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November 20, 2013

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

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IRRC

RE: Final Form Regulation #6-326 – Academic Standards and Assessments

Dear Chairman Lutkewitte,

Along with my undersigned colleagues, I write in opposition to the proposed regulation #6-326.

For the purposes of this testimony, I will deal only with some of the most egregious problems with these regulations.

Section 4.2 states that the establishment of these standards and assessments are applicable only to the public schools of the Commonwealth. However, the definitions of Section 4.3 specify that the Keystone Exams will be used as part of the determination of a student's eligibility for high school graduation. The proposed regulations do not include an alternate mechanism for non-public school students to meet Pennsylvania's graduation requirements without taking the Keystone exams. How does this omission affect the ability of non-public schools to confer a Pennsylvania diploma on their students?

Section 4.3 defines State Assessment as a valid and reliable measurement of student performance and specifically includes the Keystone exams.

The term "valid and reliable" is an accepted standard in psychometric testing. To be considered valid, a test must measure as exactly as possible the item that is being evaluated. Testing conditions must be controlled so every test subject is performing an identical task under identical conditions. Standards for success must be generally accepted in the area being evaluated. For an assessment to be considered reliable, the same results must be obtained from every administration of the test.

The Keystone exams meet neither of these standards.

Let us begin with the definitions given by the Department of Education for performance levels.

Illustration 1 describes the four possible performance levels in the Keystone Exams. Performance levels of Proficient and Advanced are the passing levels. Advanced performance is defined as “superior academic performance indicating an in-depth understanding” and Proficient is described as “satisfactory academic performance indicating a solid understanding.” No quantifiable information is provided, making the practical application of these descriptions totally subjective.

**KEYSTONE EXAMS ITEMS**

Common items within a content area are administered to all eligible students regardless of the exam form they are assigned. Only the common items are used in determining students' scores and their corresponding performance levels. This practice ensures all students are evaluated using the same sets of items.

Field Test items vary between forms. These items are included only as a means for gathering statistical information about an item that might be used in a future assessment. Field Test items are not included in the results of students, schools, or the district.

**KEYSTONE EXAMS SCORES**

The Keystone Exam score is a scale score computed from the number of points a student receives on the exam (i.e., raw score). For every possible raw score on an exam form, there is a corresponding scale score. Most state testing programs use scale scores for reporting purposes. A given scale score has the same interpretation regardless of the length or difficulty of the exam. For example, a scale score of 1300 always implies the same level of student performance and always falls in the same performance level. The student's Keystone Exam score is used to place the student in the appropriate performance level. The items on the Keystone Exams change with each administration, but they continue to measure the same Assessment Anchors and Eligible Content.

Please note that percentages in the following tables may not add up to 100% due to rounding.

**KEYSTONE EXAMS PERFORMANCE LEVELS**

- Advanced:** Superior academic performance indicating an in-depth understanding and exemplary display of the skills included in the Keystone Exams Assessment Anchors and Eligible Content.
- Proficient:** Satisfactory academic performance indicating a solid understanding and adequate display of the skills included in the Keystone Exams Assessment Anchors and Eligible Content.
- Basic:** Marginal academic performance indicating work approaching, but not yet reaching, satisfactory performance. Performance indicates a partial understanding and limited display of the skills included in the Keystone Exams Assessment Anchors and Eligible Content. The student may need additional instructional opportunities and/or increased student academic commitment to achieve the Proficient level.
- Below Basic:** Inadequate academic performance indicating little understanding and minimal display of the skills included in the Keystone Exams Assessment Anchors and Eligible Content. There is a major need for additional instructional opportunities and/or increased student academic commitment to achieve the Proficient level.

**KEYSTONE EXAMS ASSESSMENT ANCHORS AND ELIGIBLE CONTENT**

The Keystone Exams Assessment Anchors and Eligible Content are designed to clarify the Academic Standards that may be assessed in the Keystone Exams. An Assessment Anchor is reported only if five or more possible points come from items aligned with the Assessment Anchor. Results based on fewer than five items are not considered statistically reliable.

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Algebra I

pennsylvania  
DEPARTMENT OF EDUCATION

Page 2

Illustration 1

A further analysis of how these undefined descriptions are applied to the actual scoring is revealed by examining the actual results of the keystones. In an effort to keep this testimony as brief as possible, we will examine just one of the three tests, Algebra I.

Illustration 2 provides a quantified reporting of the actual scores that meet the Department of Education's description of Proficient, or passing. There are 6 modules in the assessment. In the first module, Operations with Real Numbers and Expressions, there are 9 possible points. If a student got 3 of them, or a percentage of 33%, he was deemed Proficient. In no module did a student have to reach an achievement level of more than 60% to be reported as Proficient. Remember that Proficient was defined as “satisfactory performance indicating a solid understanding”.

No reasonable educator or parent would consider performance levels ranging from 33% to 60% as indicating a solid understanding of the subject matter. In fact, students receiving such scores in a regular classroom would be failing.

This situation clearly illustrates why one of the fundamental standards for valid and reliable testing is the requirement that the testing entity have no relationship with the program or organization being evaluated. Pennsylvania adheres to this fundamental standard when, for example, the Commonwealth requires all registered non-profits to submit independent audits and reviews with their financial information. But with the keystones, the Department of Education is effectively evaluating itself – testing its own system, setting its own standards for success, and then reporting on its own results. As the Keystone numbers sadly demonstrate, the final effect is that Pennsylvania’s students received Performance Level reports that were essentially meaningless as valid indicators of their actual achievement.

**Performance Summary by Assessment Anchor**  
Based on Current Test Administration

**All Testers Performance Summary by Assessment Anchor**

Algebra I	Points Possible	Minimum Estimated Points Needed to Pass	Median	State Percent of Students Earning More Than Minimum Points
Module 1 – Operations and Linear Equations & Inequalities	30	15	14	33.0%
<b>A1.1.1 Operations with Real Numbers and Expressions</b>	9	3	3	34.1%
<b>A1.1.2 Linear Equations</b>	10	6	5	36.3%
<b>A1.1.3 Linear Inequalities</b>	11	6	5	26.2%
Module 2 – Linear Functions and Data Organizations	30	17	15	34.7%
<b>A1.2.1 Functions</b>	10	6	6	37.0%
<b>A1.2.2 Coordinate Geometry</b>	10	6	6	35.5%
<b>A1.2.3 Data Analysis</b>	10	5	4	21.0%

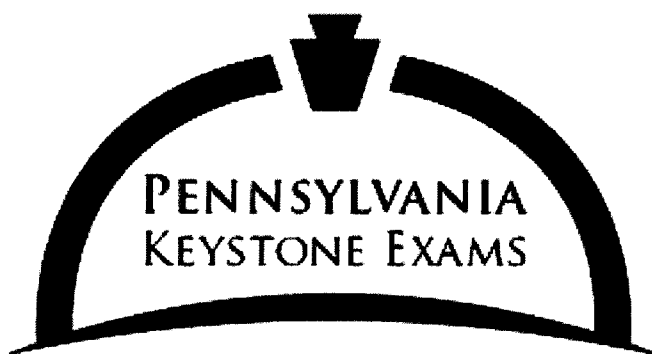
<sup>1</sup> **Median:** The median is the score where approximately half of the students score above and half score below. All medians in this report are calculated based on students' scores. The median is reported instead of the mean because extreme outlier scores can impact the mean for a small group (e.g., 15 or fewer students).

**Illustration 2**

The 2013 Directions for Administration Manual for Algebra I, published by the Pennsylvania Department of Education state that the Keystone is an untimed test, with students (Illustrations 3 and 4) having up to one full school day to complete the assessment. While there are situations in which untimed assessments are appropriate, the fact that the testing conditions are not consistent for all students makes it definitionally impossible for the Keystone Exams to claim that they are valid assessments.



