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2976.

February 13, 2013

Fiona E. Wilmarth, Esq.
Director of Regulatory Review
Independent Regulatory Review Commission
333 Market Street
14th Floor
Harrisburg, Pennsylvania 17101

Re:

Background on Proposed Regulation #6-326 - Academic Standards and Assessments

Dear Fiona:

I am transmitting to you background materials that supplement the formal comments filed by the Pennsylvania Business Council (PBC). The business community generally and our organization specifically have been long-time supports of these education initiatives and their forerunners. These materials are being transmitted to all commissioners. I readily agreed to David Sumner's request to post the materials on the Commission's website.

Included are:

- A PowerPoint presentation summarizing survey data collected in May 2009 from interviews with business owners and senior managers regarding their perceptions of high school graduates work readiness and their reaction to a proposal for uniform, statewide, end-of-course exams as a graduation requirement. (This was the basis for our support of Keystones.)
- My testimony to IRRC in October 2009 on the Chapter 4 rulemaking, citing the survey research.
- My March 2012 testimony to the State Board of Education regarding their proposed amendments
 including a plan to reduce the number of Keystone Exams required for graduation and a delay in
 implementation.
- Our organization's August 2012 survey research of Pennsylvania voter attitudes regarding education, specifically Pennsylvania Common Core and Keystone exams.
- An October 2012 newsletter from our organization transmitted to 1400 business leaders, all
 Pennsylvania state and federal lawmakers, many Cabinet and Administration officials and the media
 offering background information, policy arguments, and political analysis of the Common Core and
 Common State Assessment movement.
- My November 2012 official comment to IRRC supporting the regulatory proposal.

I would be happy to meet with you, David and other staff informally to review these materials, our comments, and discuss any questions you may have. I am also available to you anytime by phone or email. Thanks for your hard work on these and the many other packages that come before the Commission.

Sincerely yours,

President & CEO



Susquehanna Polling and Research

PA WORK FORCE CLIMATE POLL OVERVIEW- MAY 2009

Survey Objectives

- Assess current attitudes towards the quality of the workforce in PA as well as both in the past and future
- Measure concern of businesses in finding qualified high school graduates
- Gauge the current perceived value of a high school diploma
- Test support for statewide requirements including common final exams and the impact they would have on the workforce
- Identify key messages and themes that most drive support/opposition to statewide requirements

Survey Methodology

- <u>Conducted</u>: May 7, 8, 11-15, 18, 2009 during business hours 8:30am to 5pm
- Sample Size: 400 PA Businesses with margin of error of +/- 4.90%
- Respondent Titles: 60% President/VP –
 2% CFO/Finance 28%
 Manager/Director 4% Other
- <u>Co. Size</u>: 58% 1-4 employees 18% 5-9
 Employees 19% 10-49 employees 5% 50+ Employees
- Industry Type: 10% Construction 23%
 Retail Trade 34% Services 33%
 Other (Agriculture, Mining,
 Manufacturing, Transportation,
 Wholesale, Finance, Other)
- Region: 5% Northwest 21%
 Allegheny/Southwest 15% "T" Central 13% Northeast 17% South Central 29% Philly/Southeast

Sampling of Companies Surveyed...

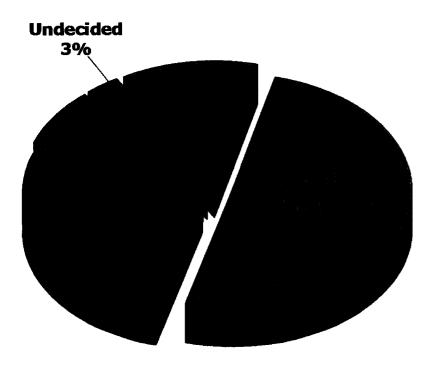
- SAPP BROS TRUCK STOPS
- APPLEBEE'S NEIGHBORHOOD GRILL
- PEP BOYS
- PONDEROSA STEAKHOUSE
- HALLSTROM CONSTRUCTION CO INC
- HAPPY PAWS PET SITTING
- DRAYER ELECTRICAL SVC LLC
- COREY'S CUSTOM CABINETRY
- WINTER LUMBER CO
- PINNACLE STORAGE SOLUTIONS
- HAMLIN AUTO PARTS
- AUNTIE ANNE'S PRETZELS
- SUNSET OPTICS
- PIZZA HUT
- SIXTH STREET DINER
- STATE STREET GRILL
- NAPA AUTO PARTS
- CITY CHECK CASHING LLC
- ALLSTATE INSURANCE CO
- PENNSYLVANIA REGIONAL BALLET
- AURORA COMPUTERS

- LEEWAY RENT-A-CAR
- CROSSROADS HOSPICE
- ROBERT J KELLY LOCKSMITH SVC
- REICHARD TAXIDERMY
- AVIS RENT A CAR
- NANCY A ROGERS, CPA
- SMARTKIDS CHILD CARE
- HIDDEN HILLS DAIRY
- MT PLEASANT LANDSCAPING
- WARRINGTON QUARRY
- MICHAEL J MOFFA ELECTRICAL
- FLURER MACHINE & TOOL CO
- FAYETTE FUR POST
- SPECTACULAR FIREWORKS USA
- LENS CRAFTERS
- TED FRANKLIN LAND SURVEY
- JOHNSON REALTY & APPRAISAL CO
- CAMERA PRO
- DEB BEE'S EMBROIDERY
- GLENDALE MEDICAL CTR
- TIMOTHY MATUSZAK DDS



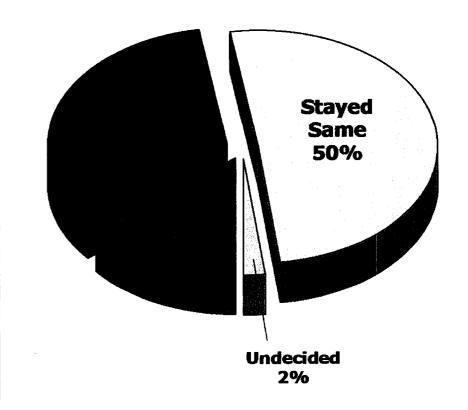
Most employers (or a combined 62%) believe the quality of the current workforce is satisfactory. However, one in three believe it's gotten worse in recent years while most are ambivalent about its future potential for positive improvement

Q2. Would you rate the quality of the workforce in Pennsylvania as excellent, good, fair or poor?



Total Excellent/Good: 62%
Total Fair/Poor: 34%

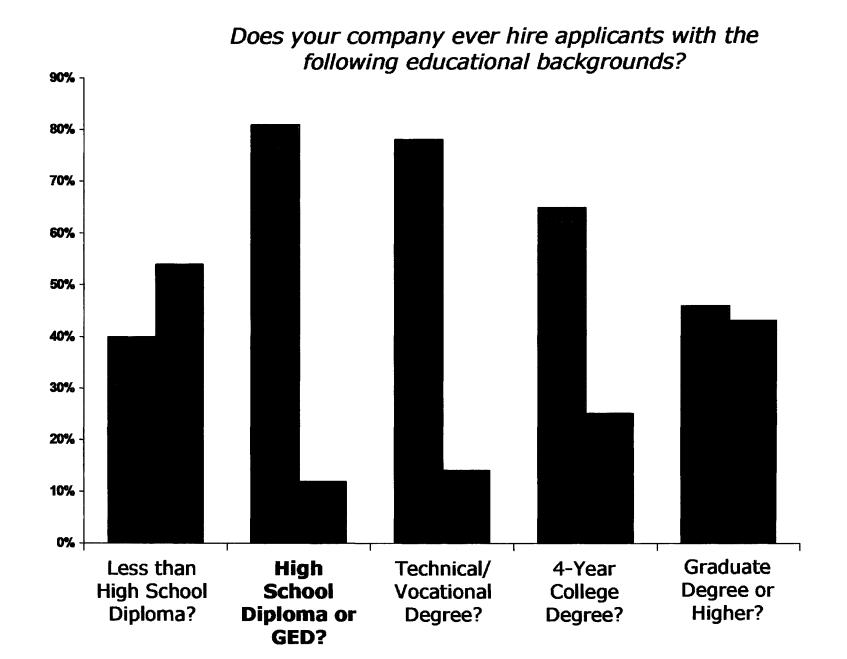
Q3. Do you think the quality of the workforce in Pennsylvania has gotten better, gotten worse or stayed about the same in recent years?



...In the next several years, 32% think the quality of the workforce will get better, 21% think it will get worse, and 39% think it will stay about the same.



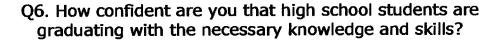
The business community's need for applicants with a high school diploma is universal across the Commonwealth since 81% of companies surveyed say they hire applicants with a maximum of a high school diploma – higher than all other types of applicants. This means all businesses benefit from a quality work force – both large and small and businesses representing all types of industries

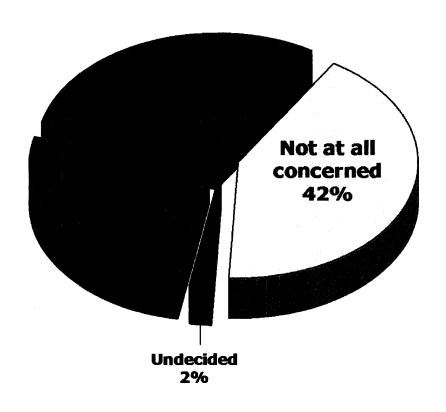




A majority of businesses (or 56%) express some level of concern about their ability to have qualified candidates at their companies. However, an equal 56% express at least some level of confidence in the skill level of today's graduating seniors which suggests that things could be a lot worse

Q5. How concerned are you about your ability to hire qualified candidates in your company?





Very confident 2%

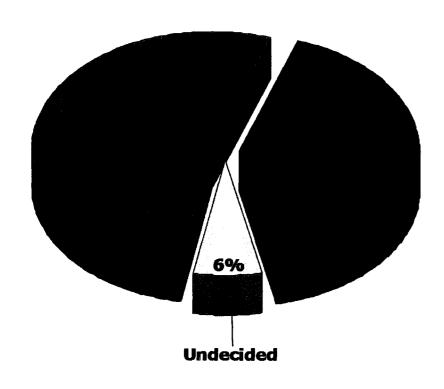
Total Very/Somewhat: 56% **Total Not at All:** 42%



Total Very/Somewhat: 63%
Total Not at All: 34%

Only a bare majority (or 52%) believe a high school diploma is a good indicator of a candidate's skill level, which suggests a fundamental perception exists among many that a diploma's practical value is marginal at best. However, perceptions on this question vary widely depending on company size and type of industry

Q7. Do you think a high school diploma is a good indicator of a candidate's competency, basic skills and knowledge?



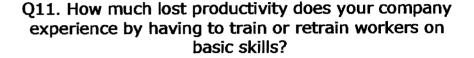
<u>Demographic</u> All Respondents	<u>Yes</u> 52%	<u>No</u> 41%
Industry Type Retail	68%	25%
Services Other	48% 47%	46% 46%
Company Size 1-4 Employees 5-9 Employees 10+ Employees	49% 54% 58%	43% 43% 35%
Hire H.S. Grads? Yes No	56% 30%	40% 52%

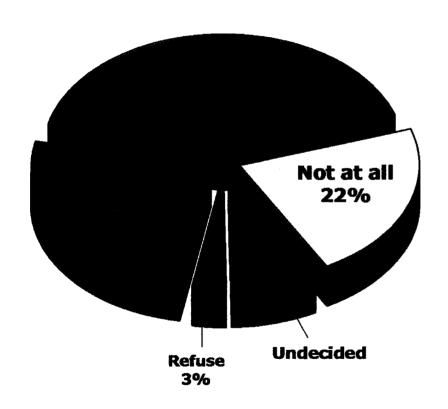
...The poll suggests that companies that do NOT currently hire applicants with a maximum of a high school diploma have a negative perception of graduating seniors since by a 52/30 margin they reject the notion that a diploma is a good indicator of skill level. This contradicts the belief held by most companies that DO hire applicants with a diploma.

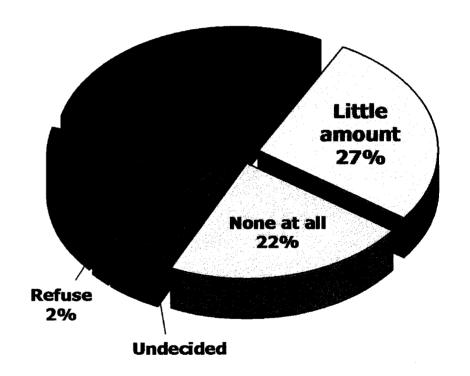


Most employers (or 68%) say they receive applications from non-qualified job-seekers, while nearly one-half (or 44%) say they suffer either a significant or moderate amount in lost productivity from having to retrain new hires on basic skills

Q9. How often do you receive applications from jobseekers who lack the skills and/or knowledge necessary?





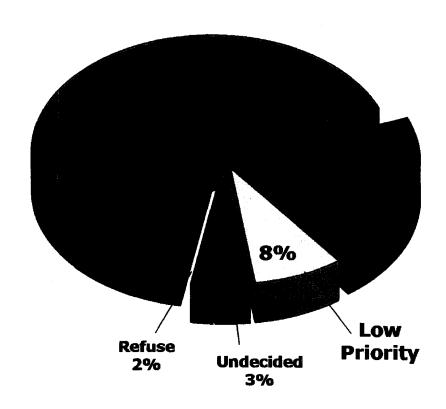


Total Very/Somewhat: 68% **Total Not at All:** 22%

SPR SUSQUEHANNA POLLING AND RESEARCH **Total Significant/Moderate:** 44% **Total Little/None at All:** 49%

Most (or 66%) think it's a high priority that new hires be able to demonstrate they have the basic skills to enter the workforce, including a majority of businesses regardless of company size or industry type. This suggests employers think it's important enough to be a "front burner" issue for the legislature

Q10. How high a priority is it to your business that new hires are able to demonstrate that they can do 12th grade level reading, math, and science skills?

