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November 18, 2013

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



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

## Dear Chairman Lukewitte:

On behalf of the 17 superintendents served by the Central Susquehanna Intermediate Unit (CSIU), I write to urge you and your fellow commission members to support approval of final form regulations 6-326, also known as Chapter 4, regarding Academic Standards and Assessments.

The PA Department of Education, State Board of Education and House and Senate Education Committees have spent significant time and effort to fully engage constituents in assessing the intent, substance and fiscal implications of these measures as required by the regulatory process. The regulations have been submitted to the IRRC after due diligence by all parties involved to ensure language that accommodates a variety of interests.

The new version of these regulations addresses a number of critical issues for school districts:

- Eliminates the mandated graduation project requirement, thereby reducing a burden on school district personnel that is duplicative of teacher-initiated project-based assessment;
- Reduces the number of high school Keystone Exams from a potential of ten to a potential of five tests, thereby allowing greater flexibility on the part of the local district to establish curriculum scope and sequence and manage time;
- Modifies the Keystone Exam requirement so that current ninth graders will be the first class subject to new graduation requirements regarding these exams rather than current high school juniors, for which adequate preparation time for success on the exams was far more limited;
- Replaces the Common Core State Standards with the PA Core Standards, which ensures the
  ability of our Commonwealth, rather than a national group, to govern future additions,
  deletions and modifications to the formal expectations for student learning.

Our district leaders support the new regulations as written, and will take up the specific concerns we may have about their implementation directly with the Department of Education, State Board and/or Senate and House Education Committee members.

Once again, our region urges you to approve the regulations before you and appreciates your consideration of our comments herein.

Sincerely,

Dr. Kevin Singer Executive Director