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Comments on Chapter 4 revisions, Regulation #6-326, IRRC #2976, Submitted on October 19, 2012.

To the State Board of Education: Written comments on the Revisions to Chapter 4, October, 2012

By

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(see bio at the end of this commentary for information about the author)

Commentary Synopsis

I am writing a commentary to the State Board of Education once more¹ in the hope that someone on the State Board and in the Department of Education will “see the light” and realize that the implementation of Keystone exams and the eliminating of the culminating project will set back education in the State for a long time to come.

A 21st century world, with its major, rapid changes, requires schools and districts to institute new forms of curriculum, instruction, teaching and learning that promote lifelong learning, citizenship and personal, customized development of individual talents, strengths, interests and goals. Few if any of these goals will be enhanced through the implementation a series of traditional exams that duplicate already existing exams in every school district, lock in an already outmoded and standardized high school system, suggest that every child has to graduate with the same knowledge and skills, reduce the likelihood of experimentation and change, increase district and school bureaucracies, complexities, and costs, increase the probability of more school dropouts, and reduce the likelihood that alternative assessment measures that better assess 21st century skills will ever be used by Pennsylvania’s schools.

It is even more bewildering as to why the State is eliminating the culminating project requirement from Chapter 4, which has actually helped so many students over the years to be better prepared for college, career and citizenship. Ironically, the elimination of the

¹ I have testified several times before the State Board, arguing against the implementation of the Keystone Exams and the elimination of the culminating project.

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culminating project requirement from the regulations also reduces the likelihood that key 21st century skills such as inquiry, research, coherent writing of term papers, and presentation skills will ever be adequately assessed in Pennsylvania's schools.

In ten or twenty years, when the results of implementing these tests and eliminating the culminating project are clear, we will realize that Pennsylvania's children have not been better prepared for college, career, or citizenship than they are today, and we will be left to wonder why those in charge ever proposed a complex, costly, traditional testing system that moved us backward, not forward, in our quest to improve education for today's and tomorrow's children.

In sum, the major thrust of this commentary is that it is still not too late to turn the clock back, rethink the implementation of these regulations, and come up with a much better plan for improving the state of education in Pennsylvania. The implementation of Keystone exams and elimination of the culminating project will not significantly improve the preparation of our students for living in the 21st century, will harm educational progress in Pennsylvania, and will increase the dropout problem! Instead, the State Board should focus its energies on providing regulations, incentives and opportunities for schools and Districts to institute serious and major reforms that will better prepare Pennsylvania's students to live in today's and tomorrow's world.

Complete Commentary

Introduction

Today's 21st century world is a very different world than in the past, and includes major scientific breakthroughs, information explosions, search engines that allow us to instantaneously find vast amounts of information, new forms of communication and social networking, global economic interdependence, relatively easy travel to remote parts of the world, technological breakthroughs, and more. Many well paying jobs used to be on the assembly line, but most now require specialized skills and knowledge, the use of many new technologies, and the need to be continuous and self-directed learners, curious, perseverant and responsible, good problem solvers, creative, adaptable, and collaborative.

Preparing students with the knowledge and skills needed for adapting to this new age requires new and different educational goals and new, diverse and different tools and programs. Many experts recommend that students have rich and meaningful school experiences in all subjects, including the arts; develop strong written and oral skills; learn to use technology effectively; learn to “inquire” – to ask questions, process information, draw conclusions, think deeply and creatively; learn to apply their learning to solve complex problems; be able to develop long-term projects and make presentations; and work effectively in groups. Our students also need to have many choices, options and enrichment experiences that help them to develop and understand their individual talents, interests and goals.

Educational experts also recommend the use of diverse and multiple types of assessments rather than a single focus on one type of test. The typical standardized exam format (such as the Keystone exam) isn't suited to assessing many 21st century skills. Many types of student writing, project results and presentations, process and product results from research and investigative science, creative thinking process and outcomes, and the like should all be considered as part of the assessment mix.

Keystone Exams are not the answer

It is my view that, given a rapidly changing world and resulting new student needs, the focus of the State Board should be on helping schools and districts develop and implement a mix of new, visionary programs and assessments that will prepare students for living in this changing world. The State Board should encourage a variety of approaches and educational diversity that will create 21st century educational models.