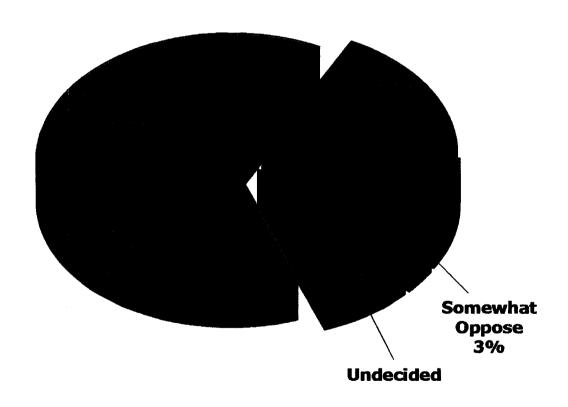


<u>Demographic</u>	<u>High</u> <u>Priority</u>	<u>Medium</u> <u>Priority</u>	<u>Low</u> <u>Priority</u>
Ali Respondents	66%	21%	08%
Industry Type			
Retail	57%	33%	07%
Services	71%	15%	07%
Other	67%	19%	10%
Size			
1-4 Employees	66%	16%	10%
5-9 Employees	75%	19%	06%
10+ Employees	59%	33%	07%



Support for new statewide requirements including common final exams (at 80%) is overwhelming and broad-based and includes strong majorities of businesses regardless of company size, type of industry or geographic location in the Commonwealth

Q12. The state recently proposed new guidelines that would require high school students to meet certain statewide requirements to prove they are proficient in basic skills by passing a series of common final exams in reading, math, science, writing and social studies in order to graduate. Do you support or oppose these new requirements?



<u>Demographic</u>	<u>Total</u> Support	<u>Total</u> <u>Oppose</u>
All Respondents	80%	12%
Company Type		
Retail	79%	12%
Services	79%	11%
Other	81%	13%
Size		
1-4 Employees	79%	14%
5-9 Employees	81%	14%
10+ Employees	82%	05%
Region		
Northwest	80%	20%
Allegheny/Southwest	84%	14%
"T" Central	81%	10%
Northeast	85%	12%
South Central	78%	07%
Philly/Southeast	76%	13%

Total Support: 80%
Total Oppose: 12%



Support for statewide requirements including common final exams...

ALLEGHENY.

- "Our education system is failing."
 Occupation: President. Type: Retail trade. Size: 5-9 employees.
 County: BUCKS.
- "I think there are too many schools that just push the kids through in order to get funding."

Occupation: President. **Type:** Retail trade. **Size:** 5-9 employees. **County:** MONROE.

 "Because every school system is different and depending on how different the school district is they will all be able to go into the workforce at the same level."

Occupation: Professional Staff. **Type:** Retail trade. **Size:** 10-19 employees. **County:** CUMBERLAND.

• "I support this because I want teachers to make sure students don't fail."

Occupation: President. **Type:** Construction. **Size:** 1-4 employees. **County:** NORTHUMBERLAND.

 "Because there are too many kids who come in here who can't read or write."
 Occupation: Vice President. Type: Construction. Size: 50-99

employees. **County:** LYCOMING.

• "I strongly support this. I know that New York has been doing this for years."

Occupation: President. Type: Services. Size: 1-4 employees. County:

- "I think it helps to address concerns about improving the workforce in Pennsylvania."
 Occupation: President. Type: Services. Size: 1-4 employees. County: CHESTER.
- "A high school degree would actually mean something."

Occupation: Professional Staff. **Type:** Manufacturing. **Size:** 100-249 employees. **County:** NORTHAMPTON.

• "Creates a standard across the board. Everyone will be on the same playing field."

Occupation: President. **Type:** Services. **Size:** 5-9 employees. **County:** ALLEGHENY.

• "I think there are students who are coming out of school who don't have basic skills."

Occupation: President. **Type:** Retail trade. **Size:** 1-4 employees. **County:** INDIANA.



Opposition to statewide requirements including common final exams...

- "I think the tests are unfair and schools will prepare the students for the test and not really teach them or let them learn."
 Occupation: President. Type: Retail trade. Size: 1-4 employees.
 County: PHILADELPHIA.
- "Because they need to start in the fifth grade with testing. Waiting until the twelfth grade is too late."

Occupation: President. **Type:** Finance, insurance, real estate. **Size:** 1-4 employees. **County:** MONTGOMERY.

 "I don't think the state should be mandating this type of thing."
 Occupation: President. Type: Services. Size: 1-4 employees.

County: SOMERSET.

- "It will cost money."
 Occupation: President. Type: Construction. Size: 5-9 employees.
 County: MONTGOMERY.
- "Teachers only prep the kids for those tests. I would support it unless it meant more government control then I wouldn't support it. They just need to update the education system rather than prep them for tests."

Occupation: President. **Type:** Wholesale trade. **Size:** 5-9 employees. **County:** DELAWARE.

- "Some kids can't take tests and although they are smart they will fail these exams."
 Occupation: President. Type: Construction. Size: 1-4 employees.
 County: VENANGO.
- "Few folks I know in education are for standardized tests."

Occupation: President. **Type:** Services. **Size:** 1-4 employees. **County:** FAYFITF.

 "It should be up to the school districts and not the state."

Occupation: Professional Staff. **Type:** Services. **Size:** 1-4 employees. **County:** ALLEGHENY.

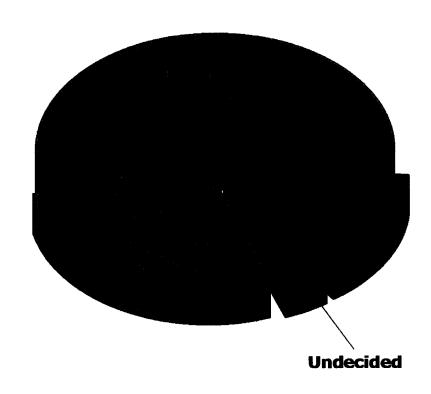
 "This will not solve the problems in our schools."

Occupation: President. **Type:** Services. **Size:** 1-4 employees. **County:** BUCKS.

 "I do not think it is a good way to educate people when teaching just for exams. We need an overhaul of the entire education system."

Occupation: President. **Type:** Finance, insurance, real estate. **Size:** 1-4 employees. **County:** BUCKS.

Q14. What impact do you think these new statewide requirements including common final exams can have on improving the quality of the workforce in Pennsylvania?

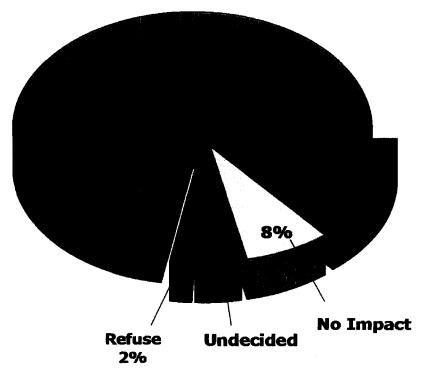


...Most believe new statewide requirements including common final exams can have at least some impact on the quality of the workforce. However, the results also suggest most don't feel it's a panacea but rather a step in the right direction towards a more qualified workforce.



The use of mandatory remedial courses for students who don't pass new common exams is the most persuasive argument. This suggests employers are looking for some level of accountability in the system. In addition, statistics showing nearly 2 in 5 graduates fail the state's reading, math and writing tests was the second most persuasive argument.

Q19. More/Less Likely (to support new common final exams): In order to graduate, remedial courses would be required for students who do not pass the new common final exams?



...The idea that students who fail the new common exams could still be held back from graduating even if they pass all their classes gives some employers pause for concern since one in three employers say they would be "less likely" to support the new common final exams.

_			
	Pro/Con Argument:	<u>More</u> <u>Likely</u>	<u>Less</u> Likely
	Q19. In order to graduate, remedial courses would be required for students who do not pass the new common final exams?	72%	14%
	Q15. Nearly 2 in 5 high school graduates failed the state's reading, math and writing tests?	71%	16%
	Q17. Pennsylvania currently has NO statewide uniform graduation requirements in place for today's public school students?	64%	19%
	Q16. Taxpayers including businesses and families spent \$26.5 million last year on remedial courses to get incoming freshmen at the state's universities and community colleges up to speed on basic skills?	63%	20%
	Q18. Students who fail these new common final exams but still pass all their classes would NOT be able to graduate?	48%	34%



Summary of Conclusions...

MOST EMPLOYERS THINK THE GENERAL QUALITY OF THE WORKFORCE IS AVERAGE OR SLIGHTLY BETTER, WHICH IS SOMEWHAT MORE OPTIMISTIC THAN POLLS IN PRIOR YEARS. THIS MAY BE EXPLAINABLE DUE TO THE FLOOD OF NEW JOB SEEKERS ENTERING THE JOB MARKET DUE TO THE ECONOMIC DOWNTURN, MANY OF WHOM WERE DOWNSIZED BY COMPANIES AND MAY BE OVERQUALIFIED FOR MANY POSITIONS CURRENTLY AVAILABLE. HOWEVER, DESPITE THE SOMEWHAT OPTIMISTIC PERCEPTIONS OF THE CURRENT WORK FORCE MANY EMPLOYERS REMAIN SKEPTICAL ABOUT ITS LONG TERM PROGNOSIS IN FUTURE YEARS.

BUSINESS' VIEWS ABOUT THE PERCEIVED VALUE OF A HIGH SCHOOL DIPLOMA VARY WIDELY, BUT GENERALLY SUPPORT THE CONCLUSION THAT A DIPLOMA HAS LIMITED VALUE AT BEST. THIS IS ONE OF THE POLL'S MOST SIGNIFICANT FINDINGS, BECAUSE IT GETS TO THE FUNDAMENTAL QUESTIONS ABOUT WHAT KIND OF ACCOUNTABILITY OUR SCHOOLS SHOULD HAVE, AND WHAT METHODS WE SHOULD USE TO EVALUATE THE SKILL LEVELS OF GRADUATING STUDENTS. THEREFORE, ANY MEDIA CAMPAIGN TO GROW PUBLIC SUPPORT FOR COMMON FINAL EXAMS SHOULD USE AS ITS BASIS THE FUNDAMENTAL POINT THAT A HIGH SCHOOL DIPLOMA HAS LOST TS VALUE. FROM A PR PERSPECTIVE, THIS IS EASY TO GRASP, HAS EMOTIONAL VALUE AND IS POWERFUL.

ALMOST ALL BUSINESSES SAY THEY HAVE NEEDS FOR APPLICANTS WITH A MAXIMUM OF A HIGH SCHOOL DIPLOMA, HIGHER THAN ANY OTHER TYPE OF APPLICANT. THIS MEANS NEEDS ARE UNIVERSAL ACROSS THE SPECTRUM AND BUSINESSES OF ALL TYPES AND SIZES HAVE A VESTED INTEREST IN THE OUTCOME OF THIS ISSUE.

SUPPORT FOR NEW STATEWIDE REQUIREMENTS INCLUDING FINAL EXAMS IS BROAD-BASED, WHICH MEANS THE ISSUE HAS WIDESPREAD APPEAL AMONG ALL TYPES AND SIZES OF BUSINESSES AND IN ALL GEOGRAPHIC REGIONS OF THE STATE. PLUS, THE VERBATIM RESPONSES AMONG SUPPORTERS SHOW THAT MANY BELIEVE THEY CAN HAVE A REAL IMPACT ON IMPROVING THE QUALITY OF THE WORKFORCE. HOWEVER, THE POLL ALSO SUGGESTS MOST DO NOT THINK COMMON FINAL EXAMS WILL BE THE PANACEA, BUT RATHER A STEP IN THE RIGHT DIRECTION AND PART OF A MORE COMPREHENSIVE SOLUTION. THIS IS IMPORTANT BECAUSE IT MEANS SUPPORT FOR COMMON EXAMS CAN'T BE "OVERSOLD" TO LAWMAKERS OR THE PUBLIC, PARTICULARLY GIVEN THE FACT THAT THE BUSINESS COMMUNITY GIVES AVERAGE OR EVEN SLIGHTLY BETTER MARKS TO THE CURRENT QUALITY OF THE WORK FORCE.

MOST BUSINESSES THINK IT'S A HIGH PRIORITY FOR THEM TO BE ABLE TO HIRE APPLICANTS THAT HAVE AN ADEQUATE LEVEL OF SKILLS, SO THE POLL SHOWS THAT DESPITE MIXED ATTITUDES ON THE STATUS OF THE CURRENT WORK FORCE THERE IS SOME SENSE OF A "SOONER RATHER THAN LATER" MENTALITY AMONG EMPLOYERS.

BUSINESSES RESPOND DIFFERENTLY TO VARIOUS TYPES OF MESSAGES BASED ON THE SPECIFIC ASPECTS OF THE NEW GUIDELINES, BUT THE MOST PERSUASIVE MESSAGE TESTED WAS THE REQUIREMENT TO USE REMEDIAL COURSES FOR THOSE WHO DO NOT PASS THE COMMON EXAMS. THIS SEEMS TO ADD ACCOUNTABILITY TO A GENERAL SYSTEM OF PUBLIC EDUCATION THAT MANY BELIEVE HAS BROKEN DOWN. HOWEVER, EMPLOYERS ALSO WANT TO SEE SOME LEVEL OF FLEXIBILITY AND COMMON SENSE IN THE SYSTEM WHERE COMMON EXAMS CAN WORK AS A COMPLEMENT OR CHECKS AND BALANCES WITH OTHER TYPES OF TESTS.



THANK YOU FOR YOUR TIME AND ATTENTION!



Pennsylvania Business Council

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Testimony of David W. Patti President & CEO, Pennsylvania Business Council October 22, 2009

Academic Standards and Assessment, IRRC Number 2696

Good morning. I appreciate the opportunity to address the Commission today on behalf of the nearly 50 CEOs and senior executives who make up the Policy Roundtable of the Pennsylvania Business Council. I am here today to convey our strong support for the State Board of Education's final rulemaking for Academic Standards and Assessment (IRRC number 2696) and to urge the Commission to approve the rulemaking for final publication and promulgation.

The Pennsylvania Business Council envisions a Commonwealth in which residents enjoy a very high quality of life in sustainable communities, where those who are seeking employment find high quality jobs with good compensation, and where those who invest their capital and hard work can grow firms that flourish and are profitable. The PBC Policy Roundtable, like its national counterpart in Washington, is a forum in which CEOs meet on a peer-to-peer basis to formulate public policy proposals to the most pressing issues of competitiveness. The Policy Roundtable provides senior managers the opportunity to interact extensively with policymakers, policy experts, media, and other stakeholders; participate in policy evaluation; vote on long-term public policy strategy; and guide policy education/advocacy efforts.