**pennsylvania**  
DEPARTMENT OF EDUCATION



**ALGEBRA I**  
SPRING 2013 EXAM  
DIRECTIONS FOR ADMINISTRATION MANUAL

MAY 2013

Illustration 3

**EXTENDED EXAM TIME**

The Algebra I Spring 2013 Exam is an untimed assessment. Not all students will finish the exam at the same time. Students should not feel rushed while they are taking the exam, and no student should be penalized because he or she works slowly. It is equally important, however, to encourage students to work in a timely manner to finish the exam. Students should close their test booklets and answer booklets when they have finished the module of the

exam in which they had been working. Students who finish early may sit quietly or read for pleasure until all students have finished the exam. Students with special requirements and/or abilities (i.e., physical, visual, auditory, or learning disabilities as defined by their IEP or service contracts) and students who just work slowly may require extended time. Special exam situations should be arranged for these students. When all students have indicated they have finished an exam module, end the module. Students should return to regular activities until the administration of the next module is scheduled to begin.

Students may request extended time if they indicate they have not completed an exam module. Such requests should be granted if the Test Administrator finds the request to be educationally valid. Not permitting ample time for students to complete the exam module may impact performance.

As a general guideline, the exam session should be closed when all the students indicate they have finished an exam module.

When allowing extended time for an exam session for a portion of the student population:

- Do not allow students to attend a lunch period with other students if the lunch period occurs between the original exam session and the extended exam session.
- Do not allow students to attend any classes or related activities between the original exam session and the extended exam session.
- Do not allow any overnight extensions.
- Do not allow students to return to a module after the completion of that module.

Do not allow the extended exam session to be administered without monitoring. It is the responsibility of a Test Administrator to monitor any extended exam session, whether in the classroom where the exam was administered or in a separate classroom.

As the keystones are untimed, there may be instances in which the actual testing times may take longer than the recommended testing time. Exam modules should not be scheduled back-to-back in the morning (or in the afternoon). Instead, the exam modules should be divided across two days or divided across the morning and afternoon of the same day.

For example, do not schedule both Module 1 and Module 2 testing events to occur during the same morning. Rather, schedule Module 1 testing for a morning, and schedule Module 2 testing either the afternoon of the same day or some time the following day.

The same document (Illustration 5) states that a scientific or graphing calculator may be used for the assessment. If some students are using a calculator and some are not, the students are not taking the same test.

This situation means that the Keystone exams are measuring the availability of a calculator as much as they are measuring math skills, which causes the results to again fail the standard for validity.

Additionally, since the cost of a scientific or graphing calculator may result in a disproportionate number of students from lower socio-economic backgrounds taking the test without this electronic aid, such students will, on average, receive lower scores than their more wealthy peers – making the Keystone results more a measurement of the economic backgrounds of the students being tested than of their relative mathematical ability.

KEYSTONE  
ALGEBRA I
PART I: PROCEDURES FOR THE ALGEBRA I SPRING 2013 EXAM

- Students must use a No. 2 pencil; an ink pen may not be used.
- Students may highlight, underline, and make notes or comments in the test booklet, but they must record their answers in the answer booklet. They may also use scratch/grid paper. All scratch/grid paper must be collected and returned to the School Assessment Coordinator.
- Students should not make any extraneous marks in the answer booklet (e.g., crossing out answers believed to be incorrect or marking multiple answers thought to be correct), but should only mark their final response in the answer booklet.
- The Algebra I Spring 2013 Exam includes questions that require students to select from four possible answer choices. These multiple-choice questions and answer choices are found in the test booklet. Students will read each question and record their answer in the spaces provided in their answer booklet only. Answers written or marked in the test booklet will not be scored.
- The Algebra I Spring 2013 Exam includes questions that require students to write a response. These questions appear in the answer booklet only. Students will read the question in their answer booklets and write their responses in the space provided in the answer booklet only. Answers written in the test booklet or on scratch/grid paper will not be scored.

- Students may use calculators for the Algebra I Spring 2013 Exam. (Scientific calculators and graphing calculators are optional, but recommended.) *Note:* Students may not share calculators during the exam. For more information, see the *Pennsylvania Calculator Policy* in Appendix E of this manual. This document is also posted on these portals:
  - <https://pa.doe.direct.com>. [Click on "Documents" under the "General Information" tab.]
  - [www.education.state.pa.us](http://www.education.state.pa.us). [Click on the green check mark and select "Keystone Exams."]

Students are permitted to:	Students are NOT permitted to:
<ul style="list-style-type: none"> <li>• use scratch/grid paper. (Students may use it to create their own graphic organizers, etc., during the exam.)</li> <li>• highlight, underline, and make notes or comments in the test booklet.</li> <li>• use a calculator on the exam in accordance with the <i>Pennsylvania Calculator Policy</i> (see Appendix E).</li> </ul>	<ul style="list-style-type: none"> <li>• use preprinted graphic organizers.</li> <li>• possess or use hand-held computers, cell phones, smart phones, cameras, personal computers, personal data assistants (PDAs), dictionaries (with the exception of ELL students), thesauri, and spell- or grammar-checkers when responding to any part of the exam.</li> </ul>


Pennsylvania Department of Education
- 4 -
Algebra I DFA Manual

Illustration 5

The State offers the option of an online calculator to those students taking the test online. However, the most financially challenged school districts do not have the computer capacity to offer the test online, and

are administering it in paper-and-pencil format. So the online calculator option is only available to those districts that have the financial resources to offer the test to all their students online. This may assist students of lower socio-economic backgrounds who happen to live in such districts, but for those students who do not reside in these areas this option is irrelevant.

The Algebra I Keystone exam includes Constructed Response Questions (Illustration 6), in which the students are required to explain how and why they solved the math problem before them. The responses are graded on a scale of 0 to 4 points, based on the way that they explained their work. The evaluators are given a verbal description of the type of response that matches the various point values, and then must use their personal judgment to determine how each student response corresponds to scoring guidelines.

**KEYSTONE**  **REFERENCE**

**ALGEBRA I CONSTRUCTED-RESPONSE QUESTIONS**

**GENERAL DESCRIPTION OF SCORING GUIDELINES**

**4 Points**

- The response demonstrates a thorough understanding of the mathematical concepts and procedures required by the task.
- The response provides correct answer(s) with clear and complete mathematical procedures shown and a correct explanation, as required by the task. Response may contain a minor "blemish" or omission in work or explanation that does not detract from demonstrating a thorough understanding.

**3 Points**

- The response demonstrates a general understanding of the mathematical concepts and procedures required by the task.
- The response and explanation (as required by the task) are mostly complete and correct. The response may have minor errors or omissions that do not detract from demonstrating a general understanding.

**2 Points**

- The response demonstrates a partial understanding of the mathematical concepts and procedures required by the task.
- The response is somewhat correct with partial understanding of the required mathematical concepts and/or procedures demonstrated and/or explained. The response may contain some work that is incomplete or unclear.

**1 Point**

- The response demonstrates a minimal understanding of the mathematical concepts and procedures required by the task.

**0 Points**

- The response has no correct answer and insufficient evidence to demonstrate any understanding of the mathematical concepts and procedures required by the task.

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### Illustration 6

So the subjective judgments of multiple evaluators are the criteria for grading student responses. To illustrate how this plays out, consider the Olympics. In both figure skating and gymnastics, this is the exact system of scoring that is employed. Judges are given a scoring guide to use while evaluating the athlete's routine. They all watch the same routine at the same time and use the same set of evaluation guidelines, and yet they each give a different score. Some judges interpret the guidelines more strictly, and some more leniently. Sometimes the differences are minor, and sometimes they are not.

The subjective nature of this scoring has been the source of debate in Olympic circles for many years because it is obvious to all that such a scoring system is neither valid nor reliable. Yet this is exactly the system used in the constructed response part of the Keystones.

With one major difference. The Olympic committee now averages the scores of the judges in an attempt to correct for differences in personal judgments. The Keystones do not. So if a particular student assessment happens to be in the hands of an evaluator who interprets the guidelines strictly, that student will receive a lower score than one whose assessment happens to be evaluated by someone who was using a more lenient interpretation. Yet no student will know that this is what occurred, and that if their response had been evaluated by a different individual, it could very well have received a different score.

