

Kutztown Area School District

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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: <u>irrc@irrc.state.pa.us</u>

2976



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 A. Metrick

Katherine D. Metrick Superintendent

Kutztawn area School District does not discriminate in our educational programs, activities or employment practices, based on race, color, national origin, sex, disability, age, religion, ancestry or any other legally protected classification. This policy is in accordance with state and federal lows, including Title V of the Civil Rights Act of 1964, Title IV of the Educational Amendments of 1972, sections 503 and 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1977, the Age Discrimination Act of 1977, the Americans with Disabilities Act of 1990, and the Pennsylvania Human Relations Act. Information relative to special accommodation, grievance procedure, and the designated responsible official for compliance with Title V, Title V and Section 504 may be obtained by contacting the school district. EOE.