We believe improving Pennsylvania's education and job readiness programs are essential steps to make Pennsylvania more competitive and more able to retain and attract family sustaining employment opportunities.

This final rulemaking has become best known for one element of a very comprehensive effort to improve the knowledge and skills of Pennsylvania's high school graduates — the "Keystone Exams." While the exams are integral to the effort, they are not the whole of the effort. I hope the Commission will pay attention to and consider the totality of the proposal, and the care and sensitivity that has gone into its drafting and redrafting as public comment was considered and accommodated.

The genesis of this final rulemaking was not a hasty concoction of fads and new ideas, but in many ways a continuation of the work on standards and "outcomes based education" that Pennsylvania began in previous Administrations. Our previous work was integrated and synthesized with recommendations from the Governor's Commission on College and Career Success. I am very proud to say that the business representatives among the Commission members were all employees of Pennsylvania Business Council member firms. Other members and my predecessor were among the persons that contributed on the work teams of the Commission. But also among the members of the Commission and the work teams were high school teachers, career technology center teachers, principals, counselors, school administrators, and school board members.

Much of the work of the Governor's Commission was based on a clear understanding that the world has changed. There are very few opportunities for family sustaining employment in unskilled labor. Gone are the days of the mills when a high school diploma and middling proficiency in reading, writing, and arithmetic interfered little with the ability to earn a generous paycheck. In today's global economy, hard skills and the ability to work with information are essential to success. Today, two-thirds of all jobs require some post-secondary education. And in those remaining "unskilled" positions where competition is fierce, competency in basic high school subject areas is required.

The PBC Policy Roundtable has been engaged in the development of this final rulemaking for well over a year. In the spring of 2009, the Roundtable directed our affiliated PBC Education Foundation to conduct non-partisan survey research into the views and perceptions of Pennsylvania business owners and managers regarding this subject. On our behalf, Susquehanna Polling & Research conducted telephone interviews with 400 Pennsylvania businesspersons. Of the interviewees, 60 percent had the job title "President" or "Vice President;" two percent were the "CFO" or "Director of Finance;" 28 percent were a "Manager" or "Director." Employment at the firms was diverse: 58 percent had 1-4 employees; 18 percent had 5-9 Employees; 19 percent had 10-49 employees; and five percent had 50 or more employees. Industries represented in the interviews included Construction, Retail Trade, Services, Agriculture, Mining, Manufacturing, Transportation, Wholesale, and Finance. The interviewees were proportionately representative of Pennsylvania's population centers: five percent from the Northwest; 21 percent from Allegheny/Southwest; 15 percent from the Central Pennsylvania "T"; 13 percent from Philadelphia/Southeast.

The survey research found:

- Only seven percent of interviewees were "very confident" that high school students are graduating with the necessary knowledge and skills.
- Only 14 percent of interviewees thought the quality of Pennsylvania's workforce has improved in recent years. Half think it has stayed the same and 33 percent think it has gotten worse.
- 56 percent of interviewees are "somewhat concerned" or "very concerned" about their ability to hire qualified candidates for their companies.
- Only 53 percent of interviewees thought "a high school diploma is a good indicator of a candidate's competency, basic skills, and knowledge."
- 80 percent of interviewees were "strongly" or "somewhat" supportive of "new guidelines that
 would require high school students to meet certain statewide requirements to prove they are
 proficient in basic skills by passing a series of common final exams in reading, math, science,
 writing, and social studies in order to graduate."

The verbatim answers and comments our pollster captured are telling:

"Our education system is failing."

Occupation: President. Type: Retail trade. Size: 5-9 employees. County: BUCKS.

"I think there are too many schools that just push the kids through in order to get funding."

Occupation: President. Type: Retail trade. Size: 5-9 employees. County: MONROE.

"Because every school system is different and depending on how different the school district is they will all be able to go into the workforce at the same level."

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"I support this because I want teachers to make sure students don't fail."

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"I think it helps to address concerns about improving the workforce in Pennsylvania."

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"Creates a standard across the board. Everyone will be on the same playing field."

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"I think there are students who are coming out of school who don't have basic skills."

Occupation: President. Type: Retail trade. Size: 1-4 employees. County: INDIANA.

As I commented earlier, there is much more to this final rulemaking than exams:

This proposal does not have to become an unfunded mandate for our school districts. Accompanying the rulemaking is a plan to provide model curricula and learning support materials for schools to use in classrooms. And, when the Keystone Exams replace the PSSAs for purposes of federal No Child Left Behind demonstrations of achievement, our schools will have 18 hours less of testing in the school year – time that can be devoted to learning.

Of course, Pennsylvania prides itself on a long tradition of local control in education and government. This proposal preserves that local control allowing districts to develop their own curricula and materials and even empowering our school districts the option to develop their own end-of-course exams subject to approval of a board made up of state and local representatives.

Most importantly, this proposal is student-centered. The "end of course exams" are simply a "final" that would be normal at the completion of most classes today – the only difference being that the "final" will be identical in most Pennsylvania school districts assuring better accountability. Frankly, our members were struck by the simple, layperson's, commonsense perception that end-of-course exams avoid the stress and pressure of a "high stakes" single test battery as a threshold for graduation.

Pennsylvania Business Council Academic Standards & Assessment, IRRC # 2696 Page 4

This proposal requires immediate remedial help for students who fail portions of any exam and gives them the chance to re-take any tests they fail. The final rulemaking ensures accommodations for special needs students and English-as-a-Second-Language (ESL) students. And, sensitive to the observation that some students simply don't perform well on standardized tests, the State Board of Education would, in the final rulemaking, allow students, with district approval, to use an academically rigorous project to show mastery of subject as an alternative to the exams.

Detractors of the proposal have hit upon exams as an easy target. Perhaps it's because few people enjoy taking tests.

Professional educators know this, so a decade ago we adopted the semantic device "assessments."

Regardless of the word choice, we are talking about an assurance that a person has the requisite training skills and abilities before we give them the privilege and the responsibility to move on to a desired activity. Exams or assessments provide accountability.

We require a driver's exam before allowing a Pennsylvanian to drive an automobile on our roads. We do this to ensure their safety and the safety of other drivers and passengers.

We require accountants to pass their Certified Public Accountants exams before allowing them to sign audits, financial statements, and tax documents. We do this to protect investors, depositors, creditors, and our public treasury.

We require would-be attorneys to pass their Bar Exams before they practice law in our courts. We do this to ensure the rights of plaintiffs and the rights of defendants to all the benefits of due process and justice.

This rulemaking proposes to require Pennsylvania high school students to pass competency exams in core subject matter prior to high school graduation. The State Board of Education proposes to do so in order to protect post-secondary schools, employers, and the students themselves from moving on to new pursuits without adequate training and preparation. The Pennsylvania Business Council supports this important effort to provide better accountability.

The PBC Policy Roundtable is well aware of the questions and controversies that have arisen through the formulation and debate of this final rulemaking. The PBC Policy Roundtable has been consistently impressed by the willingness of the State Board of Education to gather input and learn from constructive criticism. The PBC Policy Roundtable believes that many very positive accommodations and modifications have been made to the final rulemaking.

The PBC Policy Roundtable acknowledges that there are still implementation issues to be addressed as the rule and the programs it anticipates are developed and readied for public use. The members and staff of the Pennsylvania Business Council, the PBC Policy Roundtable and the PBC Education Foundation stand ready to partner with State board of Education members, Department of Education personnel, teachers, parents, and other interest groups to make this rule and the ensuing programs a complete success.

Pennsylvania Business Council
Academic Standards & Assessment, IRRC # 2696
Page 5

Continuing discussions regarding implementation issues, however important, should not impede consideration of the final rulemaking and final promulgation.

At an October 15, 2009 meeting in Pittsburgh, the PBC Policy Roundtable voted unanimously on a formal position of support for the final rulemaking and instructed me to communicate that support to the Commission.

We believe this regulation is in the best interests of a more competitive Pennsylvania, a more prepared workforce, and – most importantly – the education our young citizens.

We believe that this final rulemaking meets all of the relevant tests:

- It is within the spirit, intent, and parameters established by the authorizing statute.
- The economic and fiscal impacts are understood and provided for, and, in fact, the final rulemaking would, we believe, be viewed very favorably in light of a comprehensive cost-benefit analysis.
- The final rulemaking is feasible, reasonable, and clear.

The Policy Roundtable of the Pennsylvania Business Council urges the Commission to approve the final rulemaking.

Thank you.

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Testimony of David W. Patti, President & CEO Pennsylvania Business Council

Proposed Amendments to Chapter 4 - Keystone Exams

March 14, 2012

Good morning. I appreciate the opportunity to address the Chapter 4 Committee of the State Board of Education today on behalf of the more than 50 senior executives who make up the Policy Roundtable of the Pennsylvania Business Council.

I am here today to convey our concern over the proposed rulemaking that would amend the Academic Standards and Assessment and to urge the Committee to reconsider the deletion of Keystone Exam requirements in core academic competencies.

The Pennsylvania Business Council envisions a Commonwealth in which residents enjoy a very high quality of life in sustainable communities, where those who are seeking employment find high quality jobs with good compensation, and where those who invest their capital and hard work can grow firms that flourish and are profitable. The PBC Policy Roundtable, like its national counterpart in Washington, is a forum in which CEOs meet on a peer-to-peer basis to formulate public policy proposals to the most pressing issues of competitiveness. The Policy Roundtable provides senior managers the opportunity to interact extensively with policymakers, policy experts, media, and other stakeholders; participate in policy evaluation; vote on long-term public policy strategy; and guide policy education/advocacy efforts.

We believe improving Pennsylvania's education and job readiness programs are essential steps to make Pennsylvania more competitive and more able to retain and attract family sustaining employment opportunities.

In 2009, the PBC Policy Roundtable voted formally to endorse and actively support implementation of the Keystone Exams. This decision was not made lightly. Moreover, this decision was made in the face of opposition from many political friends. Our organization believed then as we believe now that our students must perform better. We believe that common core standards and a common end-of-course assessment are principal drivers of better student achievement and performance.

PBC's position is based, in part, on research we produced with support from the Gates Foundation. In the spring of 2009, our affiliated PBC Education Foundation conducted non-partisan survey research into the views and perceptions of Pennsylvania business owners and managers regarding this subject. Four hundred Pennsylvania businesspersons – owners, presidents and very senior managers – were interviewed by telephone. Industries represented in the interviews included Construction, Retail Trade, Services, Agriculture, Mining, Manufacturing, Transportation, Wholesale, and Finance. The interviewees were proportionately representative of Pennsylvania's population centers.

The survey research found:

- Only seven percent of interviewees were "very confident" that high school students are graduating with the necessary knowledge and skills to perform well in the workplace.
- Only 14 percent of interviewees thought the quality of Pennsylvania's workforce had improved in recent years. Half thought it had stayed the same and 33 percent thought it had gotten worse.
- 56 percent of interviewees were "somewhat concerned" or "very concerned" about their ability to hire qualified candidates for their companies.
- Only 53 percent of interviewees thought "a high school diploma is a good indicator of a candidate's competency, basic skills, and knowledge."
- 80 percent of interviewees were "strongly" or "somewhat" supportive of "new guidelines that
 would require high school students to meet certain statewide requirements to prove they are
 proficient in basic skills by passing a series of common final exams in reading, math,
 science, writing, and social studies in order to graduate."

Our position in support of the Keystone Exams was not unique to large employers, but shared by all types of employers in all parts of Pennsylvania.

There are several amendments to the proposed rulemaking that really strengthen the initiative and which should be applauded: requiring students to participate in supplemental studies *until* they demonstrate proficiency and putting new limitations on the eligibility of 12th graders who might elect to attempt a project-based assessment are laudable improvements.

As originally promulgated by the Board of Education and approved by IRRC, graduating students would have had to pass Keystone Exams in 6 out of 10 subjects ranging from English composition and literature, to algebra 1 and 2, geometry, sciences, including biology and chemistry, and history and civics. As supporters of the original concept to assure competency in core subjects, we are concerned about the proposal to reduce the number of Keystone Exams from ten to three. We feel that reducing the breadth of knowledge covered by the assessments fails to assure our students' success in today's society.

We feel particularly strongly about the proposal to delete a Keystone Exam for English composition. There is no skill more important in the 21st century workplace – or for that matter, in civil society – than the ability to communicate effectively in writing to peers, supervisors, and others. While the assessment of composition skills is a bit more difficult, and certainly more resource intensive, it is a key component of ensuring that our young people are career and post-secondary education ready when they graduate from high school.

We also disagree with the decision to eliminate the use of Keystone Exams as the "final" exam in a class. We appreciate that teachers and students believe too much time is devoted to assessments and preparation for assessments. This is a valid complaint. Dual use of the Keystone Exam as a "final" makes better use of our education resources, maximizes teaching time, and reduces stress on students and their parents.

The PBC is not insensitive to the reason for proposing the rulemaking. We are fully aware of the Commonwealth's tight fiscal condition and the need to contain state spending in these tough economic times. We applied Governor Corbett's fiscal discipline.

Nonetheless, we remain adamant that students who receive a Pennsylvania high school diploma can actually read and write at an appropriate level, possess basic math and science skills, understand basic principles of our country's government, and appreciate our nation's history.

Our nation's young people are amassing alarmingly high amounts of debt in attempts to earn degrees from institutions of higher learning. Among the contributors to this debt is the need to spend enormous sums of personal – not to mention public funds – on remedial education. This remedial education before beginning college level classes means gaining the knowledge that was should have been gained in high school, and was supposedly certified by the award of a diploma.

If Pennsylvania students are not proficient in core academic studies including language skills, math, science, history, and civics; then we must identify their weaknesses upon course completion, provide immediate supplemental and remedial education assistance, and re-assess their achievement to ensure success in future endeavors.

If it is not economically feasible to develop all ten exams already provided for, PBC is willing to consider changes to the regulations which would ensure that graduating seniors possess basic competencies in key subjects while at the same time taking into consideration the Department of Education's need to reduce the cost of developing and implementing these exams.

We offer several recommendations enumerated below:

Various sections and references

The proposed rulemaking would substitute "English Language Arts" for references to "Reading, Writing" and references to "English composition, literature." It's not clear to us from the available materials what defines "English Language Arts," but would much prefer that me make it clear that English composition skills are absolutely required, and proficiency in literature an important element of a complete education and preparation for life-long learning.