The result is that the Keystone Constructed Response Questions are neither valid nor reliable.

This situation, however, is not the only difficulty with the Constructed Response Questions. Illustrations 7 and 8 provide the guidelines for a 3-Point evaluation score. In the example given, the student correctly completed the entire Algebra problem, meaning that he actually did all of the required math. He is downgraded because he did not write an adequate explanation of his work.

This makes the Keystone a writing test, not a math test. But to be valid, an assessment must measure **ONLY** what it is said to measure. In fact, in valid assessments, the evaluator is required to make all necessary adjustments to other factors to insure that they do not affect the behavior or item being measured. The Keystone Constructed Response Questions do exactly the opposite.

It is easy to dismiss the impact of this scoring because a 4-point scale is used. So it appears that the student is only losing 1 point. To understand the impact, let us convert the 4 point scale to the traditional 100 point scale. That 1 point is equivalent to 25 points – meaning that a student who did all the math correctly would be downgraded from a 100% to a 75%, or from an 'A' to a 'C', because of the completely subjective evaluation of something that is not even math.

But the problem does not end with the inherent invalidity and unreliability of the assessment.

Consider which students are the most likely to have a greater problem with this element. Students from lower socio-economic backgrounds, students with language barriers, and students with learning disabilities typically demonstrate lower scores on language assessments. So, on average, they will be more likely to experience difficulty in fully explaining the specific steps they took and the rationale for taking them. So, according to this scoring rubric, they will receive a lower score than their more verbal counterparts – even though they correctly completed the math problem.

This sets up a situation that is sadly discriminatory, since the scoring masks the mathematical achievement levels of these students and instead punishes them for language barriers. So students are harmed, and no actual valid and reliable data on the mathematical achievement of Pennsylvania's students has been obtained.



A1.2.1 Response Score: 3 points

11. Hector's family is on a car trip.

When they are 64 miles from home, Hector begins recording their distance driven each hour in the table below.

Distance by Hour

Time in Hours	Distance in Miles
0	64
1	146
2	208
3	270

The pattern continues.

- A. Write an equation to find distance driven in miles ( $d$ ) after a given number of hours ( $h$ ).

$$d = 62h + 84$$

Student has given a correct equation.

- B. Hector also kept track of the remaining gasoline. The equation shown below can be used to find the gallons of gasoline remaining ( $g$ ) after distance driven ( $d$ ).

$$g = 16 - \frac{1}{20}d$$

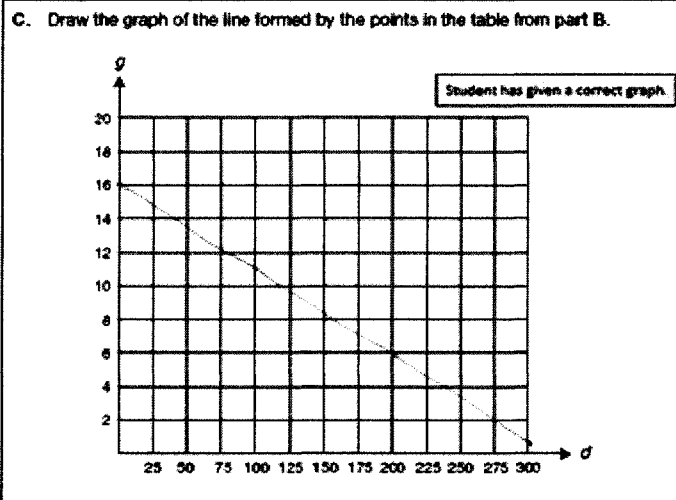
Use the equation to find the missing values for gallons of gasoline remaining.

Distance Driven in Miles ( $d$ )	Gallons of Gasoline Remaining ( $g$ )
100	9
200	6
300	3

Student has given correct values.

Go to the next page to finish question 11.

11. *Continued* Please refer to the previous page for task explanation.



D. Explain why the slope of the line drawn in part C must be negative.

The slope is negative because miles go up

Student has given an incomplete explanation.

Based on Scoring Guidelines, 3 points is representative of a "general understanding."

Illustration 8

Section 4.23(c)(iii)(K) deals with supplemental instruction. It states that any student who does not demonstrate proficiency on a Keystone Exam shall be offered supplemental instructional support by the school.

It has already been demonstrated that the Keystone exams do not validly measure what they claim to assess. In the case of the Algebra I assessment, the bias against students from lower socio-economic backgrounds will not only result in a lower score, but in further harm to their educational progress, since instead of being able to move forward into higher level mathematics, they must spend instructional time being remediated in Algebra I – even if they do not need to be.

This situation has an impact not only on their progress in mathematics, but in science, since without the math of Algebra II, physics becomes impossible. This slowing down of their educational progress has the potential to deny these children the opportunity to pursue career goals that require this science

background. So the invalid results of a flawed testing instrument can have devastating consequences to the futures of our children.

There is also the issue of cost. Illustration 9 below reveals that in the Algebra I Keystone for 2011 (the last year for which results are available) 58,224 students need to be remediated. Each local school district will be required to find the additional funds necessary to add this remediation to their programming. For purposes of obtaining a “lowest bottom line” estimate of the cost of this provision, we will examine one of the least expensive mechanisms for remediation. We will use a tutoring model instead of hiring additional staff, and assume that students will use pre-existing materials and work at home instead of using school facilities. We will assign a teacher to work with each student for just 1 hour per week, at a rate of \$20 per hour.

That means that we will take 58,224 students x \$20 x 36 weeks. We are looking at \$41,921,280 – every penny of which must come from the budgets of already overburdened school districts. And that figure would only be increased if districts hired additional staff, and used additional supplemental materials.

