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Independent Regulatory Review Commission
Mr. David Sumner
333 Market Street, 14th Floor
Harrisburg, PA 17101
Email: dsumner@irrc.state.pa.us



Dear Mr. Sumner,

I am writing as a concerned school board director from the West Chester Area School District. I wish to express my strong opposition to the Keystone Exam graduation requirement in Chapter 4.

Here are two of the recent experiences in our district with the Keystone exams and how they are going to impact our students and our budget. At the beginning of November our high school teachers were scheduled to take the 45 minute online test required for teachers to become certified to administer the Keystone exams. They had already completed the online course given by the Department of Education on how to give the tests. At 2:45 the teachers went online. The feed from the state failed and could not be re-connected. The Keystone tests are being given December 2 and 3, 2013. The teachers are "working to contract" at this time, and the next time they have to attend a faculty meeting is December 4th. That experience is an annoyance and a waste of time. What follows is much more expensive.

At our last board meeting we were given a proposal from our district administration to hire three fulltime Biology Specialists. Like a reading or math specialist, this would be a support person (not a classroom teacher) who would specifically be assigned to help teachers do a better job of preparing students for the Keystone biology tests, for tutoring students who failed the tests, who would work with students on projects after they failed the tests, and who would give the tests. The cost of these three positions was \$252,000. Why that amount? I quote from the proposal:

"The district -wide cost minimum estimate for providing the supplemental instruction before or after school is \$77,782.00. Without the availability of this full-time position in each high school (West Chester has three), we would incur this estimated \$77,782.00 expense in fulfilling this mandate."

The proposal continues: "The proposed Chapter 4 regulations also mandate that students are eligible to take a project-based assessment in lieu of additional Keystone Exams after at least two non-proficient attempts (one non-proficient attempt for students with an IEP).

This process requires both a tutor and a test administrator, both for extensive hours and thus significant dollars (this cost is difficult to estimate due to number of students involved and length of time for each student to complete the Project-based assessment; estimated cost is \$103,710.00) The Biology Specialist would be able to fulfill both roles, thus eliminating the need to pay this additional \$103,710. "

All the time it took to try to understand how much the costs involved with this mandate and how to best spend taxpayer dollars is a response to the refusal of the Department of Education to supply us with realistic numbers of the hours these things will take and the costs that might be involved. Not one administrator in our district has this extra time to spend on figuring how best to work with the requirements of preparing our students to take and tutor and retest them if they fail.

I spent my career as a teacher, an administrator and a supervisor. My deep concern with the Keystones is for the students who will not be able to pass these tests. And for students all across Pennsylvania who will never pass these tests and will not graduate. The Keystones are a certain and deplorable pathway to failure for students with IEPs, students with fewer resources and students in schools whose teachers will be labeled as failures. It is altogether a negative, a punitive and a hopeless attempt on your part to have our students be "college and career ready." You have married two entities that were never meant to be married: The Common Core Standards and graduation requirement called Keystones. You have threatened school districts that if the three Keystones do not pass on the 21st, we will revert to the regulations that dictate we give 10 exams which will each count one-third of the student's grade. NEITHER OPTION IS ACCEPTABLE. The entire process needs to be re-thought, redesigned and overhauled.

Listen to the educators who have written to you. Dr. Elliott Seif's paper on why these exams should not be used for graduation is right on target. I likewise support his proposal that the tests be used as formative assessments so that the results can be used to inform instruction. I also support his proposal that the Keystones be used to award a Keystone Honors Academic Diploma. I too would like to see the graduation project reinstated in Chapter 4. We need to be encouraging our students, not punishing them.

Sincerely,

Susan Tiernan
West Chester Area School Board Member

C: Senator Andrew Dinniman
Representative Dan Truitt
Senator Dominick Pileggi
Representative Chris Ross