§ 4.24(c) Requirements beginning in the 2016-2017 school year.

The proposed rulemaking would eliminate this subsection. PBC disagrees, but would accept a proposal to give the Commonwealth more time to implement this subsection. Given that other amendments extend deadlines, by two years, it would not seem inappropriate to extend this deadline by two years meaning the subsection would now read:

(c) Requirements beginning in the [2016-2017] <u>2018-2019</u> school year. Effective with the [2016-2017] <u>2018-2019</u> school year, History and Civics and Government (Appendix C) are added to the academic standards listed in subsection (b)(1)(iv) regarding requirements beginning in the [2014-2015] <u>2016-2017</u> school year. Requirements listed in subsection (b)(1)(iv)(A) must include a determination of proficiency in both English Composition and Literature; two of three Mathematics (Algebra I, Geometry, Algebra II), one of two Sciences (Biology or Chemistry), and one of three Social Studies (American History, Civics and Government or World History).

§ 4.51(f) State Assessment system

This subsection, as proposed, reduces the number and variety of Keystone Exams that would be developed. PBC believes all the assessments should be developed, but would certainly understand that additional time is needed for development. We understand that five exams are developed or well underway, while the five remaining exams still require a good deal of work. We suggest a simple division, such as:

- (f) The Department will develop or cause to be developed Keystone Exams as follows:
- (1) [Three] Five assessments by the start of the 2014-2015 school year
- (i) one aligned with the Mathematics standards, contained in Appendix A, that assesses the academic content traditionally included in Algebra I;
- (ii) two aligned with English Language Arts standards, contained in Appendix A, that assess the academic content traditionally included in high school literature and English composition courses; and
- (iii) one aligned with select standards for Science and Technology and Environment and Ecology, contained in Appendix B, that assesses academic content traditionally included in high school level biology courses; and
- (iv) one aligned with select History and Civics and Government standards, contained in Appendix C, that assesses the academic content traditionally included in high school level civics and government courses.
- (2) Five assessments by the start of the 2016-2017 school year
- (i) two aligned with the Mathematics standards, contained in Appendix A, that assess the academic content traditionally included in Algebra II and Geometry;
- (ii) two aligned with select History and Civics and Government standards, contained in Appendix C, that assess the academic content traditionally included in high school level American history and world history, courses; and
- (iii) one aligned with select standards for Science and Technology and Environment and Ecology, contained in Appendix B, that assesses academic content traditionally included in high school level chemistry courses.
- (11) Keystone Exams in the following subjects will be developed by the Department and will be made available for voluntary use by school districts and AVTSs (including charter schools) in accordance with the following schedule:

Fall 2014	Algebra i
	Civics and Government
	English Composition
	Literature
	Biology
Fall 2016	Algebra II
	Geometry
	United States History
	Chemistry
	World History

Nothing in this section shall preclude the Department from developing and making available individual Keystone Exams at a date earlier than the deadlines prescribed above.

- " 0044

Testimony of David W. Patti, Pennsylvania Business Council Page 5 of 5

PBC pledges its support and partnership to the State Board, the Pennsylvania Department of Education, and other stakeholders to resolve challenges to developing a meaningful assessment system while at the same time recognizing the harsh fiscal realities in which we find ourselves. We believe it is in the mutual interests of all Pennsylvanians to implement the Keystone Exams as originally conceived with pragmatism and economy.

Thank you for the opportunity to comment on the proposed regulation. I am willing to answer any questions you might have at this time.

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Baseline Survey of Voter Attitudes about Education in Pennsylvania with focus on CCSS and CSA

Survey of 600 randomly selected registered PA voters by The Tarrance Group with "live" telephone interviews conducted August 13-16, 2012. Margin of error is +/4.1 percent.

THE TARRANCE GROUP



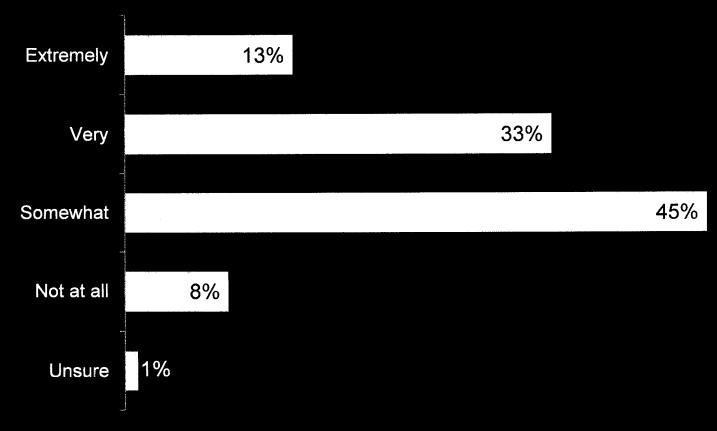
Overview

- Voters dissatisfied with education system and don't feel much better about their own school district.
- Still need to focus on best teachers, plus parent involvement
- No existing consensus on solution, but...
 - Universal agreement (83%) that same standards should be taught in every part of PA
 - Strong support (70%) for having every student pass a common exam of core material
 - Universal belief (84%) that a more rigorous public school curriculum would better prepare students
- Current awareness of Common Core Standards for K-12 education is low (20%)
- Common Core Standards begin with 68% support as a concept

THE TARRANCE GROUP



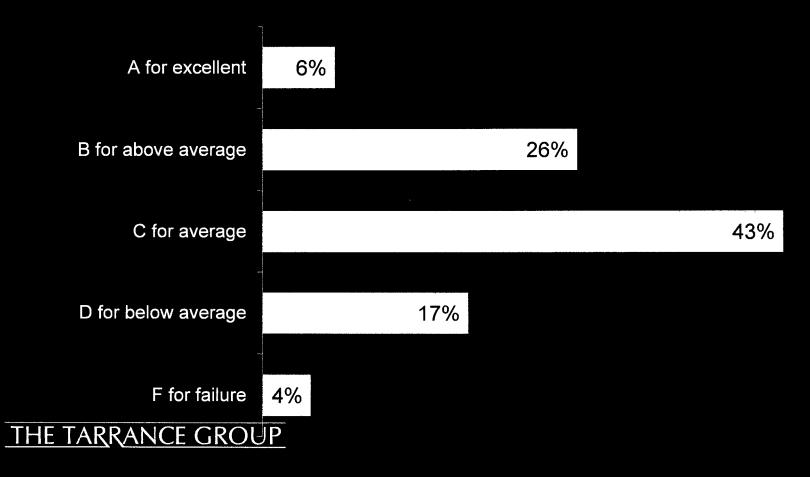
Would you say that you are extremely, very, somewhat, or not at all familiar with public education issues in the state?



THE TARRANCE GROUP



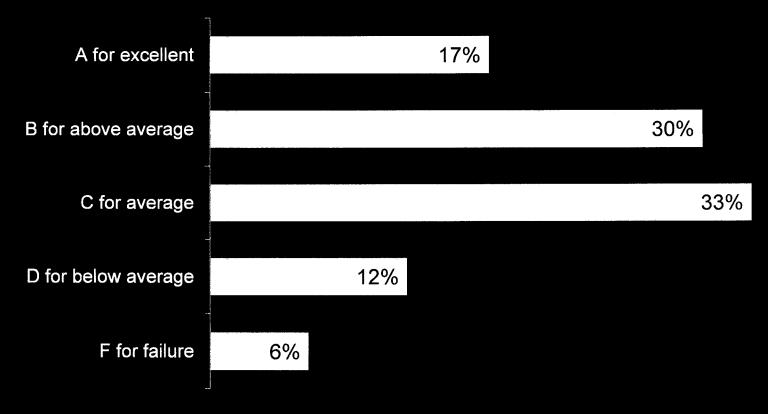
If you had to give a letter grade to the public education system here in PA, which of the following grades would you award the public education system?



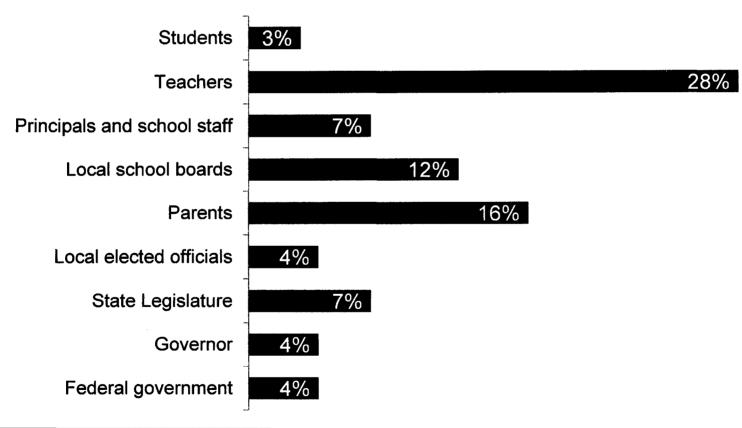


If you had to give a letter grade to your local public school or schools in your neighborhood, which of the following grades would you award that school or schools?

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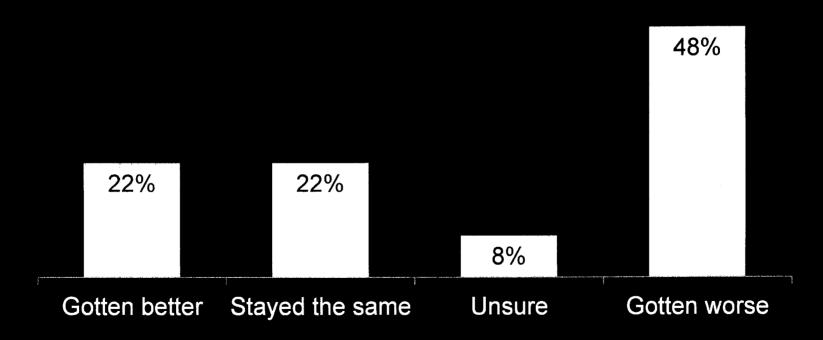


Which one of the following do you think is most responsible for making public schools here in PA the best they can be? Is it...?

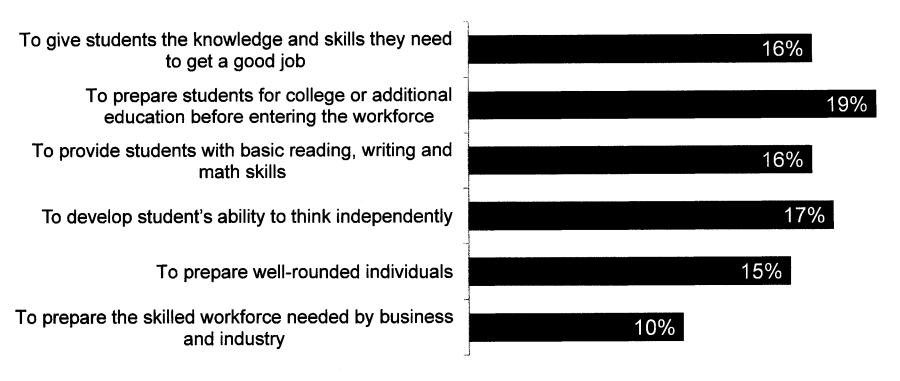




In your opinion, in the last ten years, has public education in the state of PA gotten better, stayed the same, or gotten worse?

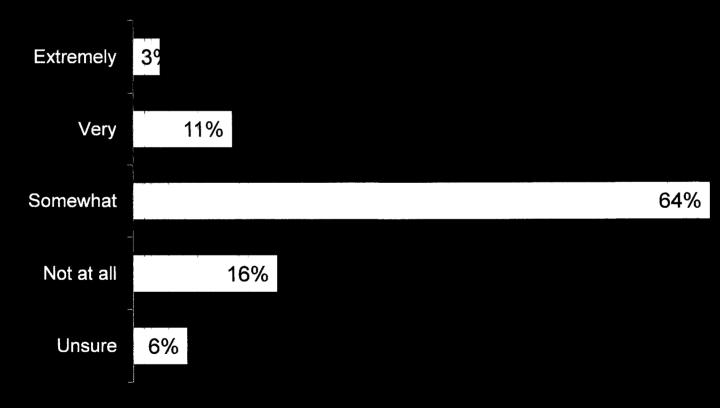


Thinking about the public education issue – I would like to read you a list of goals for public education that some people from PA have said are important. Please listen as I read the list and tell me which one issue you think is most important.



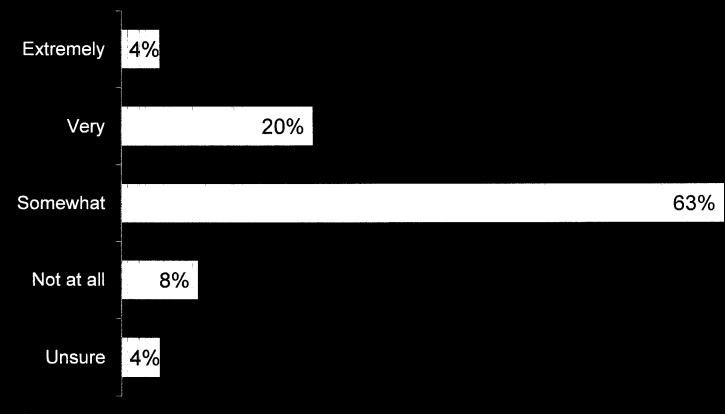


Would you say that recent graduates of PA's public schools are extremely, very, somewhat, or not at all prepared to get and succeed in a job right out of high school?



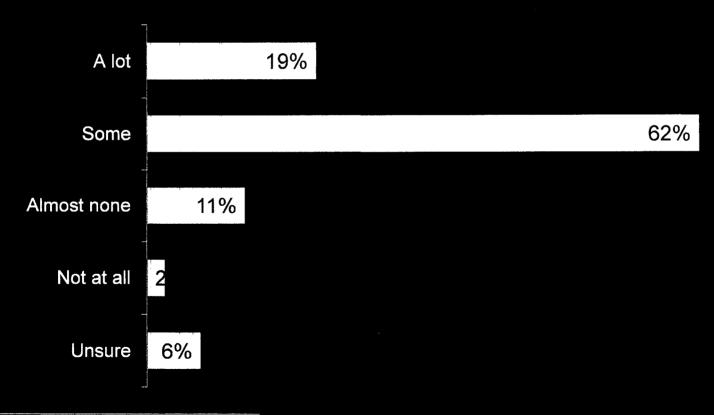


Would you say that recent graduates of PA's public schools are extremely, very, somewhat, or not at all prepared to go on to college or additional academic training right out of high school?





