Dear irrc@irrc.state.pa.us,

The signatures of Superintendents of Schools provided at the end of this document are an official notification that we are united in our thoughts about the sincere belief that all students should be required to think critically and apply their learning and skills in realistic and meaningful ways and that all educators should be held accountable for the learning that takes place in their classrooms and their schools.

However, the success in a test guarantee is not a guarantee at all. In fact there are major challenges and concerns with the current implementation strategy of the Keystone Exams and Pennsylvania's school accountability system. We urge our legislators to reexamine the proposals requiring Keystone Exams for students' graduation, expanding the required number of Keystone Exams from three to five, and to using a single, high-stake test to measure individual student learning and achievement.

The following information will:

Describe the concerns public school districts have with the implementation of the Keystone Exams; Detail the challenges caused by increased testing, changing accountability systems and poor communication; and

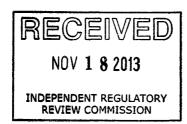
Call upon our state representatives to re-evaluate the need for high-stake testing and how the results are used to evaluate our students, our teachers and our schools.

1. Impact of the Keystone Exams

The Keystone Exams, originally designed as end-of-course exams, were re-purposed in 2012-13 to be an accountability measure to replace the 11th grade PSSAs. This change in direction increased the hours of testing time for many students. For example, high school students were required to take Keystone Exams in biology, literature, and algebra (often years after students had taken the courses). This type of testing (and re-testing for students who were not proficient) created unanticipated hours of planning for test preparation, administration, remediation and review.

The increased testing impacted school district staff, students and their families. For example, students spend up to three to four weeks taking the Keystone Exams, AP exams, and their schools' final exams. In addition, students also take the PSAT, SAT and ACT college entrance exams in the spring. This overlap of the Keystone Exams, AP testing and college board exams places an undue burden on students.

High school students are not the only students affected by multiple testing. Eighth graders are also negatively impacted. Since many students take algebra in the eighth grade, students must take the PSSA and the Algebra I Keystone Exam at the same time. High stakes testing in eighth grade, which affects the students' ability to earn a diploma, adds undue stress to students who have not yet entered high school.



2. Financial Impact of Keystone Exams

Districts are required to provide supplemental instruction to students who take a Keystone Exam as a graduation requirement and who do not score proficient. Students are to be retested up to two times and then are permitted to take an alternate assessment. As a result, school districts are expected to allocate more resources to supplemental instruction in literature, algebra, and biology at the expense and detriment of other subject areas.

3. Cost of Project-Based Assessments

Of great concern are the costs associated with the Keystone project based assessments. This option is required to be available to students who have not scored proficient on the Keystone Exams after two attempts. The current model for implementation of the Keystone project-based assessments requires that school districts provide human and financial resources such as project administration, student tutoring and project assessment by a Pennsylvania-certified teacher. In the pilot phase, the Keystone project-based assessments represented a real financial hardship for school districts with no evidence that it increased student achievement.

4. The Fallacy of Failing Public Schools

Contrary to popular rhetoric, the majority of America's public schools are meeting the needs of their students. Public school test scores and graduation rates are the highest they've ever been, and dropout rates are at their lowest point. According to the U.S. Census Bureau, the U.S. high school graduation rate hit an all-time high in 2009 when 85% of U.S. adults over the age of 25 reported having attained a high school diploma as compared to only 34% of the population in the 1950 U.S. census. In addition, according to the College Board, average composite SAT scores for American students have risen almost constantly since 1990. In 2004 the average composite SAT score was 1026 as compared to 1003 in 1994 and 999 in 1984. In 2010, students' mathematics scores were up two points higher than in 2000 and 15 points higher than in 1990.

Also according to the College Board, among the class of 2012, the number of high school graduates taking AP Exams increased to 954,070, (32.4%), up from 904,794 (30.2%) among the class of 2011 and 471,404 (18.0%) in 2002 among the class of 2002. More importantly, the number of high school graduates scoring a 3 or higher also increased by 8% from the class of 2002.

