

**Analysis of PDE-PSBA Joint Agreement on High School Graduation Requirements** [www.marsrrservices.com](http://www.marsrrservices.com) **March 9, 2009**

More than a decade ago, Pennsylvania made efforts to mandate the PSSA as a graduation requirement for high schools. Now, ten years later, it's still being proposed, but, as an option in a newly wrapped package given a new name which went from Graduation Competency Assessments to the "Keystone Exams". *Under the newly wrapped package, despite being voluntary, "school districts can eliminate the requirement for administration of the Keystone Exam if it relies on a validated local assessment the PSSA to determine eligibility for graduation".* (page 4 of the PSBA 3/4/09 "PSBA Announces Agreement on New Approach to Graduation Requirements").

New Approach? This is what the PDE wanted ten years ago. It's just a different way to force districts to mandate the PSSA as a graduation requirement by packaging the options differently to give the illusion to unsuspecting districts that there is actually a choice in these matters. So, in lieu of taking a series of five separate exams (Keystone Model) in five different core subject areas, if you take the PSSA (one exam) and passed with proficiency and the PSSA is utilized as the District's graduation requirement...you've fulfilled the State's mandate. Said another way: If a district utilizes the PSSA as its local assessment and utilizes its local assessment as a graduation requirement in its strategic plan, and the student passes the local assessment with proficiency, then it fulfills the State's mandate. See how this works?

Let's compare the old model against the new model and note the differences:

GCA's would be administered in the following core subject areas:

- Mathematics: Algebra I, Algebra II, and Geometry
- English: English composition and English literature
- Science: Biology and Chemistry
- Social Studies: American History, Civics and Government, and World History

Students who take the GCAs would need to score proficiently on six of the ten tests - two English, two math, one of the two sciences, and one social studies.

In addition, all students would still be required to take the PSSA to determine Adequate Yearly Progress under the NCLB Act.

Keystone Exams would be administered in the following core subjects:

- Mathematics: Demonstrate proficiency on two Math tests
  - English: Demonstrate proficiency on two English tests
  - Science: Demonstrate proficiency on one of the two science exams.
- More exams would be developed beyond the core five series, just as the GCA. In addition, all students would still be required to take the PSSA to determine Adequate Yearly Progress under the NCLB Act.

Each GCA would be administered at least three times each year (fall, spring, and summer) Students could take each test up to five times through 12th grade. High school seniors would have the GCA results at least ten days prior to graduation. Students who do not pass the tests would not graduate with their class, regardless of their academic record. They would be offered remediation and could continue to retake the GCAs for an unlimited number of times. The Keystone Exam proposal permits districts to request alternative times of offering the exams to students beyond the three times of the GCA model. To suggest this is a big change from the preceding package is a minor difference. Similar language pertaining to the GCA's regarding time frames for test administration is included in the new Keystone proposal as well as minimal difference pertaining to the scoring timeframes. PDE will control the release of exam scores upon publishing the guidelines and procedures for those districts requesting alternative times. Under the Keystone Exam proposal, mandated remediation will be a costly unfunded mandate and runs counter to our membership's legislative platform guiding our organization. Mandated remediation was not a part of the GCA model, though it was likely to be initiated at and through the local control level regardless based on PSSA performance and scores of students and schools, building by building.

PSSA, GCA/Keystone and validated local assessment scores would be included on student transcripts. No change.

As one can note above, the proposed Keystone Exams will likely increase the amount of time students take tests in lieu of the argument that they decrease testing. In fact, with multiple tests being administered multiple times throughout the year, and then retakes, testing will likely increase. As demonstrated above, why would a district pay to administer multiple tests and students take 5 tests when they can take 1 and be done? As consistent with the GCA Model, the Keystone Exams will still require students to take the PSSA to meet determination of the NCLB's Adequate Yearly Progress. So, in reality, we have students taking 5 Keystones+ 1 PSSA= Six Tests (for now) in lieu of taking 1 Test (PSSA) and being done. What model do you think schools and students will want? They'll eliminate the local assessment, despite the State Keystone Model offering up to pay half the cost for validation, and make the PSSA the local assessment (so much for PSBA's local control concerns) and make the PSSA the district's graduation requirement....either on its own merit or by adopting it as the district's local assessment option. See how inexpensive and easy that was for the PDE to get what they wanted to begin with? Afterall, why and what incentive is there for districts to utilize the local assessment option, **pay half** to have it validated every 6 years in lieu of 5 years (another minimal difference) only to administer, proxy, and interrupt the regular education schedule annually, if all can be accomplished by mandating the PSSA as a graduation requirement? It appears to be a contradiction that PSBA lobbies for unfunded mandates according to the legislative platform, agreed to the provision of the agreement which requires a cost associated for local assessment validation if the district elects to choose this option. ( A local control option with a twist of self imposed unfunded mandate).