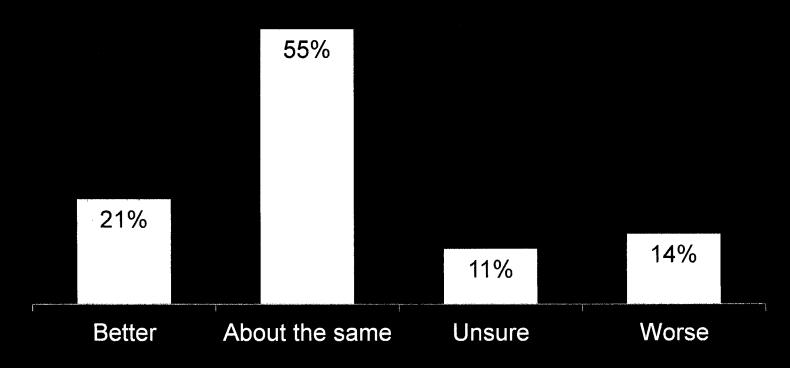
How much remedial training would you say that average recent graduates of a public school in PA might need after graduating? Is that a lot, some, almost none, or not at all?



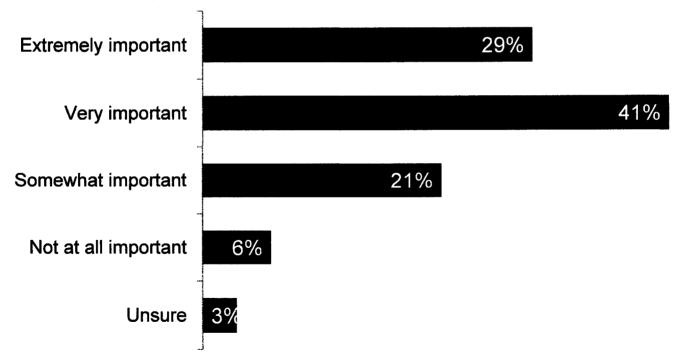


In your opinion, compared to other states, is public education in the state of PA currently better, about the same, or worse?

(Asked of Half Sample)

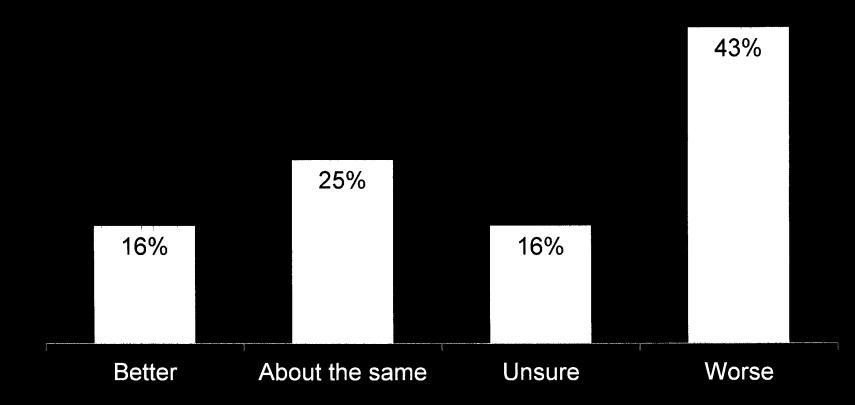


How important is it to you that the public education system here in PA compare favorably to the public education systems of other states? Is it extremely important, very important, somewhat important, or not at all important? (Asked of Half Sample)

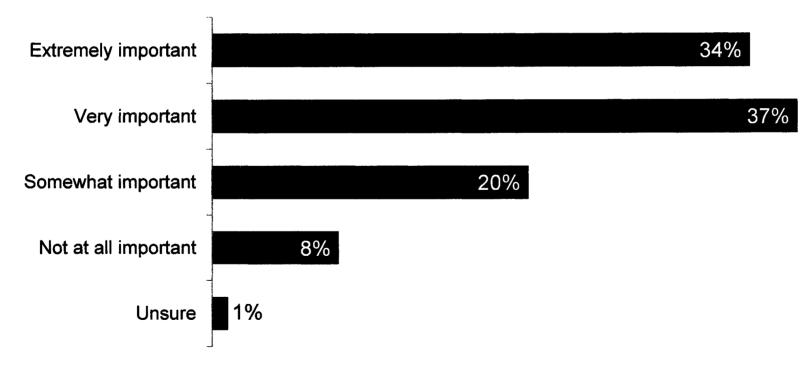




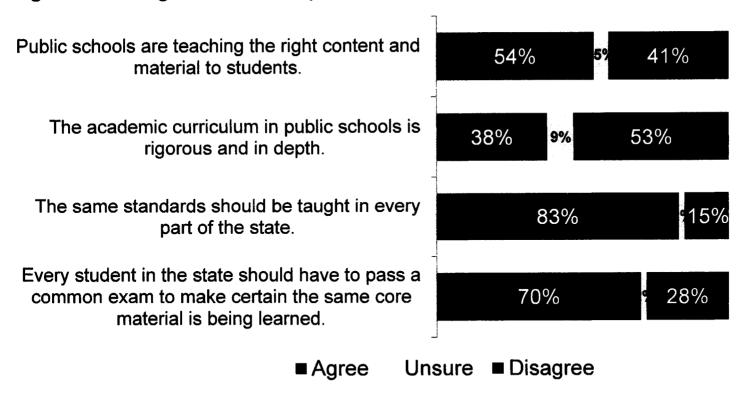
In your opinion, compared to other countries outside of the United States, is public education in the state of PA currently better, about the same, or worse? (Asked of Half Sample)



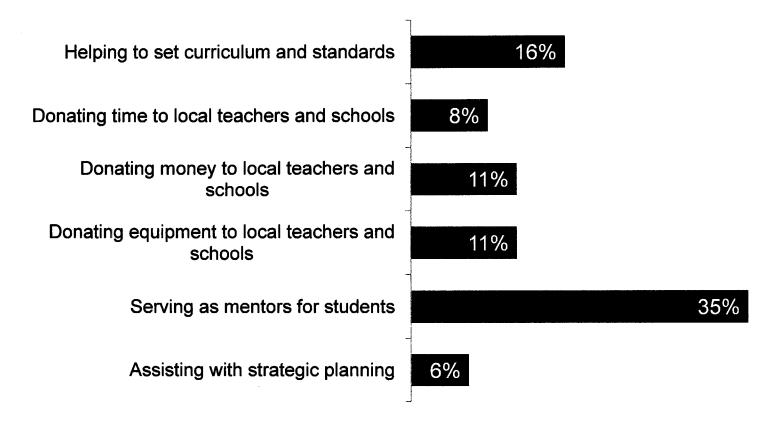
How important is it to you that the public education system here in PA compare favorably to the public education systems of other countries outside the United States? Is it extremely important, very important, somewhat important, or not at all important? (Asked of Half Sample)



Now, I would like to read you a list of statements about public education here in PA. Please listen carefully as I read each statement and tell me if you would agree or disagree with that particular statement.



And in your opinion, what is the best way for businesses to be involved in public education?



Now, I would like to read you another list of statements that some people have made about public education here in PA. Please listen carefully as I read each statement and tell me if you would believe or do not believe that particular statement.

TO SECURITION OF THE PARTY OF T

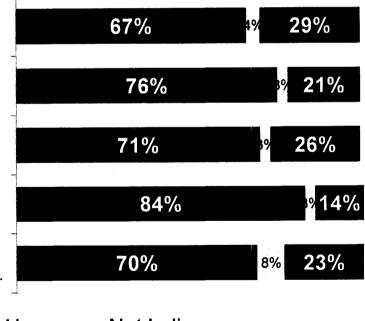
A more rigorous public school curriculum would make students better citizens.

A more rigorous public school curriculum would better prepare students to get their first job.

A more rigorous public school curriculum would turn students into life-long learners.

A more rigorous public school curriculum would better prepare students to go to college.

More than one-third of high school graduates in this state need remedial training before they...

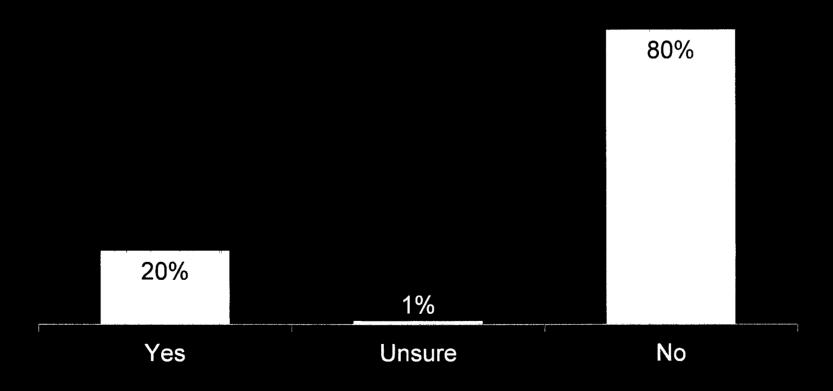


■ Believe

Unsure ■ Not believe



Have you seen, read or heard anything about an initiative called the Common Core State Standards for K thru 12 education?



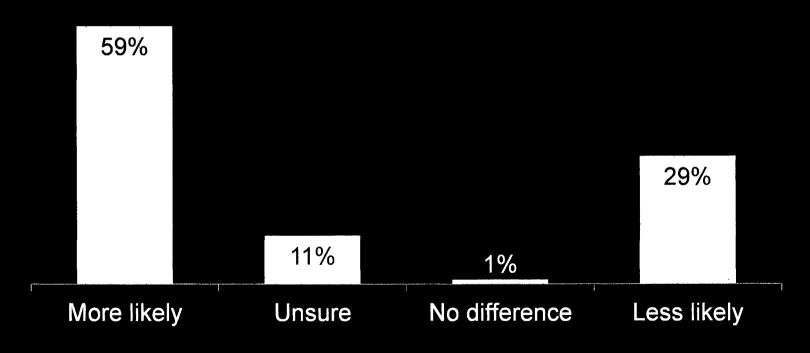


And, being as specific as you can, what have you seen, read or heard about an initiative called the Common Core State Standards for K thru 12 education? (If "YES" in Q25, Asked of N=118 Respondents, or 19.7% of Sample)

Q26-1 Open-Ended Responses	Percent (%)
Standardizing learning, one curriculum, all at same level, upgrade standards	27.3
Unsure	16.5
Testing - take a test, demonstrate learning across subjects	14.2
SRH - online, internet, email, newspaper, radio	11.9
General opposed, negative comment about standardizing	9.7
General favor, trying to improve education	8.8
Have adopted standards for the state	4.2 3
Other	3.7
Works for school/district	3.3
Refused	0.3

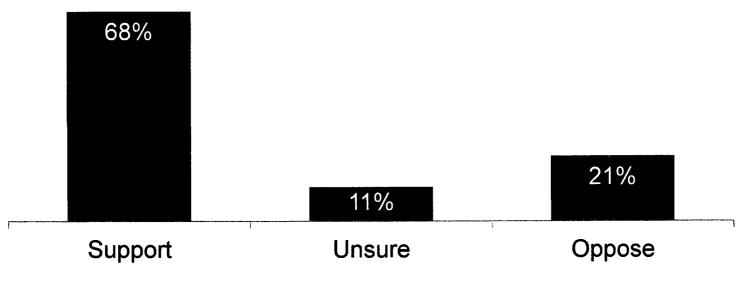


Thinking about what you have seen, read or heard about the initiative called the Common Core State Standards for K thru 12 education, has it made you more likely or less likely to support this initiative? (If "YES" in Q25, Asked of N=118 Respondents, or 19.7% of Sample)



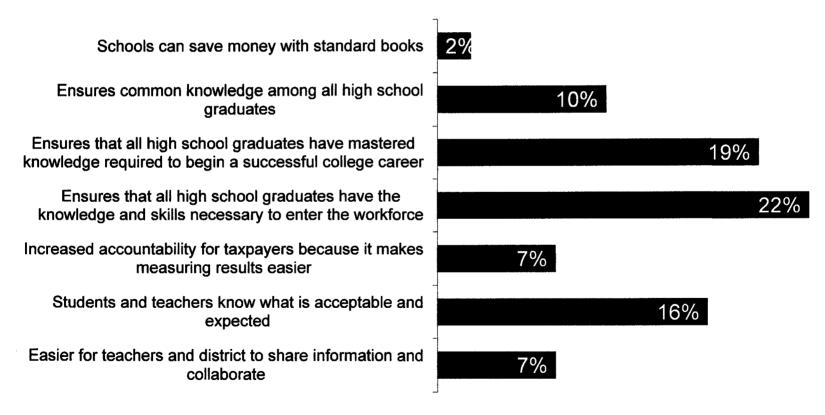


As you may be aware, a Common Core State Standard has been adopted in PA. This standard defines what all PA students should know in each grade, testing students on a yearly basis, and holding schools accountable for results. Do you support or oppose a Common Core State Standards defining the curriculum for all students here in PA?