The extreme focus on testing did not take a hold of the American school system until 2001 under the George W. Bush presidency and with the No Child Left Behind legislation. This high-stake testing frenzy was reinforced under the Obama presidency with the Race to the Top grants. It is time for Pennsylvania Legislators to stand up to the politics at both the state and national levels and reexamine the long-lasting consequences of high-stake testing on our students, our teachers, our schools and our society.

It is recognized that there are schools not meeting the needs of their students. Schools must always strive to improve and to enhance their curriculum to ensure they are continually meeting the changing needs of a global, technologically advanced society. However, forcing all schools and all students to be judged by a single assessment on a single day disregards the strong history of academic performance by multiple measures. Public schools are producing better test results and higher graduation rates than at any other time in history.

5. The Inevitable Consequences of High-Stake Testing

High-stake testing has financial, social and educational implications. It is estimated that Pennsylvania will spend \$300 million dollars annually to administer the Keystone Exams, money that would inarguably be better spent in providing teachers with professional development and students with additional resources in the classroom to enable them to succeed.

Many schools estimate that anywhere from 10 to 20 percent of the school year is now spent preparing for and/or taking high-stake tests, time that would be much better spent in actual instruction especially when students are not enrolled in the course corresponding to the test (i.e., physics students taking the biology Keystone). As a result, more time and money is being spent on testing and many districts have had to reduce their arts, music, history, civics, physical education, sciences, and world language courses to make up the difference.

In addition, many educators fear that an inevitable outcome of tying Keystone Exams to graduation rates is an increased dropout rate that will affect a disproportionate amount of low-income and at-risk students than their peers in more affluent communities whose parents and schools have more resources to focus on remediation.

6. What the experts are saying

Jay McTighe an educational writer and world-wide educational consultant on Common Core Standards recently presented a program on Teacher Effectiveness, Learning Communities and curriculum for the Rigor of Common Core.

During that presentation Jay McTighe specifically stated that the goal of learning, even in PA Common Core learning should be based upon long-term transfer goals and the final score is NOT final. He stated the focus of education should be continual and ongoing practice. He went on to say that No high stakes test or test associated to place pressure upon students will achieve college or career ready students because the content needed for long term transfer is simply too much to recite on a test. He stated the key to student evaluation and teacher effectiveness are found in listening and speaking activities that are really the key to success.

Jay McTighe stated that PA Common Core curriculum should simply be viewed as a building code not the actual blueprints for a building. Meaning that Pa Common Core should be view only as the overall code not specific curriculum that must be taught in the thousands of PA classrooms.

Call for Action

In conclusion, Pennsylvania school districts welcome rigor, high expectations, and accountability and have willingly and regularly invested time and resources to equip students with the skills they need to be college and career ready. However, the costs associated with the implementation of the Keystone Exams and delayed communication about Pennsylvania's changing accountability system has negatively impacted districts, students, and their families. School districts are concerned that the financial and student impact will become even more pronounced in the future as districts implement supplemental instruction and Keystone project-based assessments.

As a result, we urge the Administration, the Pennsylvania Department of Education and the General Assembly to seek additional information and suggested solutions from intermediate units and school

districts who see first-hand the unintended consequences of high-stake testing on resources, teachers and students. I urge the Pennsylvania General Assembly not to require Keystone Exams as graduation requirements. Pennsylvania's educational leaders welcome the opportunity to provide additional measures of the impact of increased testing and changing accountability systems on our schools.

There are other options I have for a so called "Keystone Diploma" that I would be willing to discuss with you at a later time. I appreciate your support for the children of Pennsylvania, and we look forward to additional discussions that will result in a stronger public school system for all students and for the Commonwealth.

Respectfully submitted by:

Dr. Don Bell, Superintendent of Schools Northern Lebanon School District