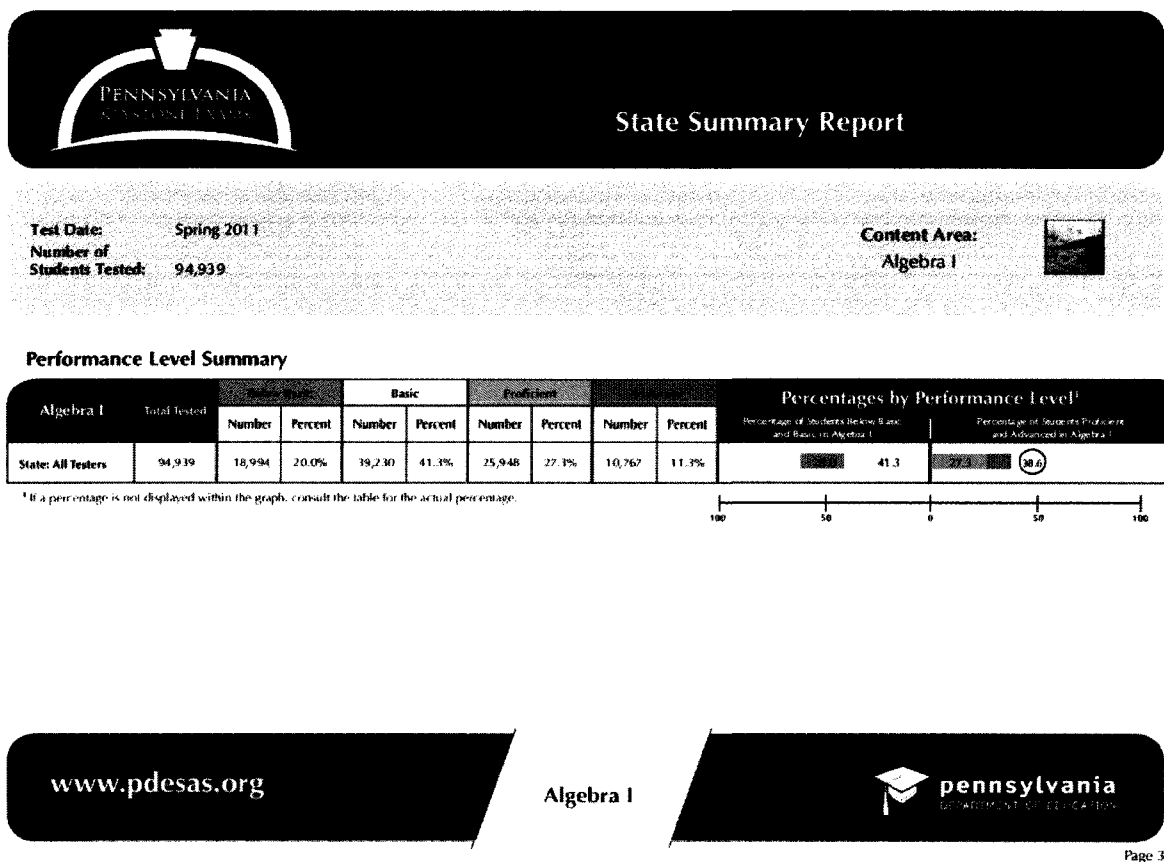


Illustration 9

But that nearly \$42 million dollar price tag would not be equally divided among the school districts of Pennsylvania. Illustration 10 reveals that 79.5% of the students from economically disadvantaged backgrounds will require remediation. In raw numbers we are looking at 21,675 students. This means that districts such as Philadelphia, where there is a higher percentage of economically disadvantaged students, will bear a disproportionate share of this economic burden. Yet Philadelphia and other urban school districts are already financially overwhelmed. To increase that financial burden based on the invalid results

of a flawed testing instrument is a disservice to every student in those districts, not just the ones who require remediation.

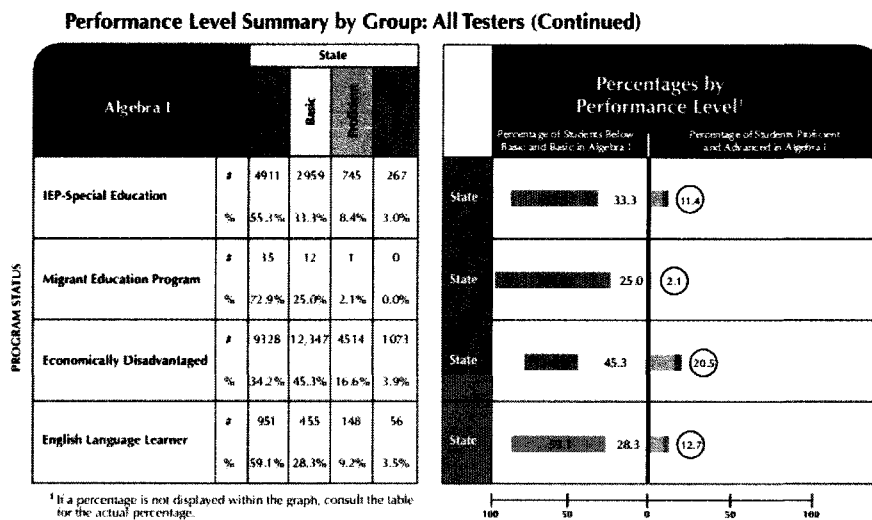


Illustration 10

It is necessary to remember that these figures are based on only one of the three required Keystones. To arrive at a more realistic picture of the number of students who would actually require remediation, we need to include the mandated Literature and Biology tests. In 2011, 94,919 students took the Algebra I test, while only 46,998 students took Biology and 42,815 took the Literature test. Since these tests will be required of all students, we can expect the Biology and Literature testing numbers to rise to the levels of Algebra I. If we apply the percentage of students requiring remediation to a full roster of students we are looking at 47,611 remedial students for Literature and 61,090 remedial students for Biology. Even using our “lowest bottom line” calculations, we are looking at an additional cost of over \$78 million, bringing our total to \$120 million, which local school districts would have to add to their budgets, just to accomplish the mandated remediation from one year’s administration of the Keystones.

As this system moves forward, each district will be dealing with multiple years of students taking the Keystones for the first time, and with students who are seeking additional supplemental instruction to take the test multiple times.

Section 4.51C deals with Project Based Assessment. Students who do not reach the Proficient level on a Keystone exam after 2 attempts may instead complete a project in the relevant subject. Illustration 11 outlines the Department’s requirements for the Project-Based Assessments. Question 5 stipulates that every student participating in a project-based assessment will be assigned a monitor, and be provided with additional supplemental instruction. All work on the project, projected to be 5 – 7 hours per module, is to be completed in a monitored environment. If a student has failed to receive a Proficient on more than one module of the Keystones, he is permitted to complete a project for each module that he failed. This means that one student may require monitoring for several 5 – 7 hour projects. The 5 – 7 hours do not include the additional supplemental instruction – they just include the time to be spent on the project.

At this point, there is no accurate mechanism for predicting the cost of the project-based assessment. Let us, therefore, estimate a “lowest bottom line”. We will begin with the 166,925 students who would require

remediation based on the 2011 administration of the Keystones, as computed above. We will assume that 67% of that number or 111,840 of those students are deemed Proficient on their second try, leaving 55,085 students who are eligible for the Project-Based Assessment. We will further assume that each of these students only requires one module in one subject. Using our previous bottom line approach of \$20 per hour for each monitor and no supplemental instruction costs, we arrive at 55,085 students x 7 hours x \$20 = \$7,711,900.

In the real world, this “lowest bottom line” is beyond optimistic. There will not be a 67% success rate among re-testing students, the vast majority of those students will need a project for more than one module, and additional supplemental instruction will be required in almost every case. In the real world, the costs will be prohibitive. And, those costs will continue to increase as the number of students using the project-based assessment mechanism will grow with each administration of the Keystones.

These funds must come from somewhere, so districts will have no choice but to redirect money from other programs, thereby negatively affecting the education of students who were not themselves involved in either the initial remediation or the project-based assessments. It is the ultimate “teaching to the test” situation, as Keystone remediation and project costs consume funds that had been supporting other programs.

And as already documented, the majority of these costs will be borne by our urban districts, which have the highest percentage of students from economically disadvantaged backgrounds, meaning that these districts will be the most likely to curtail any programming that does not focus on “passing the test.” Yet the students in these districts are the children who most need an educational experience that challenges them to look beyond the limits of their economic backgrounds and offers them opportunities to reach what they see.

The true cost of the Keystones then, is not in the test development, administration, scoring or reporting. It is not even in the burden of remediation and projects. The true cost of the Keystones is the loss of the ability of local teachers and school districts to offer their students more than the bare minimum in educational options and opportunities. The proponents of these regulations speak often about how they focus on the “floor” of academic achievement. They are correct in that assertion – but when education aims at the floor, too many of our children will never get out of the basement.

Section 4.23 (IV) addresses the validation of local assessments. It states that the cost of validating a local assessment will be equally borne by the Department of Education and the local district, and that if the Department does not provide sufficient funding the local assessment “shall be deemed valid”. So an unvalidated testing instrument shall just be called valid and then used to determine whether or not a student graduates. This is nothing short of educational malpractice.

