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Pennsylvania Association of School Administrators
2608 Market Place ~ Harrisburg, PA 17110
(717) 540-4448 FAX: (717) 540-4405 www.pasa-net.org

November 5, 2012

Ms. Karen Molchanow
Executive Director
State Board of Education
333 Market Street
Harrisburg, PA 17126-0333

Dear Ms. Molchanow:

On behalf of the Pennsylvania Association of School Administrators (PASA), whose members include school district superintendents and other school system leaders, we offer the following comments regarding the proposed regulations published by the State Board of Education in the October 6, 2012 edition of the *Pennsylvania Bulletin*.

First, we would like to express our appreciation for efforts by the Board to address several of the serious policy and implementation challenges that the current regulations pose to both the Department of Education and school districts. PASA supports removal of the requirement that the score from a Keystone Exam count as one-third of the final course grade, the reduction in the number of mandated Keystone Exams and the delay of the effective date for the new high school graduation requirements. PASA also supports the elimination of the culminating graduation project requirement.

While PASA supports the changes described above, we have serious concerns about several of the other proposed changes.

First among these is the major policy shift that changes the fundamental function and purpose of the Keystone Exams from serving as end-of-course final exams to high-stakes, exit exams. Under the proposal, students must pass each mandated Keystone Exam, regardless of all other academic achievements, to qualify for a high school diploma. While alternative pathways are provided, this will require students to redirect their academic plans away from their planned educational goals and objectives and instead place them into a holding pattern composed of remediation, test retakes, project-based assessments and ultimately a very real potential for high school completion without benefit of a high school diploma. Unlike the high school exit exams administered in most other states, which permit anywhere from four to six retakes, these regulations limit the number of retake opportunities afforded to students, thereby reducing their chances to achieve success.

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While the State Board and Department of Education seeks to move forward to implement this program of high-stakes exit exams and new high school graduation requirements, it is important to note that four other states that have longstanding exit exam policies have recently moved away from requiring students to pass one or more exams to receive a high school diploma. Tennessee, North Carolina, Alabama and Georgia will continue to administer end-of-course tests, but those tests will no longer be required as a requirement to qualify for a high school diploma. In addition, both New Jersey and Ohio are currently considering whether to maintain their end-of-course tests in subjects other than English language arts and math. Louisiana has already decided to eliminate testing in all but these two subjects.

As an alternative to converting the Keystone Exams into high-stakes exit exams, PASA suggests the Board instead maintain their original purpose of serving as end-of-course tests. The Board should require the Department to return the test scores of all test takers within ten days of test administration, and permit each school district to individually determine the weight of the test when determining whether a student has successfully completed the course or qualification for a high school diploma. This will permit schools to consider Keystone Exams as one of several multiple measures in determining each students' readiness for high school graduation against its standards of post-secondary and workforce readiness.

PASA also wishes to express serious concerns that the Department has made changes to its testing program for the 2012-13 school year without obtaining either state legislative or regulatory authority or approval from the United States Department of Education. The Department is switching from use of the Pennsylvania System of School Assessment (PSSA) to the Keystone Exams as the basis for determining Adequate Yearly Progress under the federal No Child Left Behind Act. This major policy change is contrary to the Department's own regulations as outlined in Chapter 403 at 22 Pa Code § 403.3(d)(1)(i).

It is also contrary to the definition of "Keystone Exam" as defined in Chapter 4 which states "Keystone Exams-State-developed end-of-course exams." The new policy requires all students enrolled in eleventh grade to take the tests, regardless of whether they are currently enrolled in the tested subject course or whether they have ever taken the course or related material assessed by the Keystone Exams. The Department is requiring schools to administer the Algebra I, Literature and Biology Keystone Exams to every student enrolled in 11th grade unless a student has already taken the subject Keystone Exam. This action is without the legal authority.

In addition, this policy change was not announced until late July 2012 when districts were already proceeding to establish student course schedules, class assignments and ordering instructional materials for the new school year. While this policy change will not directly impact the eleventh grade students who are to be tested in 2012-13, it will directly impact schools and school districts as the Keystone Exams will be used in place of the PSSA to determine Adequate Yearly Progress. Failure to make Adequate Yearly Progress has both financial and other negative consequences for schools and school districts.

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PASA urges the Board to revisit the proposed regulations and to rewrite them based upon principles that reflect the interests of students, schools and sound education policy rather than that of the current state budgetary priorities.

Thank you and members of the State Board of Education for addressing several of the concerns previously expressed by PASA members on this issue and we look forward to continuing the dialogue as the Board works to draft its final-form regulations.

Sincerely,
Jim Buckheit
Executive Director