased the hours of testing time for many students. For example, this year, high school students were required to take Keystone Exams in biology, literature, and algebra (often years after students had taken the courses). This type of testing (and re-testing for students who were not proficient) created unanticipated hours of planning for test preparation, administration, remediation and review.

The increased testing impacted school district staff, students and their families. For example, students



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spend up to three to four weeks taking the Keystone Exams, AP exams, and their schools' final exams. In addition, students also take the PSAT, SAT and ACT college entrance exams in the spring. This overlap of the Keystone Exams, AP testing and college board exams places an undue burden on students and wastes precious teaching time for exam review.

High school students are not the only students affected by multiple testing. Eighth graders are also negatively impacted. Since many students take algebra in the eighth grade, students must take the PSSA and the Algebra I Keystone Exam at the same time. High stakes testing in eighth grade, which affects the students' ability to earn a diploma, adds undue stress to students who have not yet entered high school.

2. Financial Impact of Keystone Exams

Districts are required to provide supplemental instruction to students who take a Keystone Exam as a graduation requirement and who do not score proficient. Students are to be retested up to two times and then are permitted to take an alternate assessment. As a result, school districts are expected to allocate more resources to supplemental instruction in literature, algebra, and biology at the expense and detriment of other subject areas.

3. Cost of Project-Based Assessments

Of great concern are the costs associated with the Keystone project based assessments. This option is required to be available to students who have not scored proficient on the Keystone Exams after two attempts. The current model for implementation of the Keystone project-based assessments requires that school districts provide human and financial resources such as project administration, student tutoring and project assessment by a Pennsylvania-certified teacher. In the pilot phase, the Keystone project-based assessments represented a real financial hardship for school districts with no evidence that it increased student achievement.

4. Lack of Communication and Clarity

The delayed release of information related to Pennsylvania's accountability system has greatly compromised educators' ability to properly plan for the tests' administration and to share information with stakeholders, while preventing adequate time for curricular content and sequence adjustments. Changes to the uses of the Keystone Exams have been confusing to students and their families. As late as June 2013, districts still did not know how data from the Keystone Exams would be used for accountability measures for public schools in the 2012-13 school year. Schools did not know if the historical Adequate Yearly Progress (AYP) measure would be in place or if the new School Performance Profile would be used. Each contains different factors and different criteria. This situation resulted in all testing being completed in the 2012-13 school year without districts knowing how the Pennsylvania Department of Education (PDE) would hold the schools and their students accountable for the results.

Timely release of information has hampered school districts' ability to plan. As an example, with less than two weeks before the Pennsylvania Department of Education (PDE) was scheduled to release the newly developed School Performance Profiles (SPP), numerous school districts across the state, many of which are high-performing, received a letter from PDE stating that due to students in their district incorrectly coding the purpose of the Keystone Exam, their district's performance profile would be calculated without the data. Further, the SPP's would be released on September 30 as planned with no opportunity to correct the data. Through an email received on Monday, September 23 (one week before the reports are made public) school districts were informed that they will have an opportunity to



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correct their data but only after the SPP's are released. Districts have until September 25 to decide whether to keep the data as is or correct the data and have their performance profiles recalculated in January 2014. Whichever option the district chooses, they will not be able to reverse their decision. In essence, districts are being given two days to decide how to proceed when it is unclear of the ramifications of their decision.

As the Keystone Exams were administered in April 2013, it is extremely perplexing as to why PDE waited until two weeks before the SPP's were to be released to inform superintendents of the problem regarding their district's data. This is just but one example of the miscommunication, misinformation and confusion that has surrounded the implementation and intended use of the Keystone Exams and the new school accountability system. **School Performance Profiles (SPP) should be delayed for release until accuracy is confirmed.**

5. The Fallacy of Failing Public Schools

Contrary to popular rhetoric, the majority of America's public schools are meeting the needs of their students. Public school test scores and graduation rates are the highest they've ever been, and dropout rates are at their lowest point. According to the U.S. Census Bureau, the U.S. high school graduation rate hit an all-time high in 2009 when 85% of U.S. adults over the age of 25 reported having attained a high school diploma as compared to only 34% of the population in the 1950 U.S. census. In addition, according to the College Board, average composite SAT scores for American students have risen almost constantly since 1990. In 2004 the average composite SAT score was 1026 as compared to 1003 in 1994 and 999 in 1984. In 2010, students' mathematics scores were up two points higher than in 2000 and 15 points higher than in 1990.