<b>KEYSTONE PROJECT BASED ASSESSMENT SYSTEM FREQUENTLY ASKED QUESTIONS</b>	
<b>3. If a student fails a module and chooses to complete a project based assessment for that module, what is the number of hours, on average, the project should require for completion?</b>	<i>A project should average 5-7 hours.</i>
<b>4. What direction will districts have in terms of a timeline for student completion of projects?</b>	<i>Districts will be encouraged to have monitors work with students to develop and follow a reasonable timeline for project completion.</i>
<b>5. What is the district's responsibility in terms of oversight of the Keystone Exams and projects?</b>	<p><i>A student who has not demonstrated proficiency on a Keystone Exam after a first failed attempt shall be offered, per Chapter 4 regulations, supplemental instructional support by the student's school entity. The supplemental instructional support must assist the student to attain proficiency.</i></p> <p><i>After a second failed attempt on a Keystone Exam, the district should provide supplementary instruction related to the Assessment Anchor/Eligible Content (AA/EC) for the module in which the student did not score at a proficient level in the Keystone Exam.</i></p> <p><i>When a student begins the project based assessment, s/he should be assigned a monitor. The role of the monitor is to administer the project, check progress, and submit the project for regional review.</i></p> <p><i>The district monitor may refer a student to a subject area teacher for remediation/ supplementary instruction related to the Assessment Anchor/Eligible Content (AA/EC) for the module in which the student is doing a project. The monitor may identify specific project related AA/EC for which the student requires instruction; however, no direct assistance on the actual project may be provided.</i></p>
<b>6. Is the expectation for students to work on projects during school hours or independently either at home or school?</b>	<i>Schools must provide a monitored environment in which students work independently before, during, or after school.</i>
<b>7. How do we address cheating/plagiarism?</b>	<i>A student contract will include details on the project's timeline, expectations, and a warning related to plagiarism and cheating. Parent/guardian will receive a copy of the student contract.</i>

## Illustration 11

Section 4.4(d)(2) states that there must be a process for parents to review instructional materials. Since the Department is placing their model curriculum online, and districts are being strongly encouraged to use that online curriculum, how will the parents who do not have a computer in their home be able to review

instructional materials in a meaningful way? And since those from a lower socio-economic background are least likely to have a home computer, these regulations are placing an undue burden on those least able to bear it.

Section 4.4(d)(5) states that parents have the right to have their children excluded from research studies or surveys conducted by entities other than a school entity unless prior written consent has been obtained.

This language does not agree with federal law. Federal law INCLUDES school entities in the requirements for prior written parental consent. The federal Protection of Pupil Rights Amendment states:

*"This provision applies to surveys funded in whole or part by any program administered by the U. S. Department of Education (ED). PPRA provides:*

- *that schools and contractors make instructional materials available for inspection by parents if those materials will be used in connection with an ED-funded survey, analysis, or evaluation in which their children participate; and*
- *that schools and contractors obtain prior written parental consent before minor students are required to participate in any ED-funded survey, analysis, or evaluation that reveals information concerning:*
  1. *political affiliations or beliefs of the student or the student's parent;*
  2. *mental and psychological problems of the student or the student's family;*
  3. *sex behavior or attitudes;*
  4. *illegal, anti-social, self-incriminating, or demeaning behavior;*
  5. *critical appraisals of other individuals with whom respondents have close family relationships;*
  6. *legally recognized privileged or analogous relationships, such as those of lawyers, physicians, and ministers;*
  7. *religious practices, affiliations, or beliefs of the student or student's parent; or*
  8. *income (other than that required by law to determine eligibility for participation in a program or for receiving financial assistance under such program).*

*Subsections a and b of PPRA generally apply when a survey is funded, at least in part, by any program administered by the Secretary of Education.*

*The provisions apply to educational agencies or institutions that receive funds from any program of the Department of Education. Thus, public elementary and secondary schools are subject to the provisions of PPRA."*

The State Board language is in clear conflict with these federal requirements, which not only violates federally protected pupil rights, but opens Pennsylvania schools up to the potential of federal investigation and prosecution, and civil liability.

Section 4.51 deals with state assessments. Subsection (G) states that the Department and other Commonwealth entities are prohibited from collecting individual student test scores and may collect only aggregate test scores by school and district.

In its State Fiscal Stabilization Fund application, Pennsylvania assured the federal Department of Education that "the State will establish a longitudinal data system that includes the elements described in section 6401(e)(2)(D) of the America COMPETES Act." (Illustration 12)

Illustration 13 comes directly from the National Center for Education Statistics. Each of the federally required elements of the data systems is listed. Element number 3 was State Assessment Scores.

To receive its Phase Two funds from the Stabilization Fund, PA was required to give the federal government an update on its progress on the data system. In that update, each of the required elements was addressed. In the highlighted section of Illustration 14, PDE told the federal government that it had completed the data element "Yearly state assessment records for individual students".

In its Phase Two Race to the Top application, Section C – Pages 5 and 6, the Pennsylvania Department of Education and the State Board included Exhibit C.2. The headline for the Exhibit states "Pennsylvania's Statewide Longitudinal Data System includes all 12 of the elements identified in the America COMPETES Act."

In the chart for Exhibit C.2, section 6 states the required element as follows:

*"Yearly test records of individual students with respect to assessments under section 1111(b) of the ESEA Act of 1965"*

The same section records Pennsylvania's justification for meeting the element as:

*"Pennsylvania currently collects student level data on all state assessments within PIMS."*

This is documented in Illustration 15.

In May of 2010, PA received a \$14.3 million grant from the National Center for Education Statistics. Illustration 16 lists the activities for which the grant money would be used. The highlighted section states, "Yearly test scores of individual students." The chart indicates that PDE was in the process of building this data element, and would be using the funds in the grant to complete its construction.

So, the Department of Education received federal funds to build the data base, the federal government required that the data base include the state assessment scores for individual students, and PDE told the federal government - on more than one occasion - that it does, in fact, collect and store those individual scores in the state data base.

But it is not just what the Department told the federal government. Illustration 17 is the Report Interpretation Guide published by the Pennsylvania Department of Education. Section One of the guide includes student information. That information lists the student's unique Identification Number, which is the number assigned to the student in the Pennsylvania Information Management System. The same section includes the date that student took the Keystone examination and the student's grade. So the Department, does, in fact, have the individual student test scores in its data base, and those scores are identifiable.

Illustration 18 is the August 2013 Assessment Update from the Department of Education. On page 3, the document addresses both the Summer keystones and the Winter keystones for 2013. Of particular note are the directives for the Department's Online Corrections System. Districts are directed to update all student demographic information to ensure a match to the state data base. The districts are then told that this data system "allows users to link student records from the 2013 Summer Keystone Exams to past Keystone test events." If the state data base did not contain the individual student assessment records this would not be possible.

The same language is used on the same page when the Department speaks about the 2013 Winter Keystone assessments.



The obvious untruth in Section 4.51(G) in the regulations is beyond disturbing. It calls into question every statement made by the Department in defense of their proposed changes to Pennsylvania's educational system. Our children need, and deserve, the best education that we can offer them. If parents, teachers, taxpayers, and legislators cannot trust the veracity of the educational bureaucracy charged with overseeing a system in which this quality education occurs, a cooperative effort among the parties becomes structurally impossible.

Under these circumstances, I urge the Independent Regulatory Review Commission to disapprove these regulations and insist that they be revised to accurately describe the actions of the Department of Education, that a true and accurate cost analysis of the effect of this transition be presented, and that any and all evaluations conducted by the Department for the purposes of analyzing student performance, setting graduation requirements, and evaluating teachers and school districts actually meet accepted standards for testing validity and reliability.

Thank you.

**PART 2, SECTION A: EDUCATION REFORM ASSURANCES**

The Governor or his/her authorized representative assures the following:

- (1) The State will take actions to improve teacher effectiveness and comply with section 1111(b)(8)(C) of the Elementary and Secondary Education Act of 1965, as amended (ESEA) (20 U.S.C. 6311(b)(8)(C)) in order to address inequities in the distribution of highly qualified teachers between high- and low-poverty schools, and to ensure that low-income and minority children are not taught at higher rates than other children by inexperienced, unqualified, or out-of-field teachers. (*Achieving Equity in Teacher Distribution Assurance*)
- (2) The State will establish a longitudinal data system that includes the elements described in section 6401(e)(2)(D) of the America COMPETES Act (20 U.S.C. 9871(e)(2)(D)). (*Improving Collection and Use of Data Assurance*)
- (3) The State will -
  - (3.1) Enhance the quality of the academic assessments it administers pursuant to section 1111(b)(3) of the ESEA (20 U.S.C. 6311(b)(3)) through activities such as those described in section 6112(a) of the ESEA (20 U.S.C. 7301a(a)); (*Improving Assessments Assurance*)
  - (3.2) Comply with the requirements of paragraphs (3)(C)(ix) and (6) of section 1111(b) of the ESEA (20 U.S.C. 6311(b)) and section 612(a)(16) of the Individuals with Disabilities Education Act (IDEA) (20 U.S.C. 1412(a)(16)) related to the inclusion of children with disabilities and limited English proficient students in State assessments, the development of valid and reliable assessments for those students, and the provision of accommodations that enable their participation in State assessments; (*Inclusion Assurance*) and
  - (3.3) Take steps to improve State academic content standards and student academic achievement standards consistent with section 6401(e)(1)(A)(ii) of the America COMPETES Act. (*Improving Standards Assurance*)
- (4) The State will ensure compliance with the requirements of section 1116(b)(7)(C)(iv) and section 1116(b)(8)(B) of the ESEA with respect to schools identified under these sections. (*Supporting Struggling Schools Assurance*)

