



## UPPER DARBY SCHOOL DISTRICT

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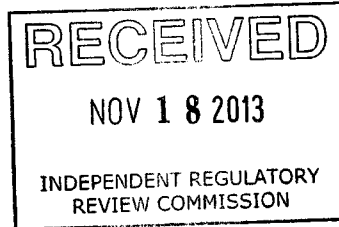
### Administrative Offices

**Edward J. Smith**

Director of Business Management  
and Board Secretary

2976

November 15, 2013



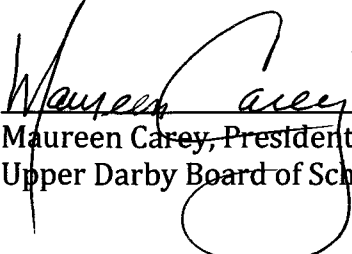
Chairman Silvan B. Lutkewitte  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

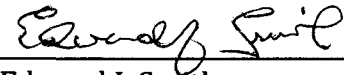
Dear Chairman Lutkewitte and members of the IRRC,

Thank you for the opportunity to present written comments regarding Regulation #6-326: Academic Standards and Assessment, which amends existing regulations to reflect Pennsylvania's Common Core Standards in English language arts; address test security concerns; and require students to demonstrate proficiency on the Keystone Exams in order to graduate from high school. Specifically, the following comments are in regards to the impact of implementing the Keystone Exams as proposed in the Chapter 4 regulations.

Enclosed please find a Resolution by the Board of Directors of Upper Darby School District requesting the Independent Regulatory Review Commission (IRRC) to remove language requiring the unfunded mandate of passing Keystone graduation exams from the Pennsylvania School Code Chapter 4 revisions. We ask your support in petitioning the IRRC.

Sincerely,

  
Maureen Carey, President  
Upper Darby Board of School Directors

  
Edward J. Smith  
Board Secretary

## UPPER DARBY SCHOOL DISTRICT

WHEREAS, the Upper Darby School District is committed to preparing all students for success in college and the workplace by providing a comprehensive and challenging educational program which encourages all learners in a safe environment to respect others, value education, and appreciate and contribute to their community as confident, independent thinkers; and

WHEREAS, Upper Darby School District students have regularly met and/or exceeded state standards on a multitude of end of course district exams, differentiated projects such as portfolios and/or oral presentations, tactile learning opportunities, as well as a variety of other assessments, demonstrating that the Upper Darby Curriculum has met state standards, but those students have not demonstrated proficiency on one or more Keystone Exam; and

WHEREAS, the Upper Darby School District recognizes the PA Core Standards and all related assessments and will continue to use data from Keystone end of course exams along with local assessments to allow the District multiple data points to provide the most appropriate remediation for students; and

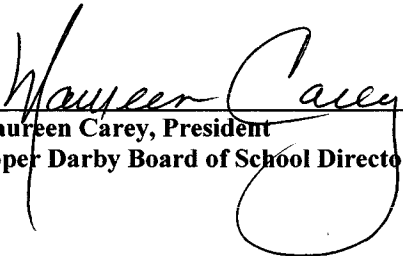
WHEREAS, basing educational decisions on one data point and imperfect information has the potential to negatively impact all stakeholders in the Upper Darby School Community whereby undue stress and further diminishing of instructional time; and

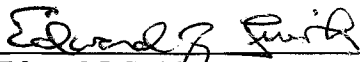
WHEREAS, the unfunded mandate of the Keystone end of course exam as a graduation requirement will lead to further financial constraints to an already limited financial organization who has had to make significant cuts in personnel and will be required to make additional changes in programming as a result of increased remediation courses, yet these unfunded mandates will lead to increased expenditures with no significant proof of effectiveness; and

WHEREAS, the Keystone Exams graduation requirement will necessitate reductions in other programs in order to offset the unfunded mandate for students in need of remediation and a project based assessment that will limit a student's ability to partake in a *comprehensive and challenging educational program which encourages all learners in a safe environment to respect others, value education, and appreciate and contribute to their community as confident, independent thinkers* as outlined in our Board approved Mission Statement.

NOW THEREFORE, BE IT RESOLVED that the Board of School Directors of the Upper Darby Township School District opposes the State Board of Education approved final-form revisions of Chapter 4 (Academic Standards and Assessment) and any other regulations or legislation the usurp the authority of local school districts to determine whether their students have earned high school diplomas. The District seeks support from other school boards, local legislators and members of the Senate and House Education Committees in petitioning the Independent Regulatory Review Commission to bifurcate approval of Chapter 4, approving language pursuant to PA Core Standards and removing language requiring the unfunded mandate of passing end of course graduation exams.

This resolution will be shared with the Pennsylvania School Board Association for dissemination to Commonwealth School Districts, Intermediate Units, local legislator and members of the Senate and House Education Committees, and the Independent Regulatory Review Commission.

  
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Maureen Carey, President  
Upper Darby Board of School Directors

  
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Edward J. Smith  
Board Secretary

November 15, 2013