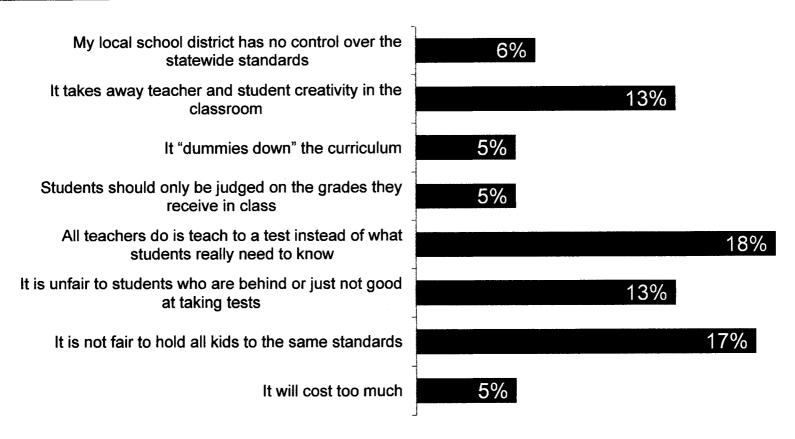


In your opinion, what is the biggest advantage for having statewide academic standards at every grade level:

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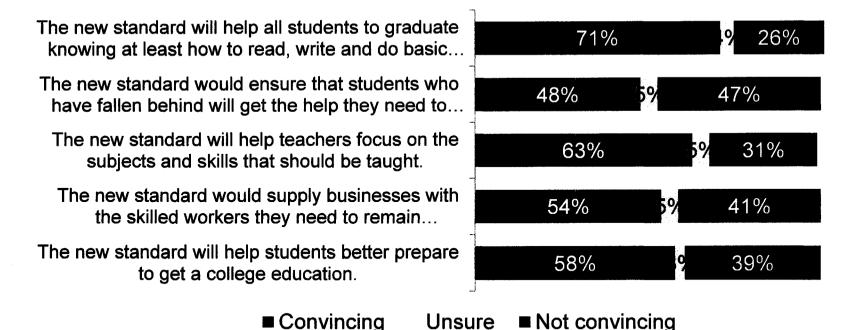


And in your opinion, what is the biggest disadvantage for having statewide academic standards at every grade level:

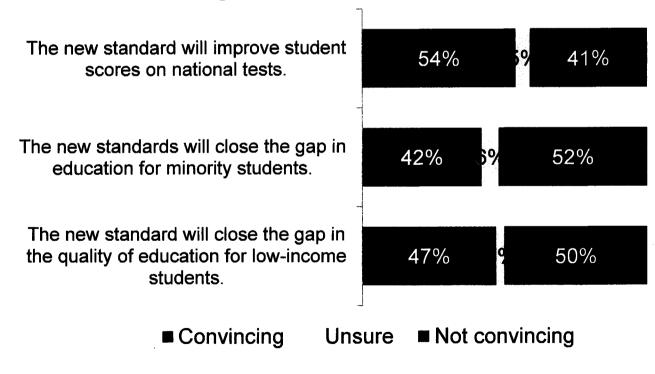


Now I would like to read you a list of statements that some people have made about the Common Core State Standards for public schools here in PA. Please listen as I read this list and tell me, for each one, whether you believe the statement is convincing or not convincing?

September 1995



Now I would like to read you a list of statements that some people have made about the Common Core State Standards for public schools here in PA. Please listen as I read this list and tell me, for each one, whether you believe the statement is convincing or not convincing?





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October 2012

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Welcome:

Students returned to school last month following news that performance on state performance assessments continues to fall short of hopes and expectations. Worse we learned that performance was overstated in some school districts because of cheating.

Education has never been a more important determinant of an individual's future success, and US students — across all 50 states — badly trail their global counterparts. America's young people are not ready to take their place in a globally competitive economy. Worse, they are not even ready for post-secondary education and training that will empower them to compete for family-sustaining jobs.

The state of American education — from preschool through post-graduate opportunities — is a great concern of American business leaders. The members of the Pennsylvania Business Council have made education and workforce a development through the organization's nearly forty-year history.

In recent years PBC has advocated for early childhood education and pre-kindergarten programs, end-of-course exams, maintenance of higher education funding, charter school reform, school choice, and improved teacher evaluations.

PBC's advocacy has been based on empirical research of educational "best practices" and survey research of Pennsylvania employers and voters.

This year, PBC begins to lend its voice to those who see a path to better educational outcomes and increased accountability through the initiative known as Common Core State Standards (CCSS). While the standards were launched fully in 2010 with little notice or controversy outside the education world, CCSS is now part of the Presidential campaign and national debate.

In this edition of insidePOLICY, we seek to explain the goals and details of CCSS and the accompanying Common State Assessment (CSA). We provide the opinions of Pennsylvania voters. We outline transition and implementation steps in Pennsylvania. And, we offer a few resources for tracking development and implementation of these important initiatives.

As always, your views and comments are welcome.

Sincerely yours,



PA Voters Want Rigorours Standards

Fewer than one in three Pennsylvania voters surveyed in a new poll would give public schools in the state an "A" or "B" grade, but two out of three agree that implementing more rigorous standards that would be common across the 50 states would improve educational performance.

In a survey of 600 registered voters conducted as students were preparing to return to school from the summer holiday, less than one-third of those surveyed (32 percent) gave an "A" or "B" (excellent or above average) to Pennsylvania's public schools. Two out of five Pennsylvania voters surveyed gave Commonwealth schools a "C" (for average) grade.

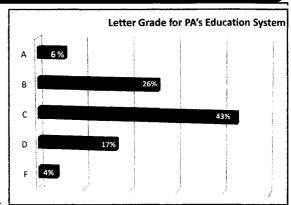
Even though many surveyed think schools are doing a fair to excellent job, almost half (48 percent) believe public schools in the state have gotten worse in the past 10 years. The survey underscores the public's desire to improve Pennsylvania education.

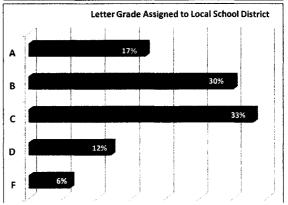
In fact, better than four of five (83 percent) of those surveyed agreed with the statement, "The same standards should be taught in every part of the state." And although only 20 percent of voters said they had ever heard about the Common Core State Standards (CCSS) initiative launched in Pennsylvania and 45 other states through the National Governors Association, the idea, once explained, was supported strongly (67 percent).

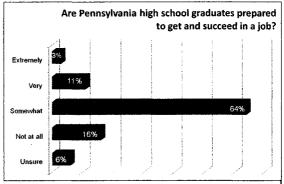
Those surveyed also strongly supported the potential benefits resulting from a more rigorous public school curriculum that would result from implementing CCSS at every grade level in Pennsylvania. A total of 68 percent said a more rigorous curriculum would make students better citizens; 76 percent agreed students would be better prepared to get a first job; 71 percent believed it would help make them life-long learners and 64 percent believed they would be better prepared for college.

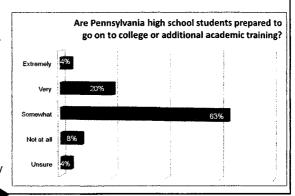
Better than one in five surveyed (22 percent) said the biggest advantage for having CCSS at every grade level was that it would help ensure that all high school graduates have the knowledge and skills necessary to enter the workforce. Almost as many people (19 percent) noted that it would ensure that all graduates have mastered knowledge required to begin a successful college career. About one in six surveyed (16 percent) thought that the biggest advantage of having statewide standards at every grade level was that students and teachers would know what is acceptable and what is expected.

One of the key features of Common Core State Standards is that all participating states would voluntarily align their learning requirements with other states. Voters participating in the survey









Standards & Exams Will Better Prepare Students

saw value in this, with 70 percent stating that it was important to them that Pennsylvania's educational system compares favorably with the education programs of other states. Similarly, 71 percent of participants want Pennsylvania's educational system to compare favorably with education in other countries.

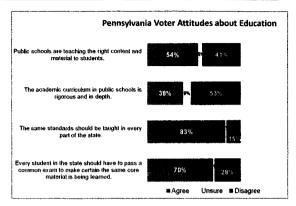
Most participants (55 percent) said they believed Pennsylvania's educational system compared favorably with other states with about one in five (20 percent) said they believed Pennsylvania schools were better than those of other states. Respondents weren't so sure about how Pennsylvania schools ranked worldwide. A total of 16 percent said they felt Pennsylvania schools were "strongly better" or "somewhat better" than other nations; 25 percent said they thought Pennsylvania schools are about the same. But, 42 percent said they felt Pennsylvania public schools were worse than those in other nations.

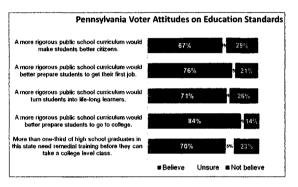
Another key component of the Common Core initiative is a set of exams that would be shared by many states — the Common State Assessment (CSA). [Editors note: More on page 7.] The federal No Child Left Behind law first required uniform exams to chart progress toward proficiency and Pennsylvania created the PSSA exams. Soon, Pennsylvania will begin to replace the PSSAs with new assessments known as the Keystone Exams. An overwhelming 70 percent of survey respondents agreed with the statement, "Every student in the state should have to pass a common exam to make certain the same core material is being learned."

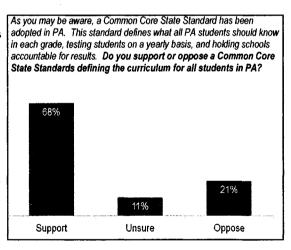
Survey respondents also shared their belief that more rigorous academic standards and proof of proficiency through common assessments would reduce the amount of remedial education needed by college and other post-secondary students. Sixty-two percent of respondents said that average recent graduates of a public school in Pennsylvania might need "some" remedial training after graduating from high school and 19 percent said recent graduates require "a lot" of remediation.

About one in three surveyed said they saw a strong role for business men and women in public schools to "serve as mentors for students." Others said the best way for businesses to be involved in education would be in "helping to set curriculum and standards" (16 percent), donating money to local teachers and schools (11 percent) and donating equipment to local teachers and schools (11 percent).

The Tarrance Group conducted the survey among 600 registered voters via live telephone interviews between Aug. 13 and Aug. 16. Each interview lasted 22 minutes and calls completed included 20 percent cell phone users. The estimated margin of error in a survey of this type is plus or minute 4.1 percent.







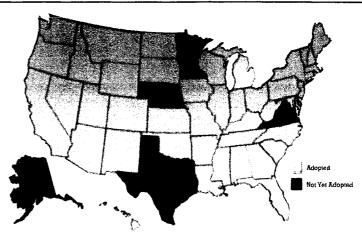


Common Core State Standards

Common Core State Standards now being incorporated in nearly ever state and U.S. territory give teachers, parents and students a consistent, firm grasp of what is expected of them in the language arts, science and math at each grade level.

The standards were developed in collaboration with teachers, school administrators, and education experts, to provide a clear and consistent framework to prepare children for college and the workforce. The standards stem from years of inconsistent and subpar performances from students nationwide.

Former Florida Governor Jeb Bush recently wrote that in all but a very few states, traditional academic standards of educational per-



Source: www.corestandards.org. For more information, click on map.

formance are too low. "A recent analysis by ACT, the respected national organization responsible for college admissions tests, concluded that three-fourths of the young men and women entering colleges were not adequately prepared academically for first-year college courses. In other words, their high-school diplomas weren't worth the paper they were printed on," Bush wrote.

The standards were developed with the oversight of the National Governor's Association Center for Best Practices (NGA) and the Council of Chief State School Officers (CCSSO). The NGA and CCSSO received initial feedback on the draft standards from national organizations representing, but not limited to, teachers, postsecondary educators (including community colleges), civil rights groups, English language learners, and students with disabilities. Following the initial round of feedback, the draft standards were opened for public comment, receiving nearly 10,000 responses.

The standards are formed by the highest, most effective models from states across the country and countries around the world, and provide teachers and parents with a common understanding of what students are expected to learn. Consistent standards will provide appropriate benchmarks for all students, regardless of where they live.

These standards define the knowledge and skills students should have within their K-12 education careers so that they will graduate high school able to succeed in entry-level, credit-bearing academic college courses and in work-force training programs. The standards:

- · Are aligned with college and work expectations;
- · Are clear, understandable and consistent;
- · Include rigorous content and application of
- knowledge through high-order skills;
- Build upon strengths and lessons of current state standards;
- Are informed by other top performing countries, so that all students are prepared to succeed in our global economy and society; and
- Are evidence-based.

PA Common Core

The Pennsylvania State Board of Education adopted the Common Core State Standards (CCSS) in July, 2010. "Pennsylvania Common Core," as they are officially titled, include all of the national CCSS verbatim; however, states may add additional statements to the standard set to incorporate any existing standards not addressed in Common Core. The Pennsylvania Department of Education (PDE) contracted with the University of Pittsburgh to compare Pennsylvania's academic standards with the CCSS. The University of Pittsburgh found only a small gap between the thencurrent Pennsylvania standards and CCSS. As analysis and alignment studies continue, there is a possibility of limited additions to the CCSS in the future.

"Most of the differences were not so much in content but in application," said Karen Molchanow, Executive Director, Pennsylvania State Board of Education. "For instance, it might be a case of a certain subject being taught in the fourth grade in Pennsylvania rather than the third grade as recommended by the Common Core standards."

As example, the University of Pittsburgh study found for English Language Arts (ELA), for grades 3, 5, 8 and 11, over 80% of the PA Standards were considered aligned moderately or very strongly to the CCSS: 80% for grade 3, 84% for grade 5, 81% for grade 8, and 91% for grade 11. When the analysis accounted for off-grades, over 87% of the PA ELA standards were considered aligned moderately or very strongly to the CCSS: 93% for grade 3, 90% for grade 5, 81% for grade 8, and 91% for grade 11.

Molchanow said the approach to incorporate the changes differs among states. "Some states are much more hands on, actually dictating the text books the schools must use. We [Pennsylvania] leave a lot of that that up to the districts," Molchanow said. "Our approach with the districts is as long as you meet the goals it's up to you."

Evaluation of the Alignment between PA Academic Standards and the Common Core Standards

Subset Line

Click here to view or download the report.

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Subset

Meanwhile, the Department is taking the Common Core standards and putting a Pennsylvania brand on them. The new language is now being considered by the Board of Education.

English language arts and mathematics educators from across the state met for three extended sessions to help pave the way for Pennsylvania's adoption of CCSS. The educators completed an alignment study for grades 3, 5, 8, and 11 comparing content and rigor of CCSS to the Pennsylvania Chapter 4 grade level standards. They expanded



the initial alignment study to include all grade levels and course standards currently available on the Pennsylvania Standards Aligned System (SAS). And, they developed documents to illustrate the relationship (including gaps) between Pennsylvania's current standards and the CCSS.

"The changes aren't necessarily to the standards themselves, but a lot of it is our having governance over any future changes," Molchanow said. More details on transitioning to CCSS are provided on page 6 of *insidePOLICY*.

Transition to CCSS

When the State Board of Education adopted the Common Core Standards on July 1, 2010, it charged the Department of Education with the responsibility to complete a full alignment study of Pennsylvania Academic Standards to Pennsylvania Common Core - in terms of both content and rigor. That work defines a transition plan and provide clear direction for districts to implement Common Core Standards.

The proposed three-year transition plan, concluding with full implementation of Common Core for the 2013-2014 school year, includes the development of crosswalk documents and professional development to assist districts in aligning their curriculum with the CCSS. Now two full school years into the transition plans, there is a sense of urgency to address gaps, finish development and training, and finalize preparation.