Section 4.51 of the Chapter 4 Education Regulations read as follows:

(In the event that a school entity chooses to use a local assessment to determine whether a student is proficient, the local assessment must be included in the school entity's strategic plan. Local assessments may be a single exam or a combination of assessment strategies such as those described in Section 4.52(d) of the Chapter 4 regulations on Standards and Assessments. There are no specific guidelines related to how a school entity is to determine proficiency on a local assessment, however, proficiency is expected to be comparable with proficiency on the PSSA. Over time, the comparability or degree of alignment between the PSSA and a local assessment will be demonstrated via repeated administrations of the two assessments. The existence of large numbers of students not achieving proficiency on the PSSA who are deemed proficient by a local assessment will strongly suggest that the local assessment is not aligned with the PSSA or the PSSA's meaning of proficiency. In the event that it becomes apparent that there is a disparity between the level of proficiency on local assessments and that of the PSSA, further regulation related to local assessments may become necessary).

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No where in Chapter 4 have the regulations ever suggested that the local assessment be criterion referenced. Furthermore, no where has the GCA Model suggested that local assessments be criterion referenced, it is not even mentioned as a prerequisite condition for the RFP's for the GCA's themselves nor was it mentioned by the PDE's July 28<sup>th</sup>, 2008 memo sent to school board presidents, superintendents, and I.U. Executive Directors informing them that the PDE would begin a process to validate local assessments that are used for determining high school graduation. (This memo was sent out post IRRC issuing their comments). Furthermore, the PSSA is a "criterion-referenced" test which acts as an internal audit, because the school system is only ever tested against itself and its standards...children, teachers, and districts are compared only to standards and not to each other. Which is one way we can identify failing school districts and students.

For the PSBA to insinuate on their chart, that the structure of the local assessment was once criterion referenced as mandated under the GCA Model is inaccurate and to go onto suggest that the Keystone Exam Proposal has no language that requires local assessments to mirror state tests as something new and different is misleading. After all, there is a broad requirement for local assessments to be aligned with state academic standards which does suggest it to mirror or be comparable to the state assessment in rigor as noted above in Section 4.51.

*That requirement is listed above in Section 4.51 of the Chapter 4 Education Regulations, it is not necessary for it to be inclusive of the Keystone Exam Proposal.*

The option to use "multiple measures with local assessments" was also not a different or new factor when looking at the side by side comparison of PSBA's chart between the GCA Proposal and the Keystone Exam Proposal. Local Assessments have always been

available to use multiple measures as outlined in Section 4.52 of Chapter 4. The GCA/Keystone Model have no bearing on that fact as local assessments may use a variety of assessment strategies. In fact, the PDE's July 28<sup>th</sup>, 2008 memo requesting local assessments by districts was being initiated to "collect and catalogue" the various local assessment approaches utilized by school districts, specifically looking at what was being utilized for the graduating class of 2007-08. For anyone to suggest this is a "gain" in the win column for school districts as suggested on this chart is misleading.

Examination of the PDE-PSBA proposal indicates the only real difference in the entire Keystone Exam Package from the GCA Model are the following provisions:

- Cost of validation of local assessment is evenly divided between the district and PDE
- Establishment by the PDE for a Local Assessment Validation Committee
- Renewal of validation has been changed from 5 to 6 year cycles
- New requirements take effect in 2014-2015 in lieu of 2013-2014 school year

There should be many concerns associated with establishing a new layer of bureaucracy in the PDE through the facilitation of this new committee. Factors related to accountability, appeals process, local control erosion, subjectivity, costs and affordability, transparency issues, how will local assessments be compared to the PSSA? Reliability factors? Degree of rigor compared objectively? The revised regulations give the Secretary of Education new authority to direct school districts to discontinue use for of graduation assessments not validated. (Loss of Local Control) which was not contained in the original package.

Despite a differently wrapped package, the facts relative to the matter still remain constant and withstand the scrutiny of pressure while positions on the issue change. It is my hope that the Senate and House will stay focused on the facts related to this matter despite the joint compromise agreement between the PSBA and the administration. Unfortunately, the Governor's Administration will utilize PSBA's misstep as support for state imposed graduation assessments and allow it to divide our membership causing chaos and confusion in upcoming state budget negotiations.

So much has been compromised...our membership's trust amongst one and other, the integrity, trust and credibility of our organization at the Capitol severely damaged. What ever the gain, nothing is worth surrendering your principles, yet we had a handful of people who allowed the process to exclude all others and proceed forward making a decision for 4500 members statewide while we were winning this legislative battle. Our own association took it from the field and waved the white flag without asking its army out on the battlefield fighting the good fight. It will take great effort and time to piece back together what once was an army of advocates for students and schools. Our members are the least of our casualties... we should keep focus on the students who have the most to lose from this experience and may end up being our biggest casualties yet.

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