Instead, the implementation of the standardized and traditional Keystone exams are a major distraction that takes time, energy and resources away from creating the new school programs and assessments students need to prepare them for college, career and citizenship. The Keystone exams “lock in” the current rigid system of high school education that will prevent schools from making the changes necessary to prepare children for a 21st century world, and eliminate much of the flexibility (electives) that help students discover their talents, interests, and motivations. Helping students build the kind of knowledge and skills they will need for “college, career, and life” readiness in this new age, and helping them develop their talents, interests and goals, should be THE primary goal of the State Board and Department of Education. Thanks in part to the shortsightedness of the Department of Education and the State Board, my prediction is that, 10 or 20 years from now, we will be asking why Pennsylvania’s students still are not adequately prepared to take their place in a 21st century world, and we will lose these years of potential progress to a new form of educational excellence.

The Keystone exam approach to educational excellence has significant drawbacks that should cause major concern, including the following:

- a. *The exams reinforce the idea that only one type of assessment – the traditional exam – is necessary to determine whether students are well prepared for a post high school experience.* Instead, high stakes assessments should consist of many diverse types of measures that assess many different aspects of knowledge and skills needed for living in a 21st century world. The culminating project, for example, measures whether students can define questions of interest to them, search for and process information, writing a long, coherent paper, synthesize data, make presentations – none of which can be assessed through Keystone exams! Other assessments that matter include many types of written products, research activities, science experiments, problem solving-creative challenges, participation in Socratic discussions, and the like.
- b. *There is no evidence that the implementation of the exams will make any difference in student graduation rates or success in College.* Studies of the effects of Regents exams in New York State have found no evidence that these exam requirements improve graduation rates or success rates in college.
- c. *The exams duplicate tests that already exist in most school districts across the Commonwealth.* Every district in the State already has a system of final exams for assessing students that effectively measure whether students have learned key algebra, biology and literature concepts and ideas. Why should these already existing tests be replaced with a whole new set developed by the State? The tests add little or no value to the already existing assessment system in most schools, and there are other ways to strengthen these tests, such as a system of sharing and evaluating tests across the Commonwealth.
- d. *The “one size fits all” exams throughout a diverse State like Pennsylvania will not meet the needs of many students and stifle the development of new 21st century curricular approaches.* Can Keystone exams used throughout the entire state meet the assessment requirements of a diverse population, a diverse set of students, and a diverse geography? The answer is definitely NO! For example, how can one test be used for honors courses and academic courses? Suppose a student takes an AP Biology course and doesn't take the AP exam, but passes the course. Will they still have to take the State test in that course area in order to graduate? (the answer is yes). Is that an efficient use of the student's time and energy?
The tests will also stifle the development of new types of programs. For example, STEM programs (Science, Technology, Engineering, Mathematics) integrate these four areas, focus on solving challenging problems as a way to stimulate learning, and involve students in a different way of learning. Given that the Keystone biology exam is in place, why would any district implement

STEM programs and jeopardize a student's ability to pass the Keystone exams that are focused around the separate disciplines?

- e. *The exams will be very costly to the State and districts, both in terms of financial resources and time and energy spent on its implementation.* This new system will require significant additional funding on the part of both the State and Districts over many years. The State will need to develop and pilot the exams, refine them and change them regularly, and score them every year. The implementation of these exams is also a very expensive unfunded mandate for Districts – initially, they will have to administer a minimum of *nine* tests a year (three tests three times a year) as well as parts of the tests, and find ways to support failing students in order for them to pass either all or part of the exams. Many will have to revise already excellent curriculums (including the purchase of new materials) in order to meet the “one size fits all” State requirements. This burden will only increase with the new changes to Chapter 4.
- f. *There is no assurance that the Keystone Exams will be high quality.* If many students fail the exams, it is possible (indeed, probable) that the exams will be “watered down”, and will eventually be designed for the “lowest common denominator” instead of meeting rigorous standards. It is even possible that the exams that are initially developed will not meet the rigorous standards of high quality that assure student understanding of these three subjects. Another possibility is that the exams will turn out to be confusing and not well designed.
- g. *The exams confuse test proficiency with course proficiency and experiences.* In these regulations, a student who fails the exam may still pass the course and a student who passes the exam may fail a course. For example, in biology, a student's grades represent a mix of course experiences. A student may do extremely well in lab settings, enough to offset scores on traditional tests. Many students are “test-averse” – they get very nervous when they are asked to take a high stakes test, but are able to do extremely well in a course setting. Students may pass an algebra, biology, and/or literature course, wind up with enough credits to graduate, and then not be able to graduate because they fail one or more Keystone exams. Other students may pass the exams but fail the courses. Still other students may pass the exams without taking the course, thus bypassing the significant experiences associated with writing, research projects, laboratory experiences, and other significant educational activities.
- h. *The project alternative cannot be made equivalent to what an exam measures, and its implementation will lead to a bureaucratic and logistical nightmare, both at the State and district levels.* The project alternative significantly weakens the purpose of the exam, and poses significant development and implementation challenges. From an educational perspective, it is virtually impossible to develop a project that will provide equivalent data to a test. A project, by definition, focuses on one aspect of

learning and cannot measure the breadth of knowledge that is assessed through a traditional exam. A project measures the proficient use of a different set of skills than an exam. Simply put, a project cannot measure the same things as an exam, so the logistics of putting the projects together and creating scoring guides that are equivalent to what is measured on the tests are impossible to do.

