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October 9, 2012

The Honorable Silvan B. Lutkewitte, III
Chairman
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 Partnerships for Children (PPC), I would like to express strong support for proposed regulation #6-326 (IRRC Number 2976) relating to academic standards and assessments. I urge the Independent Regulatory Review Commission's approval.

For more than six years, PPC has been working on the issue of high school graduation requirements to ensure Pennsylvania's high school students are prepared for the challenges that face them after high school. The issue is as important today as it was back in 2005, when I served on the Governor's Commission on College and Career Success. Too many students in Pennsylvania graduate each year without demonstrating proficiency of the commonwealth's academic standards. Nearly 36 percent of the graduating class of 2011 did not score proficient on the 11th grade PSSAs or the 12th grade retake – and these are not just students from our most distressed schools. There were 419 school districts, as well as 70 charter schools and career and technical centers, which graduated at least 20 percent more students than scored proficient or advanced on the 11th grade PSSAs. This not only raises concern about how prepared our graduates are to transition to the next chapter of their lives, it also reinforces the commonwealth's need for a common-sense accountability system to ensure students have met our academic standards when they graduate and hold school districts and students accountable for results.

Three years ago, this body approved regulations that improved Pennsylvania's graduations requirements and provided educators with the tools to help ensure students graduate ready for postsecondary education and compete in a global economy. These regulations included a plan to phase in a series of end-of-course exams called Keystone Exams in 10 core subject areas. Just as important, the regulations created a system of supports - including mandatory supplemental instruction for struggling students and voluntary model curriculum and diagnostic tools for teachers- to help students reach proficiency in state academic standards.

Despite this good work, ongoing fiscal challenges and the realization (based on field testing of a few of the Keystone Exams) that districts need more time to align curriculum have led the State Board of Education to propose changes to the Chapter 4 regulations that will give the commonwealth and schools more time to prepare for the new graduation requirements to take effect and make sure that the

assessments are aligned with the Common Core academic standards in English language arts and mathematics.

PPC has remained steadfast in the fundamental elements required of any proposal to change the Chapter 4 regulations and gain our support. These elements include a reliable and consistent assessment system (with accommodations for special needs children) that ensures more of our students graduate from high school ready for postsecondary education and the workforce, supports for struggling students including mandatory supplemental instruction, and tools for teachers and schools. PPC believes the proposed regulations not only meet these essential elements but also preserve the intent of the Chapter 4 regulations adopted just a few years ago, while addressing the commonwealth's fiscal challenges and providing more time for school districts to align their curricula with the assessments. The proposed regulations would:

- 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, providing more time for the commonwealth to develop and field test the Keystone Exams and more time for schools to prepare. This change would phase 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).
- Provide stronger mandatory supplemental instructions language to ensure struggling students are offered and participate in supplemental instruction. This results in shared accountability for both the school district and the student -- school districts are required to provide supplemental instruction to students who do not pass Keystone Exams or a validated local assessment through grade 11 or until the student demonstrates proficiency in the subject area, and students are required to participate in the instruction before re-taking the Keystone Exam or a module of the exam, and before participating in the project-based assessment option.
- Tighten the language regarding the project-based assessments to prevent students from jumping directly to the project-based assessment by:
 - limiting this option to 12th graders who have taken the course, not passed the Keystone Exam, and met the district's attendance policy.
 - requiring students to successfully participate in supplemental instruction before being eligible to participate in the project-based assessment.
 - ensuring rigor and scoring reliability by creating a statewide panel to score all project-based assessments.
- Require a school district that submits an emergency waiver request for more than 10 percent of its students to submit an action plan outlining improvements the district will implement to address the situation. This will provide some limited assurance that the emergency waiver is not misused.

It is important that we maintain the commitment we made to our young people, parents, employers and taxpayers. The compromise represented by these regulations takes into consideration the

commonwealth's difficult fiscal environment while still ensuring students have the basic skills needed to be successful in postsecondary education and the 21st century workforce.

Again, PPC supports these proposed regulations and I urge IRRC to give its initial approval to them.

Thank you for your consideration of my request.

Sincerely,

A handwritten signature in black ink, consisting of a large, stylized 'J' and 'B' intertwined, with a long horizontal flourish extending to the right.

Joan L. Benso
President and CEO

cc: The Honorable Larry Wittig