Governor or Authorized Representative of the Governor (Printed Name):	
Signature: (Document on File with the U.S. Department of Education - No Further Action Necessary)	Date:

## Elements of Longitudinal Data Systems (America Competes Act)

1. Student Enrollment Information
2. Information on Graduates, Transfers, Dropouts
3. State Assessment Scores
4. Information on Students Not Tested
5. College-Readiness Test Scores
6. A Teacher Identifier System
7. Student Transcript Information
8. Data on Student Transition and Success in College
9. Data on Preparation for Success in Postsecondary Education
10. An Audit System to Ensure Data Quality
11. Ability to Share Data from Preschool Through College
12. Unique Student Identifiers

<b>Indicator</b>	<b>Progress</b>	<b>URL</b>	<b>State Plan</b>
<b>Indicator (a)(6):</b> Indicate, for each LEA in the State, whether the systems used to evaluate the performance of principals include student achievement outcomes or student growth data as an evaluation criterion.	Less than 50%	Same as Phase 2  Updated URL: Insert URL here	Same as Phase 2  URL to State Plan: Insert URL here
<b>Indicator (a)(7):</b> Provide, for each LEA in the State whose principals receive performance ratings or levels through an evaluation system, the number and percentage (including numerator and denominator) of principals rated at each performance rating or level.	Less than 50%	Same as Phase 2  Updated URL: Insert URL here	Same as Phase 2  URL to State Plan: Insert URL here

**Assurance (b): Improving Collection and Use of Data**

<b>Indicator</b>	<b>Progress</b>	<b>URL</b>	<b>State Plan</b>
<b>Indicator (b)(1) element 1:</b> A unique statewide student identifier that does not permit a student to be individually identified by users of the system	Completed	Same as Phase 2  Updated URL: Insert URL here	Same as Phase 2  URL to State Plan: Insert URL here
<b>Indicator (b)(1) element 2:</b> Student-level enrollment, demographic, and program participation information	Completed	Same as Phase 2  Updated URL: Insert URL here	Same as Phase 2  URL to State Plan: Insert URL here
<b>Indicator (b)(1) element 3:</b> Student-level information about the points at which students exit, transfer in, transfer out, drop out, or complete pre-K through postsecondary education programs	Completed	Same as Phase 2  Updated URL: Insert URL here	Same as Phase 2  URL to State Plan: Insert URL here
<b>Indicator (b)(1) element 4:</b> The capacity to communicate with higher education data systems	Completed	Same as Phase 2  Updated URL: Insert URL here	Same as Phase 2  URL to State Plan: Insert URL here

<b>Indicator</b>	<b>Progress</b>	<b>URL</b>	<b>State Plan</b>
<b>Indicator (b)(1) element 5:</b> An audit system assessing data quality, validity, and reliability	<b>Completed</b>	Same as Phase 2  Updated URL: Insert URL here	Same as Phase 2  URL to State Plan: Insert URL here
<b>Indicator (b)(1) element 6:</b> Yearly State assessment records of individual students	<b>Completed</b>	Same as Phase 2  Updated URL: Insert URL here	Same as Phase 2  URL to State Plan: Insert URL here
<b>Indicator (b)(1) element 7:</b> Information on students not tested, by grade and subject	<b>Completed</b>	Same as Phase 2  Updated URL: Insert URL here	Same as Phase 2  URL to State Plan: Insert URL here
<b>Indicator (b)(1) element 8:</b> A teacher identifier system with the ability to match teachers to students	<b>Completed</b>	Same as Phase 2  Updated URL: Insert URL here	Same as Phase 2  URL to State Plan: Insert URL here
<b>Indicator (b)(1) element 9:</b> Student-level transcript information, including on courses completed and grades earned	<b>Completed</b>	Same as Phase 2  Updated URL: Insert URL here	Same as Phase 2  URL to State Plan: Insert URL here
<b>Indicator (b)(1) element 10:</b> Student-level college readiness test scores	<b>Completed</b>	Same as Phase 2  Updated URL: Insert URL here	Same as Phase 2  URL to State Plan: Insert URL here
<b>Indicator (b)(1) element 11:</b> Information regarding the extent to which students transition successfully from secondary school to postsecondary education, including whether students enroll in remedial coursework	<b>Completed</b>	Same as Phase 2  Updated URL: Insert URL here	Same as Phase 2  URL to State Plan: Insert URL here
<b>Indicator (b)(1) element 12:</b> Other information determined necessary to address alignment and adequate preparation for success in postsecondary education	<b>Completed</b>	Same as Phase 2  Updated URL: Insert URL here	Same as Phase 2  URL to State Plan: Insert URL here

**Exhibit C.2: Pennsylvania's Statewide Longitudinal Data System includes all 12 of the elements identified in the America COMPETES Act**

(PDE = Pennsylvania Department of Education)

12 Elements of the America COMPETES Act	Current PA SLDS Status	Justification
1. Unique statewide student identifier that does not permit a student to be individually identified by users of the system (except as allowed by Federal and State law)	<b>Met</b>	- Since 2008, Pennsylvania has assigned all public k-12 students a unique, confidential and secure identifier called the PASecureID. In 2008, this identifier was expanded to include both postsecondary and pre-K students.
2. Student-level enrollment, demographic, and program participation information	<b>Met</b>	- Within the Pennsylvania Information Management System (PIMS), Pennsylvania collects the necessary student-level enrollment, demographic, and program participation information to comply with all federal K-12 reporting requirements and to inform research, evaluation, and policy analysis.
3. Student-level information about the points at which students exit, transfer in, transfer out, drop out, or complete P-16 education programs	<b>Met</b>	- Pennsylvania has the capacity through its PASecureID and data from the National Student Clearinghouse, to track students through the entire educational pipeline including drop outs, transfers, and completions, and to calculate a cohort graduation rate. -
4. Capacity to communicate with higher education data systems	<b>Met</b>	- Pennsylvania currently collects unit level data in PIMS on students enrolled in our 14 state system universities and our 14 community colleges. We also have a statewide contract with the National Student Clearinghouse and have successfully matched data with the Clearinghouse and our entire high school graduating classes for 2007-08 and 2008-09.

12 Elements of the America COMPETES Act	Current PA SLDS Status	Justification
5. State data audit system assessing data quality, validity, and reliability	<b>Met</b>	<ul style="list-style-type: none"> <li>- Pennsylvania reviews, edits, and applies robust business rules to our SLDS data. State auditors routinely visit local education agencies to ensure the data reported is complete, valid and reliable.</li> <li>- As part of ensuring reliable data input to PIMs, district superintendents and IHE presidents are required to sign an affidavit certifying the accuracy of the data they submit.</li> </ul>
6. Yearly test records of individual students with respect to assessments under section 111 1(b) of the ESEA Act of 1965	<b>Met</b>	- Pennsylvania currently collects student level data on all state assessments within PIMS.
7. Information on students not tested, by grade and subject	<b>Met</b>	- Pennsylvania collects student level data on students not tested.
8. Teacher identifier system with the ability to match teachers to students	<b>Met</b>	- Pennsylvania has assigned all teachers unique identifiers which enables us to match teachers to students and to courses.
9. Student-level transcript information, including information on courses completed and grades earned	<b>Met</b>	- Pennsylvania currently collects course information and grades.
10. Student-level college readiness test scores	<b>Met</b>	- Pennsylvania has contracted with The College Board to receive student level SAT information and has successfully entered those data into PIMS.