Local School District Responsibility

2010-11

- Curriculum and instruction based on the current Pennsylvania Academic Standards
- Spring 2011 PSSA based on current eligible content aligned to PA Standards
- Attendance at PDE/IU staff development sessions to begin transition planning

2011-12

- Curriculum and instruction based on the current Pennsylvania Academic Standards
- Create instructional redesign cycle and begin modification of board-approved curricula in English Language Arts and Mathematics through initial study of Common Core Standards alignment documentation provided by PDE.

2012-13

 Continue with curriculum rewrites, with July 1, 2013, target date for full implementation of PA Common Core

PDE Responsibility

2010-11

- Common Core transition teams complete alignment study and develop PA Common Core framework
- Continued development of Keystone Exams based on eligible content aligned to the Common Core Standards
- Professional development offered for districts to begin transition plans

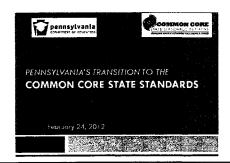
2011-12

- Ongoing professional development to assist districts in creating transition plan and beginning initial efforts to align curriculum and instruction to PA Common Core standards
- Standards Aligned System (SAS) fully aligned to PA Common Core Standards

2012-13

•

Ongoing professional development to support full implementation in PA schools.



There are a number of "moving parts" in the CCSS implementation plan. The transition from PSSA exams to Keystone Exams to CSA has even more complications—that the least of which are the Commonwealth's Chapter 4 regulation is not final (see page 10), Keystone Exams are still in development and CSAs are not finalized (see page 7). To review a PowerPoint on Pennsylvania's transition plan, click on the slide to the left.

Common State Assessments

Two assessment consortiums, SMARTER Balanced and the Partnership for Assessment of Readiness for College and Careers (PARCC), have risen from the Common Core movement. Replacing individual state exams with assessments that cross state boundaries is an untested experiment, some policymakers say, and public education could benefit from having unique approaches to compare.

"Competition breeds innovation,"
Joe Willhoft, executive director for
SMARTER Balanced, told **Governing**magazine. "If you only have one model
and it doesn't work, then you don't know
if it was a bad idea or just a bad design."

Twenty-eight states have joined SMARTER Balanced. Twenty-four, including ten of the twelve states to win Race to the Top funds, are a part of PARCC.

For its part, Pennsylvania has an advisory role in each consortium. "At this point we are aligning the Common Core standards with PSSA (Pennsylvania System of School Assessment)," said an official with the Department of Education. "We see no reason at this time for adopting the assessments of either consortium."

The annual Pennsylvania System of School Assessment (PSSA) is a standards-based, criterion-referenced assessment used to measure a student's attainment of the academic standards while also determining the degree to which school programs enable students to attain proficiency of the stan-

dards. Every Pennsylvania student in grades 3 through 8 and grade 11 is assessed in reading and math. Every Pennsylvania student in grades 5, 8 and 11 is assessed in writing. Every Pennsylvania student in grades 4, 8 and 11 is assessed in science. Pennsylvania will switch from using the PSSA exams in high school to using the Keystone Exams on specific subjects. The tests cover Algebra I, Biology and Literature.

PARCC and SMARTER Balanced, which both have received federal funding to develop their testing models, are designed to be "performance-based" to fulfill Common Core's goal of preparing students for college and a career. That means they'll require students to demonstrate higher-order thinking, through problem-solving, essay-writing and research projects, as opposed to the multiple-choice, fill-in-the-blank tests of the past.

"That's a very different architecture from the assessments that states give right now," Massachusetts Education Commissioner Mitchell Chester, whose state was instrumental in developing PARCC, told **Governing**.

Both consortiums also feature periodic assessments throughout the school year. PARCC's schedule begins

with a diagnostic test at the start of the year, designed to provide teachers with a sense of their students' knowledge and inform their instruction. A mid-year assessment updates educators on their students' progress. SMARTER Balanced offers optional interim tests at the beginning and middle of the year.

key differences. PARCC requires testing in grades 9-11, while SMARTER Balanced leaves testing in grades 9 and 10 optional. SMARTER Balanced will determine its cutoff scores for passing or failing after piloting the assessments in spring 2014. PARCC, on the other hand, will set those standards after the first year of implementation.

Others are more substantive, particularly in how the assessments utilize technology. In conversations with members of both consortiums, that element of the test-

ing experience was cited as the fundamental distinction between the two consortiums.

SMARTER Balanced is defined by its computer adaptive model. The tests will adjust their line of questioning and difficulty in real-time based on the responses of individual students. "With most tests,

every student sees all the same items. Our test moves to where the student is," executive director Willhoft said. "This is really important if we have an interest in whether a student is improving."

The computer adaptive model is an idea that has existed for a while, Wilhoft said, but most individual states don't have the resources to develop the necessary technological infrastructure. A partnership through SMARTER Balanced presented that opportunity: Idaho, for example, had a history of experimenting with adaptive testing, which led to a desire for that kind of assessment, Carissa Miller, deputy superintendent at the Idaho Department of Education, told **Governing**. PARCC's tests are also computer-based, but will adhere to a fixed format for all students.



Support for CCSS in Other States

For states, there are many good arguments for adopting the Common Core State Standards (CCSS). Common standards provide clarity about what students are expected to learn in mathematics and English language arts; they help teachers zero in on the most important knowledge and skills; they establish shared goals among students, parents, and teachers; they help states and districts assess the effectiveness of schools and classrooms and give all students an equal opportunity for high achievement. But why did states ultimately decide to sign on?

When at the bottom, there is nowhere to go but up. That's the situation in which Tennessee found itself back in 2007, when the U.S. Chamber of Commerce's "Leaders and Laggards" report card gave the state an 'F' for truth in advertising about student proficiency. Weak assessments, coupled with low standards, meant that large percentages of students were testing proficient on state reading and math exams—even though only a fraction of them were clearing the bar on the more commonly accepted National Assessment of Educational Progress (NAEP). The message was that the state's high school diplomas essentially had no value.

The lousy report card caused the state's public and private sector leaders to take notice—and then take a series of decisive actions that ultimately made the state's adoption of Common Core standards this past summer a noncontroversial, logical next step to improve education statewide. Tennessee's three-year journey is a lesson in informed leadership and strategic action. While the external catalyst for reform may have been a publicly embarrassing low grade, the internal catalyst was a nonpartisan approach to building a coherent, strategic plan that engaged and aligned a wide range of stakeholders in reform efforts.



Bill Frist, M.D. Former U.S. Senate Majority Leader Founder and Chairman of the State Collaborative on Reforming Education (SCORE)

While the external catalyst for reform may have been a publicly embarrassing low grade, the internal catalyst was a nonpartisan approach to building a coherent, strategic plan that engaged and aligned a wide range of stakeholders in reform efforts.

Governor Phil Bredesen, a Democrat, responded quickly to Tennessee's poor report card by acknowledging the system's failure. Working with both Republicans and Democrats in the state legislature, Bredesen built broad public and political mandates for higher academic standards. After traveling the state to meet with business leaders, he called for a new, bold commitment to standards under the Tennessee Diploma Project. The State Board of Education made the necessary policy changes in less than a year, and then rolled out more rigorous coursework and tests in the 2009-10 school year.

Political and educational leadership efforts expanded with the 2008 emergence of the State Collaborative on Reforming Education (SCORE), a nonprofit nonpartisan organization I founded to encourage sound policy decisions and thoughtful reform at the state and local levels. With a broad view of Tennessee's reform potential, SCORE issued a call to make our schools the best in the Southeast within five years. SCORE's work—including hundreds of conversations with educators, parents, and students in more than 80 town hall meetings across the state—helped set the atmospheric conditions necessary for Tennessee's first-round win in the federal Race to the Top competition. Ongoing work includes solidifying and deepening the broad public support that will be needed to achieve comprehensive reform goals.

So when the time came in July 2010 to decide whether or not to adopt the Common Core standards, the State Board of Education's decision was easy. Tennessee already had come a long way since its failing grade in 2007. With both political and business leadership aligned, it approached educational reform in a nonpartisan way. After the State Board's action, we used the power of convening, developed a clear, well-articulated focus on innovative reform on a statewide basis, built a coalition of stakeholders, raised visibility, and increased public awareness.

While the next steps to implement reform will not be easy, support from the public and private sectors continues to grow, and both gubernatorial candidates this year have committed to continue this powerful statewide educational reform agenda.



In late July 2010, the Massachusetts Board of Elementary and Secondary Education unanimously adopted the Common Core State Standards. For us, it was a natural, noncontroversial decision to make at the end of a deliberate, empirical review process. For several years, our Commonwealth's standards and assessments have enjoyed an outstanding reputation nationally. Our students have performed well in both national and international educational comparisons. However, we have not ever been complacent with that status. As good as our standards have been, as the common standards effort unfolded, Massachusetts was already preparing working drafts of new standards. We were ready, therefore, to provide a lot of coordinated

input into the development of the Common Core standards.

We concluded, therefore, that while Massachusetts standards were very strong, the advantages of adopting the Common Core standards outweighed the disadvantages. As a lead up to our adoption of the final Common Core, we used an empirical process to judge the documents in terms of their content, rigor, clarity, vertical alignment, relevance to college and career readiness, and measurability. We received three types of reports. The first was a summary of an online public survey on the Common Core standards conducted by the Massachusetts Department of Elementary and Secondary Education; the second was a side-by-side comparison of Massachusetts working draft standards to the Common Core; and a third was an independent analysis of two groups of Massachusetts educators, one in PK-12 and the other in higher education. All three sets of input reached the same conclusion: that for the English language arts standards, the Common Core was a better choice than the Massachusetts working draft, and for math, that both the Common Core and the Massachusetts draft were excellent options.



Mitchell D. Chester, Ed.D. Commissioner, Massachusetts Department of Elementary & Secondary Education

We concluded, therefore, that while Massachusetts standards were very strong, the advantages of adopting the Common Core standards outweighed the disadvantages. And there would be opportunities to customize the Common Core in areas where we feel our standards are stronger.

As we begin to implement the Common Core, we are buttressed by two significant new awards from the U.S. Department of Education. Massachusetts has been awarded \$250 million in Race to the Top funds, and we are serving on the governing board of the Partnership for Assessment of Readiness for College and Careers (PARCC), one of two state consortia selected to develop new assessments that align with the Common Core standards.

While a lot of hard work lies ahead to help districts and schools with the new standards, we are committed to this new era of strategic educational reform that will strongly support teachers, new curricula, innovative instructional tools, data gathering and use, and new aligned assessments.





Eric J. Smith Commissioner of Education Florida Depart. of Education

When Florida's content standards received an overall grade of 'D-' in the Fordham Institute's 2006 State of State Standards report, the time had come for our state to re-examine and renew its commitment to improving education. That report didn't pull any punches: it also gave us an 'F' in math and called for the state to "go back to the drawing board."

But that comparison of state standards, as uncomfortable as it was, only tells a part of the story: Florida also had not been faring well in international comparisons of mathematics standards. Analyses that compared Florida's NAEP and TIMSS results to both the U.S. and top performing countries showed that only 27 percent of Florida's students were at or above proficient levels for math, and 21 percent for science.

The messages from these two separate analyses were clear: Florida needed to develop new standards. So it did. The result in 2007 was a new, rigorous set of Florida's Sunshine State Standards. Those standards fared much better in the 2010 Fordham Institute analysis that compared state standards to the Common Core State Standards, and received an 'A' in math and a 'B' in English language arts. Our standards set the bar for what we expected of the Common Core.

We fully expect that the Common Core standards will enable us to compare our students with those in other states, and that we will be better able to benchmark our achievement with international standards. We feel these comparisons will help us to better serve our students in a competitive, global economy.

Because we had already gone through our own internal development standards development process and knew what to expect, we began to participate in the Common Core process early. Our involvement continued throughout the development and review processes. As the standards emerged, we came to understand the benefits of signing on and the value of having our students compete with others around the nation and around the world. And, because of bi-partisan state support, an understanding of the connection between education and our economic future, and the rigor of the Common Core standards, there was not much state opposition to adoption.

We fully expect that the Common Core standards will enable us to compare our students with those in other states, and that we will be better able to benchmark our achievement with international standards. We feel these comparisons will help us to better serve our students in a competitive, global economy.

We also realize the critical importance of new assessments that align with the Common Core standards, which is why Florida is serving as the fiscal agent for one of the multi-state consortia selected to develop the new assessments, the Partnership for the Assessment of Readiness for College and Careers(PARCC).

Conservative/Business Plot to Take-over Education? or Liberal Plot to Nationalize Education?

In the last two months, President Obama and the Democrat National Committee have applauded and embraced the Common Core State Standards (CCSS) initiative to such a high degree that some Conservatives and Romney Campaign supporters have been moved to denounce the effort as a liberal plot to run education from Washington. At least one Republican activist referred to CCSS as "ObamaCore."

The irony is that liberals have been leery of CCSS accusing the business community of trying to worm its way into education policymaking and classrooms by using political muscle to force state government allies to adopt the standards even before they are fully developed and vetted. Liberals and Democrats have accused the business community and Republicans of using "education reform" to attack public education and teachers. The left has been particularly critical of the increasing role private foundations are playing in the development of education policy.

"There is something fundamentally undemocratic about relinquishing control of the public education policy agenda to private foundations run by society's wealthiest people," wrote Dr. Diane Ravitch, assistant secretary of education in George, H.W. Bush's Administration.



Research Professor of Education New York University Diane Ravitch, PhD



American Enterprise Institute Education Policy Director Frederick M. Hess

"Most of the complaints about the foundations are coming from teachers unions or education professors who happen, in this case, to

disagree with their preferred strategies," says Frederick "Rick" Hess, noted and oft-quoted education policy director at the American Enterprise Institute. Ravitch was a supporter of many so-called "market-based" education reforms, but has had something of a change of heart in recent years.

Who's correct? Well, none of these "conspiracy theories" is factually correct. Moreover, since the beginning of the CCSS effort, supporters have included political, business, and civic leaders of every philosophical and ideological stripe. People have gotten to "common core" position from a variety of starting points.

CCSS is another step in a long progression of state education policymaking and "reform." In Pennsylvania, Democrat Governor Robert Casey initiative "outcomes based education." Republice's Administration championed state "academic standards." Similar evolutions occurred in

lican Governor Tom Ridge's Administration championed state "academic standards." Similar evolutions occurred in many other states along with initial efforts to "assess" student achievement and subject mastery in an effort to instill "accountability" into education.

