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October 27, 2012

Independent Regulatory Review Commission (IRRC)
333 Market Street
14th Floor
Harrisburg, PA 17126-0333

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IRRC

2012 NOV -2 AM 9: 52

RE: Chapter 4 Regulations Regarding High School Graduation Requirements

Dear Sir/Madam:

My husband and I are residents of the Tredyffrin/Easttown School District, and currently have one child attending elementary school in T/E, with a preschooler who will begin Kindergarten in T/E next fall. We are writing to express our concerns about the proposed changes to Chapter 4 regulations regarding high school graduation requirements. We are not in favor, nor do we agree with the proposed changes.

Students in Tredyffrin/Easttown School District have historically experienced high degrees of success in college and the workplace, and we are concerned that the addition of high-stakes exit exams may have the unintended consequence of hindering students who are proficient, but do not always demonstrate the fullest extent of their skills in a traditional testing environment. Having been a past teacher, I can attest to the number of students who are fully proficient in a subject area, however are not strong in standardized testing. The proposed changes to the Chapter 4 regulations will undoubtedly negatively impact these students.

Beyond our opposition to the concept of graduation exams, we are further concerned by the following components of the proposed regulations:

- In addition to the Algebra 1, Literature and Biology Keystone Exam requirements, the State plans to add an exam in English Composition for the class of 2019 and beyond and a Civics and Government exam for the class of 2020 and beyond. Two separate tests in English Composition are unnecessary and a poor use of taxpayer resources. A Civics and Government exam will require expensive restructuring of high school curricula across the State because many local districts will need to move the related course out of the junior or senior year to an earlier year. The costs to local taxpayers for textbooks alone may exceed \$100,000 to facilitate such a change.
- The requirement of three years of instruction prior to an alternative assessment places an undue burden on students, limits their ability to choose other courses, and could harm the college admissions process. The alternative assessment path should be made available at an earlier point. There are some students who need an alternative assessment option from the onset. It is unfair to penalize those who need a different method in which to demonstrate their proficiency.

- Will this unfunded mandate permit flexibility for high-performing schools with a record of success and also provide additional support for struggling schools? Is this another State remedy that assumes “one size fits all?”
- Our school district is struggling with financial “sustainability” as the State continues to reduce its contributions to local districts, places limitations on district’s ability to raise revenue, and then adds another layer of financial cost with no state assistance.

We urge you to amend the proposed Chapter 4 regulations to reflect these concerns, as we whole-heartedly believe they will negatively impact our students, our teachers, our community, and our district as a whole.

Thank you for your time.

Sincerely,




Stephanie & Walt Smith
719 N. Valley Forge Road
Devon, PA 19333