## Statewide Longitudinal Data Systems Grant Program

Designing, Developing, Implementing, & Using Longitudinal Data Systems to Improve Student Learning

Search SLDS

**Program Overview**

-- Select a state --

**Grant Information**

Grantee State - Pennsylvania

**Grantee States**

Websites:

- [Pennsylvania Department of Education](#)
- [Pennsylvania Information Management System \(PIMS\)](#)



**Resources**

**Related Initiatives**

**Contact Info**

2009-ARRA Grant Application

**Pennsylvania Information Management Systems (PIMS)**

Start Date: 7/1/2010

End Date: 6/30/2014

Project Director: Dave Ream

Amount Awarded: \$14,284,020

**Project Application** 9.2 MB

**Project Abstract** 127 KB

Major Outcomes:

- Connect to workforce data
- Connect to Adult Basic Literacy Education (ABLE) data
- Expand postsecondary database
- Expand existing student and teacher data in the Pennsylvania Information Management System (PIMS)
- Link kindergarten assessment outcomes and demographic data in PIMS
- Link PA Federal Head Start program data into Early Learning Network (ELN)
- Implement eTranscripts and Electronic Student Record Exchange
- Conduct feasibility and connectivity studies across all agencies and states
- Establish rigorous data use policy and data audit plans, procedures and training
- Ensure and enhance access to and use of data

[◀ Back to Grantee States](#)

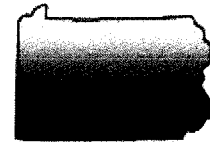


Illustration 16



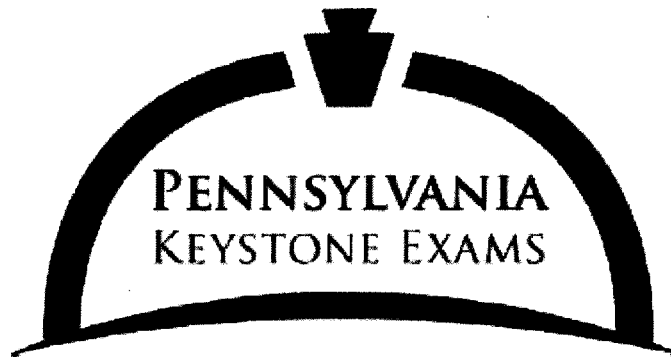
**Exhibit A-2. Pennsylvania's Status on the 7 Elements and 12 Capabilities in the RFA**

Element	Current	With This Grant
Ability to examine student progress and outcomes PK-20 & into the workforce	⊙	●
Ability to facilitate and enable data exchange among agencies and institutions within and between states	⊙	●
Must link student data with teachers	●	
Ability to link information about certification and teacher prep programs and institutions where trained with individual teachers	⊙	●
Must enable data to be easily generated for timely use including reports to parents, teachers, and school leaders	○	●
Must ensure quality and integrity of data	⊙	●
Must provide state with ability to meet ED's reporting requirements	⊙	●
Capability	Current	With This Grant
Unique statewide student identifier	●	
Student-level enrollment, demographic, and program participation information	●	
Student-level information: exit, transfer in, transfer out, drop out, or complete P-16 education program	⊙	●
Capacity to communicate with higher education data systems	⊙	●
State data audit systems assessing data quality, validity, and reliability	⊙	●
Yearly test scores of individual students	⊙	●
Information: students not tested by grade and subject	●	
Teacher identifier system with ability to match teachers to students	●	
Student-level transcript data	○	●
Student-level college readiness test scores	○	●
Data: Successful transition to postsecondary education	⊙	●
Data: Information necessary to address alignment and preparation for postsecondary success	○	●

Illustration 16



**pennsylvania**  
DEPARTMENT OF EDUCATION



**REPORT INTERPRETATION GUIDE**  
**KEYSTONE EXAMS**

**Spring 2011**  
**Administration**

Illustration 17

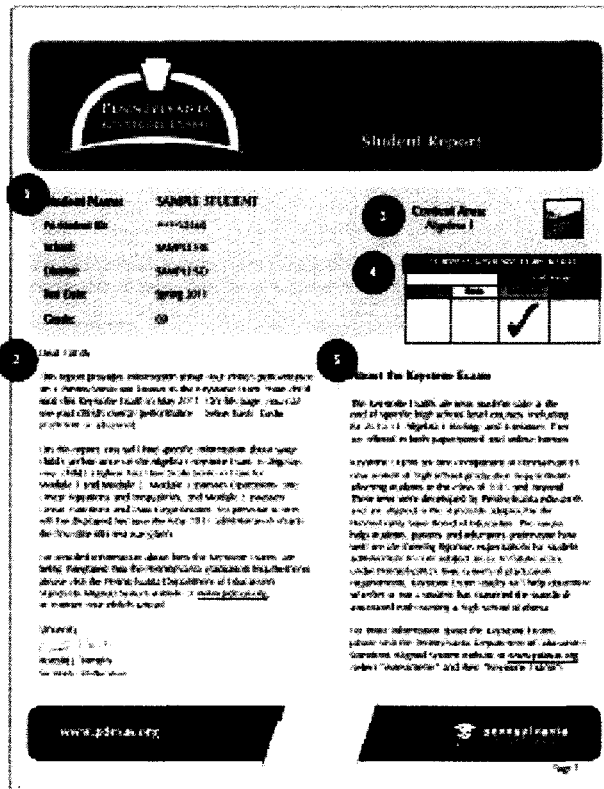


**GUIDE TO READING THE STUDENT REPORT**

The Keystone Exams are one component of Pennsylvania's new system of high school graduation requirements for students in the class of 2015 and beyond. Students take the exams toward the end of specific courses, beginning in 2010-2011 for Algebra I, Biology, and Literature.

The Student Report displays how a student performed on each Keystone Exam. This guide helps explain the scores on the student's report. If the student did not take both modules of an exam, part of the report is blank. Remember, these exams are only one measure of the student's growth academically.

- 1 STUDENT INFORMATION**  
This section identifies the student's name, school, district, date of testing, and grade.
- 2 SECRETARY'S GREETING**  
This letter is from the Secretary of Education and describes content assessed on the Keystone Exam.
- 3 CONTENT AREA**  
This is the course or subject matter covered by the Keystone Exam.
- 4 STUDENT'S KEYSTONE EXAM RESULT**  
This table indicates the student's performance level on the Keystone Exam.
- 5 ABOUT THE KEYSTONE EXAMS**  
This is a brief summary of the Keystone Exams.



**1 Student Information**

Student Name:	SAMIRI STEUBERT
Address:	44455555
School:	SAMPLES
District:	SAMPLES
Test Date:	Spring 2011
Grade:	09

**2 Secretary's Greeting**

Dear Sarah,

We agree providing information about your child's performance on a standardized test is one of the ways we can help you understand what your child knows and can do. We hope you find this information helpful. We will continue to work with you to help your child succeed. Please contact us if you have any questions or need more information. We are here to help.

**3 Content Area**

Algebra I

**4 Student's Keystone Exam Result**

Module	Score	Performance Level
Module 1	85	Proficient
Module 2	78	Proficient

**5 About the Keystone Exams**

The Keystone Exams are one component of Pennsylvania's new system of high school graduation requirements for students in the class of 2015 and beyond. Students take the exams toward the end of specific courses, beginning in 2010-2011 for Algebra I, Biology, and Literature. They are aligned to both Pennsylvania's state content standards and the Pennsylvania Department of Education's (PDE) Pennsylvania Core Standards for Mathematics, Science, and Literacy in History and Social Studies.

The Keystone Exams are designed to measure students' understanding of the content and skills assessed in the Keystone Exams. The results help students, parents, and educators understand how well an individual student is prepared for the next level of education. The results also help students, parents, and educators understand how well an individual student is prepared for the next level of education.

