

NEIU 19

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Northeastern Educational Intermediate Unit

Clarence R. Lamanna, Ed.D.
Executive Director

2976

November 18, 2013

David Sumner, Executive Director
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101



Attention: David Sumner:

Public school districts in Northeast Pennsylvania are deeply committed to student success. The undersigned superintendents believe this success is driven by high expectations and accountability. At a time of rising demands and diminishing resources, we must express our respectful concern over unfunded mandates and the implementation of Keystone Exams.

The adoption of Keystone exams and mandated remediation protocols as graduation requirements impose costly burdens with questionable benefits for students. For example, a project-based assessment is required for students unable to achieve a proficient score. While management of these projects will require time and expense, we are aware of no evidence that the projects will increase student achievement. As educators, we recognize the most effective way to measure student achievement is using multiple measures over time. The Department of Education's testing regimen requires our students to sit hour after hour day after day taking costly standardized tests. Utilizing this measure alone as the gateway to a diploma is problematic. We are particularly concerned with the potential disproportionate impact this regulation will have on at-risk students in resource deprived school districts.

Our school districts are battling to preserve student services while under an assault of fiscal hardships. We have simultaneously experienced a substantial increase in reporting demands often coupled with a lack of clarity. Costly mandates have drained our resources and limited our flexibility to develop local solutions best suited to the unique needs of our local populations.

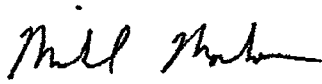
We recommend that the Pennsylvania Department of Education suspend its effort to require Keystone Exams as graduation requirements. We also look forward to working with our legislators and policy makers to develop sustainable accountability measures for our schools and students.

Finally, we thank you for your efforts on behalf of our communities.

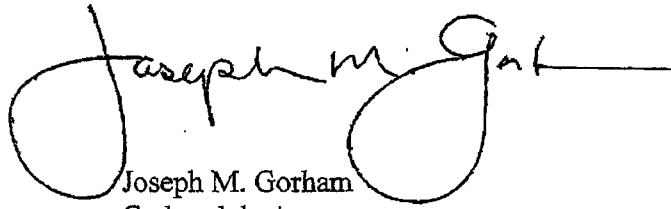
Respectfully submitted by Northeast superintendents including: (see attached signature page)

cc: The Honorable Andrew Dinniman
cc: The Honorable John Blake
cc: The Honorable Lisa Baker

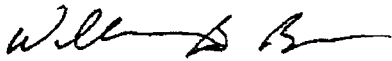
Signatures from the School Districts within NEIU 19:



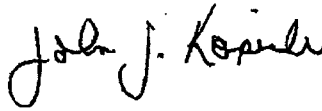
Dr. Michael Mahon
Abington Heights



Joseph M. Gorham
Carbondale Area



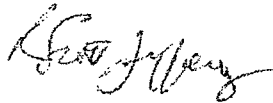
Dr. William B. Bush
Elk Lake



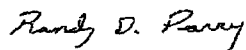
John J. Kopicki
Forest City Regional



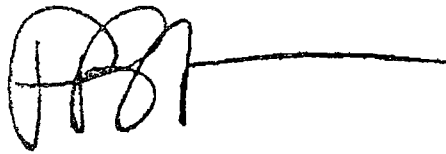
Matthew Rakauskas
Lackawanna Trail



R. Scott Jeffery
Lakeland



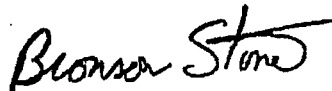
Randy Parry
Mid Valley



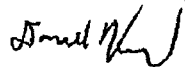
Paul Brennan
Riverside



William King
Scranton City



Bronson Stone
Susquehanna Community



Donald Kanavy
Valley View