



Kutztown Area School District

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Katherine D. Metrick, Superintendent

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November 12, 2013

The Honorable Silvan B. Lutkewitte, III
Chairman
Independent Regulatory Review Commission (IRRC)
333 Market Street, 14th Floor
Harrisburg, PA 17101
Email: irrc@irrc.state.pa.us



Re: Final-Form Regulations #6-326 – Academic Standards and Assessment

Dear Chairman Lutkewitte:

The Kutztown Area School District recommends that the Independent Regulatory Review Commission approve final-form Regulation 6-326 related to Chapter 4 Academic Standards and Assessment.

Although this regulation makes some important changes to the Commonwealth's current education standards and assessments, it is not nearly enough, and we hope the Commonwealth will continue to improve the regulations even after this approval. If approved, this final-form regulation will replace the national Common Core State Standards with the Pennsylvania-specific PA Core Standards. It will reduce the number of Keystone Exams from ten to five, eliminate the requirement for the Keystone Exam to count as one-third of a course grade, and eliminate the requirement that every high school senior complete a culminating project. The final-form regulation also prohibits the Pennsylvania Department of Education from implementing a national curriculum and test. As mentioned above, these changes represent an improvement but are not sufficient in refocusing Pennsylvania education on learning. It is our hope that the Commonwealth will continue to analyze the status of education and make meaningful adjustments.

Failure to approve Regulation 6-326 will result in our district having to realign PSSAs and Keystone Exams to the national Common Core State Standards resulting in significant additional costs. In addition, it will reduce instructional time for students, as teachers will be required to administer more assessments to students. This would require districts to revert to all 2010 regulations which were considerably more destructive than those represented by the revisions.

Therefore, Kutztown Area School District supports the Regulation 6-326 and urges IRRC's approval and continued study.

Sincerely,

Katherine D. Metrick
Superintendent