For more information about the Keystone Exams, please visit the Pennsylvania Department of Education's website, [www.pde.pa.gov](http://www.pde.pa.gov), or contact PDE at 717-771-3333. You can also contact PDE at 717-771-3333.

[www.pde.pa.gov](http://www.pde.pa.gov)



# Assessment Update

August 2013

## CDT expanding to Grades 3–5

Beginning in May 2014, students in grades 3–5 will be able to participate in the Classroom Diagnostic Tools (CDT). In an effort to finalize the operational tests, DRC will be conducting a field test for all subjects (Reading, Math, Science, and Writing) from Oct. 1–Nov. 27, 2013.

By participating in the field test, elementary-level students and Test Administrators can gain firsthand experience using the online testing system, INSIGHT, and districts can assess their technical capacity for online testing.

Your involvement with the field test is very important in helping PDE develop successful programs and design statistically valid assessments for all students.

School and/or district personnel will use the eDIRECT Test Setup System to enroll their grade 3–5 students in the field test, create online test sessions, and print test tickets. Student groups are not required for the field test. Users must add students via file upload. The Grades 3–5 Field Test will be set up as a separate administration in eDIRECT. This system will be available on Sept. 18, 2013.

After the field test, DRC will produce student-level percentile results files for the participating sites and post them to eDIRECT.

The Classroom Diagnostic Tools are

(continued on page 2)

### In This Issue

CDT ..... page 1, 2

Keystone ..... pages 1–5

SPP ..... page 2

PSSA ..... page 2, 3

Key Dates ..... page 4



PA Customer Service  
1-800-451-7849

## Winter Keystone enrollment window opens September 9

For the 2013/2014 Winter Keystone Exams, districts will enter enrollments during the Materials Ordering Window Sept. 9–13. Enrollment counts by mode (including accommodated materials) are needed for all subjects.

A materials ordering training video is available on eDIRECT under General Information and Documents. Choose “2013/2014

Winter Keystone Exams” and Document type “Training Video.” Click the Show Documents button and choose “Materials Ordering Video.”

The Keystone Exams will be offered in online and paper/pencil testing modes for Algebra I, Biology, and Literature. Students in grade 11 who have not previously taken the Keystone

Exams are required to complete all three Keystone Exams during the 2013–2014 school year for federal accountability purposes.

The winter testing window is scheduled in two separate waves to accommodate different semester end dates in schools that have block scheduling. The

(continued on page 3)

## Remaining Dates for the 2013 Assessments

<b>Summer 2013 Keystone</b>	
Corrections Window	August 28–29, 2013
District Student Data Files Available	September 10, 2013
Summary Reports Available	September 23, 2013
ISRs arrive at Districts/Schools	September 25, 2013
Data Interaction™ Available	September 30, 2013
<b>Spring 2013 Keystone</b>	
ISRs arrive at Districts/Schools	September 5, 2013
<b>Spring 2013 PSSA</b>	
ISRs arrive at Districts/Schools	September 5, 2013
Data Interaction™ Available	September 23, 2013
Summary Reports Available	October 1, 2013

## Summer Keystone

The Online Corrections System for the 2013 Summer Keystone Exams will be available Aug. 28–29, 2013. If your LEA tested during the summer window, you are required to provide or update student demographic information (PAsecureID, Last Name, First Name, and DOB) for any student records that are not matched to PIMS. Updating these fields will typically create a match to PIMS.

The system also allows users to link student records from the 2013 Summer Keystone Exams to past Keystone test events. A student's reported score for the Keystone Exams could be a combination of the score from the current administration and any previous scores, so it is important that system users create these links to ensure that students receive the most accurate score.

## Winter Keystone (continued from page 1)

testing window for wave 1 is Dec. 2–13, 2013. The testing window for wave 2 is Jan. 8–22, 2014. A district may test all subjects during a single wave or split the subjects between waves, but a single subject cannot be tested during both waves. All schools in the district will follow the same window for security reasons.

To receive precode labels for the 2013/2014 Winter Keystone Exams, districts must utilize the October 21–25 Test Setup Window to establish paper test sessions. By placing students into paper test sessions, DRC knows that these students need precode labels to use on the paper tests.

Student information from the September 3 PIMS snapshot will be preloaded into eDIRECT. Students placed into paper test sessions during the Test Setup Window will receive Precode Labels.

A test setup training video is available on eDIRECT under General Information and Documents.

Choose the "2013/2014 Winter Keystone Exams" and the Document type "Training Video." Click the Show Documents button and choose "Test Setup Video."

The Online Corrections System on eDIRECT for the 2013/2014 Winter Keystone Exams will be available February 12–18, 2014. During this window, every LEA is required to provide or update student demographic information (PAsecureID, Last Name, First Name, and DOB) for any student records that are not matched to PIMS. Because the Keystone Exams scores are calculated as the best score over multiple administrations, the system will also allow users to link student records from the 2013–2014 Winter Keystone Exams to past Keystone Exams test events.

This testimony was prepared by Dr. Peg Luksik, a teacher with over 35 years of experience in both special education and elementary education. In graduate school, a portion of the duties required by her fellowship included working in the psychometric testing center operated at the university. In that capacity, she administered, scored and interpreted the educational assessments used to diagnose both gifted and challenged children and determine the educational programming best suited to their needs. Peg has taught at every level from preschool through college in regular classrooms, resource centers, self-contained special education classes, and in alternative educational settings. She has trained teachers in curriculum and classroom management. Peg has also written and evaluated curriculum, as well as authoring several books on education issues. She's worked for the U.S. Department of Education, where her task was to review and evaluate education reform initiatives.

We the undersigned endorse and incorporate the views expressed above as our own on the subjects stated.

Sincerely,



Rep. Stephen Bloom  
199<sup>th</sup> Legislative District



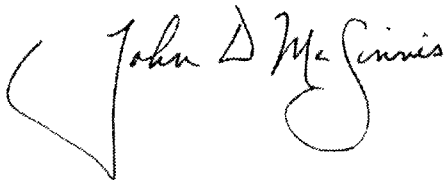
Rep. David Maloney  
130<sup>th</sup> Legislative District



Rep. Mark Gillen  
128<sup>th</sup> Legislative District



Rep. Todd Rock  
90<sup>th</sup> Legislative District



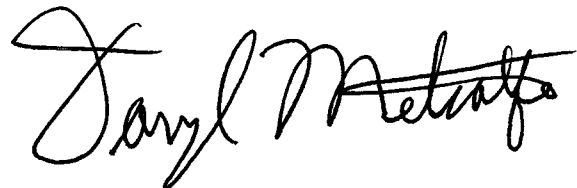
Rep. John McGinnis  
79<sup>th</sup> Legislative District



Rep. Fred Keller  
85<sup>th</sup> Legislative District



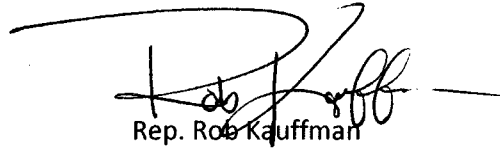
Rep. Mark Mustio  
44<sup>th</sup> Legislative District



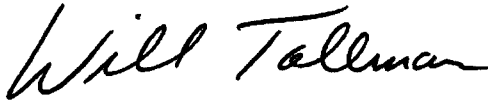
Rep. Daryl Metcalfe  
12<sup>th</sup> Legislative District



Rep. Kathy Rapp  
65<sup>th</sup> Legislative District



Rep. Rob Kauffman  
89<sup>th</sup> Legislative District



Rep. Will Tallman  
193<sup>rd</sup> Legislative District



Rep. Michele Brooks  
17<sup>th</sup> Legislative District



Rep. George Dunbar  
56<sup>th</sup> Legislative District



Rep. Mike Reese  
59<sup>th</sup> Legislative District

*Brad Roae*

Rep. Brad Roae  
6<sup>th</sup> Legislative District