

November 11, 2013

The Honorable Silvan B. Lutkewitte, III  
Chairman  
Independent Regulatory Review Commission (IRRC)  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

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

Dear Chairman Lutkewitte:

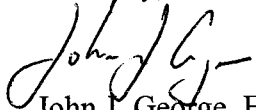
The Berks County Intermediate Unit recommends that the Independent Regulatory Review Commission approve final-form Regulation 6-326 related to Chapter 4 Academic Standards and Assessment.

This regulation makes some important changes to the Commonwealth's current education standards and assessments. If approved, this final-form regulation will replace the national Common Core State Standards with the Pennsylvania-specific PA Core Standards, which were created by Pennsylvania educators. 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, thus allowing resources to be redirected to the administration of project-based assessments and/or supplemental instruction. The final-form regulation also prohibits the Pennsylvania Department of Education from implementing a national curriculum and test.

Failure to approve Regulation 6-326 will result in school districts having to realign PSSAs and Keystone Exams to the national Common Core State Standards resulting in significant costs. In addition, it will reduce instructional time for students, as teachers will be required to administer more assessments to students.

Therefore, the Berks County Intermediate Unit supports Regulation 6-326 and urges IRRC's approval.

Sincerely,

  
John J. George, Ed.D.  
Executive Director

JJG:jk  
cc: Acting Secretary Carolyn C. Dumaresq

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