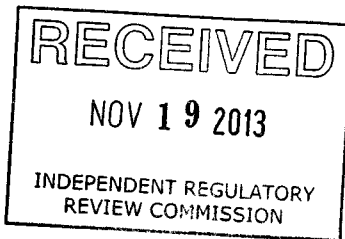


2976



November 18, 2013



400 North Third Street
P.O. Box 1724
Harrisburg, PA 17105-1724
(717) 255-7000 • (800) 944-PSEA (7732)
Fax: (717) 255-7128
www.psea.org
Michael J. Crossey, *President*
W. Gerard Oleksiak, *Vice President*
Dolores M. McCracken, *Treasurer*
John F. Springer, *Executive Director*

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 Regulations #6-326 - Academic Standards and Assessment

Dear Chairman Lutkewitte:

I write to inform you of the Pennsylvania State Education Association's (PSEA) concerns with provisions of the proposed changes to the Keystone Exams contained in the final-form revisions to Chapter 4 that are currently before the Commission.

Specifically, PSEA is concerned that these regulations move the Keystone Exams from being a portion of a student's grade to a high stakes exit exam. If these regulations go into effect, students will have to score Proficient or Advanced on potentially five different Keystone Exams in order to graduate from high school. While there are alternative pathways to graduation provided, including the ability for district superintendents to waive the Keystone Exam requirement, these new regulations would require remediation for students who score Basic or Below Basic. This remediation is required because the student did not meet the cut score on a standardized state test *regardless of how well he or she performed in class*. The cut scores for Keystone Exams were set without the knowledge that they would be used as a graduation requirement. This will significantly increase school district costs. These new costs are seemingly being ignored by the State Board of Education.

Conservative estimates indicate that Keystone Exam remediation could increase school districts' costs by hundreds of millions of dollars. At the same time our school districts are still contending with the loss of nearly \$1 billion in resources in just the last few budget cycles. Most are struggling just to maintain the programs they are already offering, programs as basic and necessary as kindergarten, art, music, and sports. What further programs and services will be cut in order to cover the costs for remediation to the test? Where will districts find time in their already crowded days to do all of this? Neither of these questions has been adequately answered by the proponents of these regulations.

These high stakes exit exams are not in the best educational interests of Pennsylvania's students, nor are they in the best financial interests of school districts and taxpayers.

Sincerely,

Michael J. Crossey