President George W. Bush's Administration surveyed the hodge-podge of state standards and assessments and inaugurated No Child Left Behind (NCLB), in part, to get a better handle on assessment and accountability. President Bush proposed the law shortly after taking office in 2001. NCLB's Congressional sponsors were Rep. (now Speaker) John Boehner (R-OH), Rep. George Miller (D-CA), and Sen. Edward Kennedy (D-MA) and Sen. Judd Gregg (R-NH). The legislation was adopted by overwhelming margins. NCLB requires 100 percent of students — including disadvantaged, disabled, English-as-a-Second-Language (ESL), and special education students — to reach the same higher state standards in reading and mathematics by 2014. And the act mandated standardized testing. In Pennsylvania, these tests are the PSSAs.

As the NCLB magic year of 2014 rapidly approached, there was much apprehension that schools could not reach required "adequate yearly progress" among their students. Simultaneously, more and more businesses reported that jobs were going unfilled because firms couldn't find qualified workers — those who could read, write, and perform basic mathematical operations — even in the midst of a recession.

As an outgrowth of discussions among Governors, the chiefs of state education agencies — cabinet secretaries, commissioners, and related positions — began to talk about collaboration. In November 2007, the Council of Chief State School Officers (CCSSO) gathered in Columbus, Ohio for its annual policy forum and the members discussed the development of common standards for their states and territories.

State Laboratories of Democracy Best Suited to Create Education Policy

CCSSO members began to formulate a consensus plan among the states to move forward together; to work toward a "common core" that would ensure young people are career and college ready. CCSSO collaborated with the National Governors Association Center for Best Practices (NGA Center) — essentially a "research and development firm" that directly serves the nation's governors — to craft a policy that could be adapted and adopted by all states.

On December 19, 2008, the National Governors Association Center for Best Practices (NGA Center), CCSSO, and Achieve released an influential report, Benchmarking for Success: Ensuring U.S. Students Receive a World-Class Education. The report highlighted a set of recommendations from an advisory group on international benchmarking made up of state education chiefs, governors, and leading education researchers. The first recommendation of the panel was to "upgrade state standards by adopting a common core of internationally benchmarked standards in math and language arts for grades K-12 to ensure that students are equipped with the necessary knowledge and skills to be globally competitive." From then on, the process moved rapidly.

In April 2009, CCSSO and NGA convene chiefs and governors education policy advisors in Chicago to launch the Common Core State Standards Initiative. CCSSO and the NGA invited states to commit to the process of developing a common set of state standards in English language arts and mathematics. By June 2009, CCSSO and NGA announce that forty nine states and territories have committed to participate in a state-led process to develop common English language arts and mathematics standards. By September of that year, fifty-one CCSSO members agreed to participate in the process. A few weeks later, CCSSO and NGA released the first draft college and career ready graduation standards for public comment. The roots of the Common Core initiative are evident in the 2009 whitepaper Transforming Education: Delivering on Our Promise to Every Child published by the CCSSO.

Shortly after President Obama took office in January of 2009, Education Secretary Arne Duncan met with state education officers to discuss reform. "Hold on," said the CCSSO members. "We're way ahead of you. We have our own initiative." And they described the Common Core effort. Duncan became enthused and backed-off on Federal government driven reforms. Instead, the Obama Administration added \$4.35 billion to the "stimulus package" and launched the Race to the Top initiative in July 2009 — an effort to spur states to early implementation of CCSS.

In March 2010, NGA and CCSSO released the draft K-12 standards for public comment. More than 10,000 educators and members of the public provide comments. On June 2, 2010, the organizations released the final CCSS at a public event in Suwanee, GA.

Economic competitiveness was foremost in the minds of many of the governors. "American competitiveness relies on an education system that can adequately prepare our youth for college and the workforce," commented Georgia Governor Sonny Perdue (R). "When American students have the skills and knowledge needed in today's jobs, our communities will be positioned to compete successfully in the global economy." "Strong schools are the surest path to our nation's long-term economic success. America's students are now competing with children around the globe for jobs and opportunities after graduation," said Delaware Governor Jack Markell (D).

Many commentators have suggested it's best to think of CCSS "as a floor, not a ceiling; common core sets a threshold and challenges states to excel." Many governors and state legislatures pride themselves for the experimental policymaking role captured in 1932 by U.S. Supreme Court Justice Louis Brandeis who described states as "laboratories of democracy" — suggesting that it was more effective for the states to each take a stab at solving problems of public policy, learning from one another and improving upon policy through iteration.

The "laboratories of democracy" theme seems to appeal to former Massachusetts Governor and GOP presidential nominee Mitt Romney who said in remarks to <u>NBC's Education Nation</u> a few weeks ago, that he approves of states choosing voluntary to adopt Common Core standards, but opposes federal oversight, regulation or financing. Romney said to NBC's Brian Williams: "I don't subscribe to the idea of the federal government trying to push Common Core on various states. It's one thing to put it out as a model and let people adopt it as they will. But to financially reward states based upon accepting the federal government's idea of a curriculum I think is a mistake.... I'd rather let education and what is taught state by state be determined state by state, not by the federal government." Pennsylvania is part of the national effort, but also charting its own course — crafting its own flavor of the Common Core.

Academic Standards & Graduation Requirement

The Pennsylvania State Board of Education is taking the procedural steps necessary to implement the Common Core State Standards (CCSS) by amending the current state regulations on academic standards and assessments (Annex A of Title 22, Chapter 4 — Public School Code of 1949, 24 P. S. §§ 26-2603-B and 26-2604-B. "Chapter 4," as it is commonly known, provides the requirements for Pennsylvania academic standards, assessments and high school graduation standards for public schools across this Commonwealth including school districts, area vocational-technical schools (AVTSs), charter schools, and cyber charter schools.

In 2010, the state regulations were amended to include the Keystone Exams and CCSS. Just as important, the regulation created a system of supports including mandatory supplemental instruction for struggling students and diagnostic tools for teachers to help students reach proficiency with the more rigorous state academic standards.

This amendment to the regulation continues that process. The Department of Education convened teams of educators to provide input during the drafting of the Pennsylvania's updated academic standards. A committee of the State Board held public hearings to solicit input on draft revisions to Chapter 4 regarding the Keystone Exams. This amendment will dramatically enhance the impact of the Keystone Exams, mandating that a student must demonstrate "proficiency" on a Keystone Exam in order to graduate. The State Board writes, "there is emerging evidence that ... requiring passage of a test or exam to obtain a high school diploma can be a 'potent policy in terms of bringing about real positive changes in student learning.' To assure that taxpayer dollars produce results in public education, the appropriate standards and assessments need to be coupled with a concrete incentive for learning."

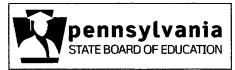
Most states are moving in this direction. "According to the Center for education Policy," says the State Board, "approximately 76% of public high school students nationwide, including 78 % of low-income students and 84% of students of color, are enrolled in states with exit exams. The proposed rulemaking would allow the Commonwealth to keep pace with rising academic expectations nationally while still providing districts and students with significant flexibility and alternatives in implementing and meeting the requirements."

Field testing of the Keystone Exams, however, showed that many school districts needed more time to align their curricula and their teaching with the higher expectations, and so new graduation requirements were postponed slightly. The Department of Education also proposed reducing the number of subjects for which the exams would be developed to save state funds. Many groups, including the Pennsylvania Business Council and the Pennsylvania Partnership for Children, testified against the proposed cutbacks and recommended instead, an extended development and phase-in of the exams to accommodate budgetary pressures. A compromise of that sort is included in the final rulemaking. The proposed regulations:

- Require that students achieve proficiency on five Keystone Exams in order to graduate Algebra I, English
 literature, English composition, biology, and civics. This change simplifies the determination of proficiency by
 eliminating the requirement that scores on Keystone Exams count as one-third of a student's grade.
- Extend the timeline for implementing the revised graduation requirements by phasing-in the first three Keystone Exams (Algebra I, English literature and biology) in 2016-17, adding English composition in 2018-19 and civics in 2019-2020.
- Extend the timeline, subject to funding by the Commonwealth, to create the remaining five Keystone Exams
 for districts to use voluntarily (Geometry in 2016-17, U.S. History in 2017-18, Algebra II in 2018-19, chemistry in 2019-20, and World History in 2020-21).

The State Board acknowledges that amendments to Chapter 4 will be ongoing. Says the Board, "As envisioned by the Council of Chief State School Officers (CCSSO) and the National Governors Association (NGA), these Standards are intended to be a living work; as new and better evidence emerges, the Standards will be revised accordingly."

Click here to review the entire proposed rulemaking.

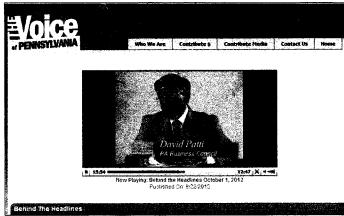


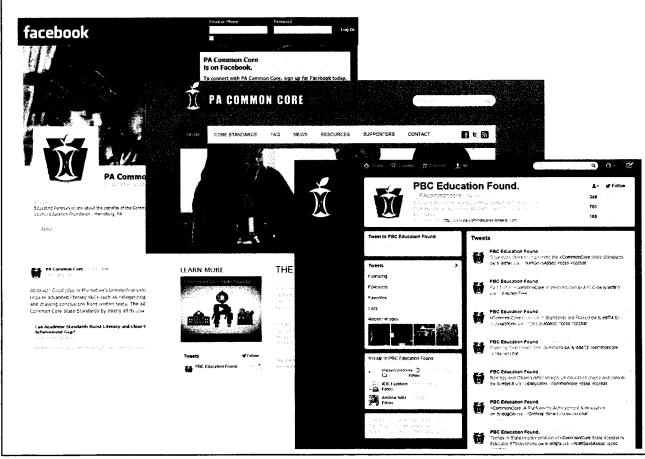
Resources from PBCEF

The Pennsylvania Business Council Education Foundation has launched a major communications program designed to educate Pennsylvania opinion leaders, policymakers, the media, and the public on Common Core State Standards CCSS) and the Common State Assessment (CSA). Through this publication and other media, PBCEF will seek to explain the content of the standards and address concerns, providing supporting research CCSS to other business priorities. As resources to policymakers and others interested in CCSS and CAS, the PBCEF has launched the www.pacommoncorestandards.org website, Facebook page at www.facebook.com/pacommoncore, and Twitter handle @PAcommoncore.

The PBCEF will also provide information on CCSS and CSA through the public affairs television shows **Behind the Headlines**, **and Pennsylvania Newsmakers**; and through talk radio. If you would like to learn more, or secure a speaker for a meeting or event, please contact the PBCEF at 717-232-8700, or through the website and Twitter account.

Click on the graphic to be taken to each website below. Clicking on the graphic to the right will let you watch a t 15 minute interview on CCSS with PBC President & CEO David W. Patti.





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November 5, 2012

The Honorable Silvan B. Lutkewitte, III Chair Independent Regulatory Review Commission 333 Market Street, 14th Floor Harrisburg, PA 17101

Re: Proposed Regulation #6-326 - Academic Standards and Assessments

Dear Chairman Lutkewitte:

On behalf of Pennsylvania Business Council (PBC), I would like to submit our comments on proposed regulation #6-326 (IRRC Number 2976) relating to academic standards and assessments, supporting this regulation and urging the Independent Regulatory Review Commission's approval.

This proposed regulation is necessary to implement the Common Core State Standards (CCSS) by amending the current state regulations (Annex A of Title 22, Chapter 4 — Public School Code of 1949, 24 P. S. §§ 26-2603-B and 26-2604-B. "Chapter 4,") that spell-out requirements for Pennsylvania academic standards, assessments, and high school graduation standards for public schools across this Commonwealth including school districts, area vocational-technical schools (AVTSs), charter schools, and cyber charter schools.

In 2010, the state regulations were amended to include new assessments known as "Keystone Exams" and to update Pennsylvania's academic standards in voluntary conformity with the nationwide initiative of governors known as the Common Core State Standards (CCSS). Just as important, the regulation created a system of supports including mandatory supplemental instruction for struggling students and diagnostic tools for teachers to help students reach proficiency with the more rigorous state academic standards.

This amendment to the regulation continues that process. The Department of Education convened teams of educators to provide input during the drafting of the Pennsylvania's updated academic standards. A committee of the State Board held public hearings, in which PBC participated, to solicit input on draft revisions to Chapter 4 regarding the Keystone Exams. This amendment will dramatically enhance the impact of the Keystone Exams, mandating that a student must demonstrate "proficiency" on a Keystone Exam in order to graduate. PBC strongly supports the graduation requirement. Testimony we provided to IRCC in October 2009 included our survey research of 400 employers who indicated they had no trust that a high school diploma provided that a job candidate was career ready. PBC has long supported a graduation requirement based on statewide, standard assessments.

Field testing of the Keystone Exams showed that many school districts needed more time to align their curricula and their teaching with the higher expectations, and so it was proposed to delay the new graduation requirements slightly. The Department of Education also proposed reducing the number of subjects for which the exams would be developed to save state funds. Many groups, including PBC and the Pennsylvania Partnership for Children, testified against the proposed cutbacks and recommended instead, an extended development and phase-in of the exams to accommodate budgetary pressures. A compromise of that sort is included in the final rulemaking. The proposed regulations:

- Require that students achieve proficiency on five Keystone Exams in order to graduate –
 Algebra I, English literature, English composition, biology, and civics. This change simplifies
 the determination of proficiency by eliminating the requirement that scores on Keystone
 Exams count as one-third of a student's grade.
- Extend the timeline for implementing the revised graduation requirements by phasing-in the first three Key-stone Exams (Algebra I, English literature and biology) in 2016-17, adding English composition in 2018-19 and civics in 2019-2020.
- Extend the timeline, subject to funding by the Commonwealth, to create the remaining five Keystone Exams for districts to use voluntarily (Geometry in 2016-17, U.S. History in 2017-18, Algebra II in 2018-19, chemistry in 2019-20, and World History in 2020-21).

PBC supports the specific elements of the rulemaking described above and the entire package (#6-326 – IRRC Number 2976) relating to academic standards and assessments, and urges the Independent Regulatory Review Commission's approval.

Sincerely yours,

DAVID W. PATTI
President & CEO