In addition, the execution and scoring of projects designed for failing students will probably turn out to be costly and a bureaucratic mess. Given the number of students in the State's schools, even a small percentage of high school students who fail the exam twice and take the project alternative will end up being a significant number. Imagine the amount of work, time, effort, and money this will take, for both the Department and for educators across the state, to mentor and evaluate these projects. This will probably turn out to be a logistical and bureaucratic nightmare. Is that what we want the Department and the Districts to focus their energies on in the future? Is the result worth the cost?

Finally, students who fail twice can demonstrate subject proficiency through the project. Does that mean that the course grade will need to be changed by the instructor, even if it is two years later? Can the student now claim that they should be given credit for a course that they failed several years ago? How confusing!!!

- i. *The literature exam will probably become a reading exam and has the potential of reducing the rich variety of literature courses that are used to interest, motivate and excite students to read.* Since different literature is taught all across the State, the chances are that the Keystone literature exam will in actuality become a reading test. Students will have to be assessed on passages from books that they have never read. They will read passages out of context. The test also has the potential to weaken, not strengthen, literature courses all across the State -- to create a focus on a few books and stifle the diversity of literature courses across the Commonwealth that are used to motivate students to read and meet the needs of students across the state who have diverse reading levels and different interests.

Frankly, another probably consequence of implementing these exams is that they will ***increase the dropout problem in Pennsylvania, rather than solve the problem.*** It is likely that more students will be pushed out of school simply because they fail one test, and we will inadvertently create an immense dropout problem in the State of Pennsylvania.

Eliminating the Project is a Big Mistake

Another key point of this commentary is that it is a big mistake to eliminate the culminating project requirement that has been part of the Chapter 4 regulations since the mid 90's. Ironically, the culminating project is better than standardized tests in measuring whether students have learned many of the significant skills

necessary for a 21st century world! Pennsylvania's districts that have taken this culminating project requirement seriously over the years are in the forefront of preparing students for a 21st century world. Instead of eliminating this requirement, the Board should strengthen its language and should assure that every high school student successfully completes a rigorous project and through it demonstrates competency in using many key 21st century skills.

In Conclusion...

For all of the above reasons, the Board and the department should scrap the development of the Keystone exams that are of dubious value, and strengthen the culminating project graduation requirement that actually assesses 21st century skills. Then the Board and Department should focus their attention on exploring and answering the following five questions:

- *What should be Pennsylvania's educational goals in order to prepare students for a 21st century world?*
- *In five, ten or fifteen years from now, what kind of educational system(s) should we have in place across the State that will best prepare students for the challenges of a new age? How can we begin to move Pennsylvania's educational system in the right direction in the short and long term?*
- *What educational programs do we need to develop in order to move Pennsylvania's schools into the 21st century? How should these programs be incorporated into and supported by Chapter 4 regulations? How can the list of goals already described in sections 4.11 b and c be revised, updated and strengthened? How can other sections be strengthened and revised to support the development of new programs and educational reform in the 21st century?*
- *How can the variety the assessments already described in the current Chapter 4 regulations (section 4.52e) be strengthened so that districts, schools, and the community at large will be able to determine whether students have developed the knowledge and the skills that will make them "college, career, and life" ready in this new age?*
- *How can we create a diverse mix of schools and programs that create schools of excellence for the future?*

An exploration of these questions should lead The Board and Department to strengthen and update the vision and mission statement that is already in Chapter 4, section 4.11 b and c, and review and strengthen the multiple assessment provisions for Districts and schools found in section 4.52 e of the regulations. The Board should also review, revise and update other sections, including the Standards section and the strategic planning section 4.13.

Resources originally allocated for the Keystone exams should then be used to:

- a. Encourage districts to use their long term planning process to update and revise mission statements, goals, visions, programs, assessments and professional development plans in order to meet 21st century educational challenges.
- b. Redesign and revise the State standards so that they have a laser like focus on 21st century understandings and core skills;
- c. Use technology to help schools implement, strengthen, and share a wide variety of student assessments that measure the successful achievement of 21st century knowledge and skills;
- d. Develop model, innovative curricula that schools and Districts across the state can use to change their programs;
- e. Identify model schools and innovative curricular, instruction, and assessment practices that support student learning of 21st century knowledge and skills;
- f. Support professional development training through the Intermediate Units, colleges and other entities on 21st century approaches to teaching and learning;
- g. Provide grants and other incentives that encourage districts and schools to experiment and work with new models and approaches.