Also according to the College Board, among the class of 2012, the number of high school graduates taking AP Exams increased to 954,070, (32.4%), up from 904,794 (30.2%) among the class of 2011 and 471,404 (18.0%) in 2002 among the class of 2002. More importantly, the number of high school graduates scoring a 3 or higher also increased by 8% from the class of 2002.

The extreme focus on testing did not take a hold of the American school system until 2001 under the George W. Bush presidency and with the No Child Left Behind legislation. This high-stake testing frenzy was reinforced under the Obama presidency with the Race to the Top grants. It is time for Pennsylvania Legislators to stand up to the politics at both the state and national levels and re-examine the long-lasting consequences of high-stake testing on our students, our teachers, our schools and our society.

It is recognized that there are schools not meeting the needs of their students. Schools must always strive to improve and to enhance their curriculum to ensure they are continually meeting the changing needs of a global, technologically advanced society. However, forcing all schools and all students to be judged by a single assessment on a single day disregards the strong history of academic performance by multiple measures. Public schools are producing better test results and higher graduation rates than at any other time in history.

6. The Inevitable Consequences of High-Stake Testing

High-stake testing has financial, social and educational implications. It is estimated that Pennsylvania will spend \$300 million dollars annually to administer the Keystone Exams, money that would inarguably be better spent in providing teachers with professional development and students with additional resources in the classroom to enable them to succeed.



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Many schools estimate that anywhere from 10 to 20 percent of the school year is now spent preparing for and/or taking high-stake tests, time that would be much better spent in actual instruction especially when students are not enrolled in the course corresponding to the test (i.e., physics students taking the biology Keystone). As a result, more time and money is being spent on testing and many districts have had to reduce their arts, music, history, civics, physical education, sciences, and world language courses to make up the difference.

In addition, many educators fear that an inevitable outcome of tying Keystone Exams to graduation rates is an increased dropout rate that will affect a disproportionate amount of low-income and at-risk students than their peers in more affluent communities whose parents and schools have more resources to focus on remediation.

Call to Action

In conclusion, Pennsylvania school districts welcome rigor, high expectations, and accountability and have willingly and regularly invested time and resources to equip students with the skills they need to be college and career ready. However, the costs associated with the implementation of the Keystone Exams and delayed communication about Pennsylvania's changing accountability system has negatively impacted districts, students, and their families. School districts are concerned that the financial and student impact will become even more pronounced in the future as districts implement supplemental instruction and Keystone project-based assessments.

As a result, we urge the Commission, the Administration, the Pennsylvania Department of Education and the General Assembly to seek additional information and suggested solutions from intermediate units and school districts who see first-hand the unintended consequences of high-stake testing on resources, teachers and students. **We urge the Independent Regulatory Review Commission and the General Assembly not to require Keystone Exams as graduation requirements.** Pennsylvania's educational leaders welcome the opportunity to provide additional measures of the impact of increased testing and changing accountability systems on our schools.

In addition, we know it is especially important that we work closely with our legislators, the Pennsylvania Department of Education and the Corbett Administration during this critical time for Pennsylvania public education. **We need to work together to have a strong accountability system with public commitment in place.**

We appreciate your support for the children of Pennsylvania, and we look forward to additional discussions that will result in a stronger public school system for all students and for the Commonwealth.

Respectfully submitted by a Coalition of Pennsylvania's Public School Superintendents and Intermediate Unit Executive Directors, including:

Bucks County

Dr. Barry Galasso, Executive Director
Bucks County Intermediate Unit

Dr. David Baugh, Superintendent
Bensalem Township School District



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