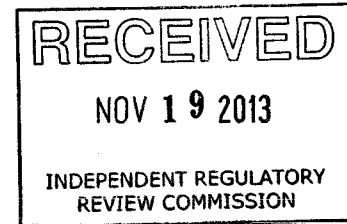


**Jeffrey E. Piccola**  
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**Lewisberry, PA 17339**

November 21, 2013

Independent Regulatory Review Commission  
333 Market Street  
Harrisburg, PA 17101



RE: No. 2976 State Board of Education # 6-326, Academic Standards & Assessments

To the Commission:

I write asking this letter be included in the public comment record on the above proposed regulatory changes. I strongly urge approval of these regulations. While these modest regulatory changes have drawn some controversy, most of that controversy has been generated by out of state sources and relates to what may be happening in other states, not Pennsylvania.

As a member of the Senate Education Committee from 1995 to 2012, and Chairman of that committee from 2009 to 2012, I have been intimately involved in Chapter 4 Regulations since their inception. Governor Tom Ridge in 1996 decided that for the first time in Pennsylvania history taxpayers should have the right to know what they are getting for the billions of dollars they are spending on public education. He created a Standards Commission to recommend academic standards to be adopted by the State Board of Education. I served on that commission representing the Senate of Pennsylvania. He developed assessments to measure student achievement at certain stages of their academic careers. He also achieved passage of the Educational Empowerment Act, which targeted the lowest performing school districts for special remediation and possible sanctions to raise the performance of the students in those districts. I was a major sponsor of that legislation.

While there is still much room for improvement, no one can dispute that the focus on academic achievement since the late 1990s has resulted in students, teachers and administrators performing at a higher level in the primary mission of public education. Over these years, it has been necessary to make periodic changes to the standards and the assessments to upgrade them and keep them relevant. The changes before the IRRC now are the most recent updates reflecting modest changes to the regulations and they fall into two broad categories – Pennsylvania Core Standards and the Keystone Exams.

First as to the Keystone Exams, it must be said that from 1996 until 2010, the assessments that have been in place (PSSAs) made teachers, administrators, schools and school districts more accountable. However, this accountability did not extend to the students who took the tests. By the time students reached 8<sup>th</sup> grade, if not earlier, they understood these tests counted nothing for them and there was no strong incentive to perform well when taking them. From the very beginning of standards in Pennsylvania, it was believed by many that at some point in time, proficiency in the basic subjects should be required for students to advance and graduate with a Pennsylvania high school diploma. Credit goes to Governor Ed Rendell who originally proposed Graduation Competency Assessments (GSAs), which later became the Keystone Exams adopted by the State Board of Education in 2010. The effort to create these exams was a bipartisan initiative led by Governor Rendell, myself, Senator Andrew Dinniman and Joe Torsella,

former Chair of the State Board of Education. Since their initial adoption, the need for modification has occurred because of both fiscal constraints and other issues that have been identified, which is the purpose of the Chapter 4 regulations in front of IRRC now.

Rather than cost additional tax dollars, approval and use of these exams will be a cost savings in the long run. Students, for the first time, will have a stake in the exams (graduation) and motivation to do well. By replacing the 11<sup>th</sup> grade PSSAs, they will potentially reduce the amount of testing required by administering them in proximity to the appropriate course even as a final exam. More importantly, students who graduate are more likely to be proficient in the basic skills of reading, writing and mathematics. Such students are less likely to be dependent on the welfare system or involved in the criminal justice system. One of my favorite comic strips, *Calvin and Hobbes* by Bill Watterson, summed it up in a recent cartoon which I have attached. After trying to get his teacher to sign a contract agreeing to compensate him for income loss if he gets a poor 1<sup>st</sup> grade education, Calvin in the last panel says, "By golly, somebody ought to pay me if I don't learn anything." What we hope Calvin does not learn is that the taxpayer **do** pay for academic failure.

The Pennsylvania Core Standards, the second category in the Chapter 4 regulations, are simply another update of our original standards that were first adopted in the 1990s. Part (not all) of the current updated regulations are based on the "Common Core" model standards initiated by the National Governors' Association (not the Federal government) and the chief state school officers in each state (in Pennsylvania our chief state school officer is the Secretary of Education).

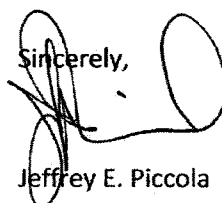
Pennsylvania was one of the first states to adopt academic standards, but soon most other states followed suit. Of course different states had different standards and different approaches to them. After several years some of the nation's governors and chief state school officers thought it would be helpful to have the states adopt national standards because of the transient nature of our citizenry, especially the military. From this effort came the model standards referred to as Common Core.

When first proposed in Pennsylvania, I was a member of the State Board of Education. My only concern at the time was that these new model standards may "dumb down" Pennsylvania's high academic expectations. However, after the completion of a study by the University of Pittsburgh and after convening Pennsylvania educators across the state to review the standards, it was confirmed that the Pennsylvania Core Standards are either as rigorous – or more rigorous than our existing standards. For that reason I have supported them.

Academic standards and testing regulations and changes to them have been debated inside and outside the legislative and executive branches for about two decades. In every instance, they have passed the test. As Pennsylvanians approaches spending \$27 billion on public education every year, they deserve to know they are getting what they are paying for – the education of our kids to the top of the curriculum. These regulatory changes will assure that and give every Pennsylvania student a better chance at the academic success required to be job and career ready.

Thank you for taking these comments into consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey E. Piccola", written over a horizontal line.

Jeffrey E. Piccola

