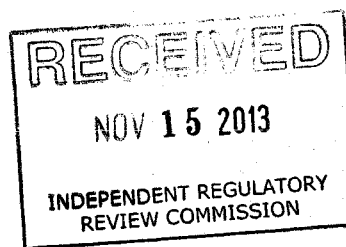


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November 15, 2013

The Honorable Silvan B. Lutkewitte, III
Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101



Re: **Final-Form Regulation #6-326 – Academic Standards and Assessments**

Dear Chairman Lutkewitte:

Our organizations would like to present the following information about Keystone Exams to address some of the concerns you have been hearing.

8 Reasons Pennsylvanians Should Support Keystone Exams

- 1. Keystone Exams are better tests that help ensure students know what they need to know to graduate.** Each year, tens of thousands of Pennsylvania students receive diplomas despite failing to demonstrate proficiency in reading and math on existing state assessments. Many of those students then go on to postsecondary education and have to pay to enroll non-crediting bearing remedial classes, because they're not adequately prepared for the rigors of postsecondary education. Students and families pay twice for these educational programs.
- 2. Keystone Exams are not "high stakes" tests.** A student can re-take a Keystone Exam (or part of an exam) multiple times until proficiency is shown. If a student fails a Keystone Exams after multiple attempts, the student can show proficiency through other options, such as project-based assessments, or receive a waiver from the chief school administrator.
- 3. Students need the guarantee of supplemental instruction to ensure they meet state expectations.** The regulations require that remediation would be given to students who don't pass a Keystone Exam on the first attempt. Schools already should be offering such supplemental instruction to struggling students, otherwise they are knowingly graduating children who have not demonstrated proficiency. Keystone Exams will help better identify struggling students and the area(s) in which they are struggling.
- 4. Local control is preserved and state mandates reduced.** The proposed state regulation that includes Keystone Exams also eliminates some state mandates, including the strategic plan process and the requirement that all students complete a senior project to graduate. Districts can still design their own curriculum and use their own local assessment models if they are shown to be at least as rigorous as the Keystone Exams.

5. **Keystone Exams were created in Pennsylvania for Pennsylvania students.** The exams were developed with input from Pennsylvania educators and field-tested in the commonwealth to ensure they truly measure the commonwealth's state-crafted academic standards.
6. **Keystone Exams are not "more tests."** The exams replaced the 11th grade PSSA, a broad-ranging standardized test that is sometimes taken years after the student has taken a course in the subject(s) being tested.
7. **It's not "teaching to the test" if you "teach to the standards."** Discussion of exams often raises concerns that educators will "teach to the test" and make daily classroom instruction into little more than preparation for tests. The reality is that local school officials design curriculum that is aligned to our academic standards and instruct based on the expectation that educators have agreed are appropriate for children. Aligned assessments, therefore, measure students' knowledge of the standards. "Teaching to the test" is not a valid concern.
8. **Keystone Exams raise the bar for our students.** To help our graduates compete and succeed with students from around the world, we need to raise our expectations and help students achieve to higher levels. Keystone Exams are a critical part of this effort because they are aligned to Pennsylvania's high academic standards (the Pennsylvania Core Standards) and the locally determined curriculum aligned to those standards.

Signed,

A+ Schools

Mission: Readiness - Military Leaders for Kids

PennCAN

Pennsylvania Business Council

Pennsylvania Partnerships for Children

Philadelphia School Partnership

StudentsFirst

Team PA Foundation