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October 9, 2013

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

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Dear Honorable Silvan B. Lutkewitte, III:

I am writing in support of the final-form Chapter 4 regulations (#6-326 – Standards and Assessments) and urge the Independent Regulatory Review Commission to approve them. The regulations, which would adopt the PA Core Standards and aligned assessments, including Keystone Exams are important reforms that will help ensure high school graduates in Pennsylvania have the strong educational foundation needed to transition to postsecondary life.

Additionally, as compared to previous academic standards, the PA Core Standards are rigorous, internationally benchmarked standards developed by Pennsylvania teachers and are aligned to the Common Core State Standards. The standards outline what students should know and be able to do at each grade level. The teachers in my District wholly support the PA Core Standards and are developing lessons whereby students are using problem solving and critical thinking at all levels.

For the past year and a half, our district has invested much time and money in our effort to align our curriculum and instruction to the PA Core Standards. Failing to enact these standards would undermine the time and effort my district already has dedicated to this important work.

The Chapter 4 final-form regulations also make some important changes to the Keystone Exams -- such as reducing the number of Keystone Exams from 10 to five, eliminating the provision that Keystone Exams count for at least one-third of students final grade, and pushing back the timeline for Keystone Exams as a graduation requirement from 2015 to 2017. These measures will help my District ensure that students are prepared to take and successfully pass the assessments.

We believe the Keystone Exams provide a number of important benefits over one comprehensive assessment (such as the 11th grade PSSAs). Keystone Exams, given at the end of a course when content is fresher and more relevant to the student, assess more in-depth content. Additionally, if a student doesn't pass a Keystone Exam, the student can receive supplemental instructions and re-take the test, or the module of the Keystone Exam the student didn't pass. If the student is still unsuccessful in passing the Keystone Exam, he or she can demonstrate proficiency on a project-based assessment. The structure of this process mimics good assessment taking practices, where teachers review data, make decisions about the needs of their students, reteach concepts and skills, and then provide students an opportunity to test again.

The Chapter 4 final-form regulations also acknowledge Pennsylvania's longstanding tradition of local control by providing a number of pathways for students to demonstrate proficiency – the Keystone Exams, Advanced Placement and International Baccalaureate exams, validated local assessments, and a project-based assessment. In addition, there is a waiver provision in the regulations that provides a mechanism for the chief administrator to waive the proficiency requirement and award students diplomas in special circumstances.

Again, I support the final-form Chapter 4 regulations as a sensible approach to make certain that the commonwealth's students achieve to rigorous PA Core Standards and are prepared to transition to postsecondary education, 21st century careers, military service and productive citizenship.

Sincerely yours,

A handwritten signature in black ink that reads "Tracy A. McNelly". The signature is written in a cursive, flowing style.

Dr. Tracy A. McNelly
Assistant Superintendent of Secondary Education
Norwin School District