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November 12, 2013

The Honorable Silvan B. Lutkewitte, III  
Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

**Re: Final-Form Regulations #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 relating to academic standards and assessments. I urge the Independent Regulatory Review Commission to approve the final-form regulations that would adopt the Pennsylvania Core Standards and aligned assessments, including Keystone Exams.

PPC has been working to improve Pennsylvania's high school graduation requirements for more than seven years. The issue is still as important today as it was back in 2005, when I served on the Governor's Commission for College and Career Success. For too long, Pennsylvania has been graduating tens of thousands of students each year who received their diplomas despite failing to demonstrate proficiency in reading and math. One-third of all students who graduated in 2012 (the latest data available), or about 44,000 kids, did not score proficient or advanced on the 11<sup>th</sup> grade PSSAs or the 12<sup>th</sup> grade retake. These students come from all types of schools throughout the state – not just our most distressed schools. In fact, in 2012, there were 428 school districts and 74 charter schools and career and technical centers that graduated at least 20 percent more students than scored proficient or advanced on the 11<sup>th</sup> grade PSSAs.

These important educational reforms will adopt the Pennsylvania Core Standards. These standards, informed by Pennsylvania teachers, are rigorous, internationally benchmarked academic standards in English and math that are aligned to the Common Core and will better prepare our students to be successful in postsecondary education (whether that is a 2- or 4-year college, technical school, industry credential program, apprenticeship, etc.), the 21<sup>st</sup> century workforce, or the military. The proposed regulation also eliminates some state mandates and further bolsters Pennsylvania's longstanding tradition of local control in our school districts.

The regulation adopts assessments that are aligned to the Pennsylvania Core Standards, including Keystone Exams in English literature, algebra I, biology, composition and civics/government. The Keystone Exams, which students take immediately following the course, have many strong advantages over an assessment such as the 11<sup>th</sup> grade PSSA as a tool to gauge student readiness:

- Keystone Exams assess more focused and in-depth content.
- Because Keystone Exams are given at or near the end of a course, the content is fresher and more relevant to the students, enabling educators to get a better sense of what a student really knows.

- Keystone Exams are administered closer to the point of instruction so teachers can quickly identify content areas where students are struggling and adjust teaching strategies to provide more focused help to students.
- Students who fail to score proficient on the Keystone Exam have an opportunity to receive supplemental instruction and re-take the Keystone or a part of the Keystone Exams (often referred to as modules). If they are still unsuccessful, students may then move to a project-based assessment to demonstrate proficiency.
- Because the exams will be required for graduation, students will be more likely to take the Keystone Exams seriously and try to do their best.

In addition, Keystone Exams are a critical component of Pennsylvania’s new teacher evaluation system. The Keystone Exams, along with the PSSAs in grades 3 through 8 are used in evaluating multiple measures of student achievement in the new system to evaluate teachers.

This final-form regulation makes some important improvements to the commonwealth’s current regulations:

| <b>If IRRC <u>approves</u> the final-form regulation</b>  | <b>If IRRC <u>does not approve</u> the final-form regulation (current regulations)</b>  |
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| Pennsylvania will adopt the PA Core Standards in English and math, which were informed by PA teachers.  | Pennsylvania will have the national Common Core State Standards, which were adopted in 2010 and took effect on July 1, 2013.  |
| Five Keystone Exams will be phased in through 2020. Students will be required to demonstrate proficiency on the exams (or other approved assessment) to graduate beginning for the class of 2017. | The PA Dept. of Education (PDE) will be required to develop and implement 10 Keystone Exams. Students will need to take six of the 10 Exams, they will count for at least one-third of their final grade, and they begin to be graduation requirements in 2015. |
| Schools district will be required to provide supplemental instruction to struggling students in the five courses with Keystone Exams.   | School districts will be required to provide supplemental instruction to struggling students in the 10 courses with Keystone Exams.   |
| Local chief school administrators can grant graduation waivers to students for extenuating circumstances.   | Only the Secretary of Education can grant graduation waivers to students for extenuating circumstances.   |
| A state-mandated senior project will be eliminated.   | All students will continue to be required to complete a state-mandated senior project to graduate.  |
| A state-mandated strategic planning requirement for school districts will be eliminated.  | School districts will be required to continue developing state-mandated strategic plans.  |

Again, PPC strongly supports the final-form Chapter 4 regulation as a sensible approach to make certain the commonwealth’s students demonstrate proficiency of rigorous PA Core Standards and are prepared to transition to postsecondary education, 21<sup>st</sup> century careers, military service and productive citizenship. I urge the IRRC to approve the regulation.

Sincerely,



Joan L. Benso  
President and CEO