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The Honorable Silvan B. Lutkewitte, III
Chairman
Independent Regulatory Review Commission (IRRC)
333 Market Street, 14th Floor
Harrisburg, PA 17101
Email: irrc@irrc.state.pa.us

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

Dear Chairman Lutkewitte,

I am writing to express PennCAN's support for the final-form regulation 6-326 related to academic standards and assessments. I strongly urge the Independent Regulatory Review Commission's approval.

The Pennsylvania Core Standards and related assessments are rigorous, appropriate and will help ensure that all Pennsylvania students are well prepared for college and careers upon graduating from Pennsylvania's public schools. The improved standards are unique to Pennsylvania and reflect the input and collaboration of numerous parents, teachers, administrators and legislators at the state and local level. These updated regulations reflect the lessons learned by the Common Core State Standards initiative and address key concerns expressed by citizens of Pennsylvania.

Pennsylvania students should be prepared to succeed after graduation

The College Board sets a composite SAT score of 1550¹ (out of a possible 2400) as the benchmark for college and career readiness. In 2012, however, the average composite score for Pennsylvania students who took the SAT was 1472—well below that benchmark.² That so many Pennsylvania students are graduating or leaving school unprepared for higher education or the workplace is, frankly, unacceptable.

This lack of readiness is due in part to the previous academic standards, which offered students inadequate benchmarks for success beyond high school. According to an in-depth 50-state analysis conducted by the Thomas B. Fordham Institute, the standards that were in place prior to Pennsylvania's adoption of the Common Core State Standards in 2010 were vague and repetitive, lacked rigor and essential content and did not lay out a clear progression of skills and knowledge from grade to grade.³ In contrast, the

¹ "SAT College and Career Readiness Benchmark," College Board, accessed September 5, 2013, <http://press.collegeboard.org/sat/sat-college-and-career-readiness-benchmark>.

² "2012 College-Bound Seniors State Profile Report, Pennsylvania," College Board, accessed September 5, 2013, http://media.collegeboard.com/digitalServices/pdf/research/PA_12_03_03_01.pdf, page 1.

³ "The State of State Standards—And the Common Core—In 2010," Thomas B. Fordham Institute, accessed September 5, 2013.

Common Core State Standards, which served as the basis for the newly proposed Pennsylvania Core Standards, were highly rated in each of these areas.

This regulation also reduces the number of Keystone Exams students are required to take from ten to five. Approval will reduce testing time for students and cut in half the number of subjects in which school districts are required to provide remediation and administer project-based assessments.

Pennsylvania students deserve access to an education based on high standards that prepare them for success in college or the workplace. Adoption of the Pennsylvania Core Standards is an important step towards making this vision of great schools for all a reality.

The standards and related Keystone assessments reflect what Pennsylvanians want and need for their children

The Pennsylvania Core Standards benefit from the research and expertise gathered across the country during the drafting of the Common Core State Standards as well as input from the community here in Pennsylvania.

Using the former PA Academic Standards and the rigorous Common Core State Standards as a base, along with feedback from stakeholders across the state, new refinements make these standards *unique to Pennsylvania*. The Pennsylvania Core Standards, for example, recognize the importance of early childhood education by including math and English-Language Arts standards for pre-kindergarten, while the Common Core State Standards don't begin until kindergarten. Input and comments from teachers, parents, school administrators, business leaders and many others were incorporated into these standards, creating the best possible framework for an effective pre-K-12 education in Pennsylvania.⁴

It is also important to note that adopting the Pennsylvania Core Standards will not establish a common statewide curriculum. The regulations stress the importance of flexibility for local school entities to craft the curriculum and materials most appropriate for their students' unique needs.⁵ In fact, the regulations explicitly forbid mandating a statewide curriculum or reading lists.⁶

Additionally, the standards represent a state-level effort to ensure the best education possible for the students in our state. By adopting these revisions, Pennsylvania would join other states in customizing the standards to their unique needs. For example, in

http://edexcellencemedia.net/publications/2010/201007_state_education_standards_common_standards/Pennsylvania.pdf.

⁴ Crosswalks prepared by the Pennsylvania Department of Education comparing the PA Academic Standards, the Common Core State Standards and the new draft standards demonstrate numerous instances where the new standards were informed by and expand upon both the Common Core State Standards and the prior PA Academic Standards. For more information, see "Pennsylvania Common Core Standards Crosswalks," Pennsylvania Department of Education, accessed September 5, 2013,

<http://www.pdesas.org/standard/CommonCore>.

⁵ "Chapter 4 Final-Form (Proposed Revisions)," Pennsylvania Department of Education, accessed September 5, 2013,

http://www.portal.state.pa.us/portal/server.pt/community/current_initiatives/19720/chapter_4/1120975, page 6.

⁶ "Chapter 4 Final-Form (Proposed Revisions)," page 9.

Minnesota, only the standards for English-Language Arts were adopted, because the state was confident that its math standards were already sufficiently rigorous.

The standards are unique to Pennsylvania, and the proposed regulations also reflect Pennsylvania's decision to use its own state-created assessments. The proposed revisions clearly state that Pennsylvania "shall not be a governing state in any consortium for the development of a national assessment for the purpose of utilization as part of the state assessment system."⁷ From beginning to end, the standards and assessments reflect what both Pennsylvanians and national experts agree will produce the best outcomes for our students.

Private data will remain protected

Fortunately, the Pennsylvania Core Standards and related assessments can be adopted without breaching personal data privacy. To ensure that data privacy will remain protected, the regulations clearly state, "the [Pennsylvania Department of Education] shall not expand the collection of student data, and, in accordance with the Family Educational Rights and Privacy Act (20 U.S.C. § 1232g (relating to family educational and privacy rights)), shall not collect personal family data due to the implementation of Pennsylvania Core Standards."

Conclusion

Continuing to delay the full implementation of high-quality rigorous standards will only ensure that too many Pennsylvania students continue to leave high school unprepared for the demands of succeeding in work or college. The Pennsylvania Core Standards and the related assessments are an appropriate, state-vetted solution that ensures all Pennsylvania children are receiving the education they need and deserve. PennCAN strongly supports the regulations and urge the IRRC to vote to approve them.

Sincerely,

Jonathan Cetel
Executive Director, PennCAN

PennCAN: The Pennsylvania Campaign for Achievement Now is a nonprofit education reform advocacy organization building a movement of Pennsylvanians with the political will to enact smart public policies so that every Pennsylvania child has access to a great public school. PennCAN is a branch of 50CAN: The 50-State Campaign for Achievement Now, a national network of state-level advocacy groups fighting to enact research-based education reforms that will give every child in their state access to a great school. In addition to Pennsylvania, 50CAN operates campaigns in Minnesota, Maryland, New Jersey, New York, North Carolina and Rhode Island.

⁷ "Chapter 4 Final-Form (Proposed Revisions)," page 42.