Some Final Thoughts

I hope that State Board members will take pause and reconsider the current direction of Pennsylvania's educational regulations. I believe that State Board members and Department of Education staff should seriously consider the current societal changes and the needs of students in a 21st century world, and think about the misdirection of energy and resources that will occur through the implementation of Chapter 4 regulations in its current revised form.

My hope is that, in the long run, members of the Board and the Department's professional staff will, with the input of thoughtful community members and professional educators, revise and develop Statewide regulations, and support Statewide programs, in ways that truly help local districts and schools in Pennsylvania create programs that help prepare students for their future and meet the challenges of a 21st century.

The appendix on the next page consists of a petition from a number of Texas Districts to its State Board of Education that succinctly summarizes the direction that educators and education should be taking in the future.

APPENDIX

Recent Texas School District Petition to The Texas State Legislature

WHEREAS, the over reliance on standardized, high stakes testing as the only assessment of learning that really matters in the state and federal accountability systems is strangling our public schools and undermining any chance that educators have to transform a traditional system of schooling into a broad range of learning experiences that better prepares our students to live successfully and be competitive on a global stage; and

WHEREAS, we commend Robert Scott, Commissioner of Education, for his concern about the overemphasis on high stakes testing that has become “a perversion of its original intent” and for his continuing support of high standards and local accountability; and

WHEREAS, we believe our state’s future prosperity relies on a high-quality education system that prepares students for college and careers, and without such a system Texas’ economic competitiveness and ability and to attract new business will falter; and

WHEREAS, the real work of designing more engaging student learning experiences requires changes in the culture and structure of the systems in which teachers and students work; and

WHEREAS, what occurs in our classrooms every day should be student-centered and result in students learning at a deep and meaningful level, as opposed to the superficial level of learning that results from the current over-emphasis on that which can be easily tested by standardized tests; and

WHEREAS, we believe in the tenets set out in *Creating a New Vision for Public Education in Texas* (TASA, 2008) and our goal is to transform this district in accordance with those tenets; and

WHEREAS, our vision is for all students to be engaged in more meaningful learning activities that cultivate their unique individual talents, to provide for student choice in work that is designed to respect how they learn best, and to embrace the concept that students can be both consumers and creators of knowledge; and

WHEREAS, only by developing new capacities and conditions in districts and schools, and the communities in which they are embedded, will we ensure that all learning spaces foster and celebrate innovation, creativity, problem solving, collaboration, communication and critical thinking; and

WHEREAS, these are the very skills that business leaders desire in a rising workforce and the very attitudes that are essential to the survival of our democracy; and

WHEREAS, imposing relentless test preparation and boring memorization of facts to enhance test performance is doing little more than stealing the love of learning from our students and assuring that we fall short of our goals; and

WHEREAS, we do not oppose accountability in public schools and we point with pride to the performance of our students, but believe that the system of the past will not prepare our students to lead in the future and neither will the standardized tests that so dominate their instructional time and block our ability to make progress toward a world-class education system of student-centered schools and future-ready students; therefore be it

RESOLVED that the _____ District Board of Trustees calls on the Texas Legislature to reexamine the public school accountability system in Texas and to develop a system that encompasses multiple assessments, reflects greater validity, and more accurately reflects what students know, appreciate and can do in terms of the rigorous standards essential to their success, enhances the role of teachers as guides to instruction, and nurtures the sense of inquiry and love of learning in all students.

PASSED AND APPROVED on this ____ day of _____, 2012.

A short bio of the author of the commentary

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Elliott Seif began his career as an educator in 1965, as a social studies teacher on Long Island, New York. I was also a Professor of Education at Temple University and the Director of Curriculum/Instruction Services for the Bucks County Intermediate Unit, and now am an independent educational consultant, author, and trainer with a specialty in curriculum reform. I also volunteer consult with three Philadelphia School District high schools. My Temple University and Intermediate Unit work included extensive involvement in the development and implementation of Chapter 5 and 4 regulations, as well as the Pennsylvania Standards, and significant work in helping schools implement curricular, instruction and assessment changes designed to better prepare students for 21st century living. I hold an MAT degree from Harvard University and a PhD in educational research from Washington University in Saint Louis.

Elliott Seif has also created a website – www.eralearning.org -- that provides information on a 21st century educational mission, vision, and practical information, ideas, and resources for their implementation.