



Pennsylvania Partnerships for Children

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David S. Feinberg
Chair of the Board

Good morning Chairman Wittig and members of the State Board of Education. I am Joan Benso, President and CEO of Pennsylvania Partnerships for Children (PPC). PPC is a statewide non-partisan, independent child advocacy organization committed to improving the health, education and well-being of children in the commonwealth. PPC's vision is to make Pennsylvania one of the top 10 states in the nation to be a child and to raise a child.

Thank you for the opportunity to appear before you today to discuss the proposed Chapter 4 regulations. This proposal would substantially diminish the commonwealth's commitment to assure our high school graduates are prepared for postsecondary education or the 21st century workplace. PPC strongly urges the State Board to reconsider these changes to Chapter 4 that have been proposed in light of the commonwealth's fiscal situation and the need for districts to have more time to align their curriculum to ensure that students are successful.

PPC has been working on high school graduation requirements for more than six years. It's as important now as it was in 2005, when we began to advocate for a common-sense assessment system to ensure students have achieved the state's academic standards when they graduate and hold both school districts and students accountable for results.

The data that we reviewed at that time indicated a problem that still concerns us today. More than 21 percent of Pennsylvania teenagers (nearly 35,000) failed to graduate with their class in 2010, and too many of those students who graduated did so without adequate assurances that they achieved the state academic standards and had the education foundation required to be successful in postsecondary education or the workforce.¹ More than 40 percent of Pennsylvania's high school students (more than 53,000 kids) graduated in 2010 without scoring proficient or advanced on the 11th grade Reading and Math PSSAs or the 12th grade retake. This troubling trend is not confined to our most distressed schools. There are 455 school districts as well as 61 charter schools and career and technical centers that graduated at least 20 percent more students than scored proficient or advanced on the 11th grade PSSAs.

Let's focus on this data before we move on. For the class of 2010, more than 88,000 young people in Pennsylvania either failed to graduate with their class or graduated without demonstrating proficiency on the PSSAs. We need to do more – not less - to ensure graduates are ready for the challenges of postsecondary education and/or careers. *The regulations under consideration do less.*

Assuring our high school graduates are postsecondary and workforce-ready is also important to the economic vitality of the state. There is a disconnect between the educational needs of Pennsylvania's employers and the educational attainment of our workers. Seventy-five percent of Pennsylvania's jobs require education beyond high school, yet only 55 percent of workers possess this level of education attainment.ⁱⁱ This regulatory body is critical to assure we can close the education gap needed for a vital workforce.

Throughout the process to revise Pennsylvania's graduation requirements, PPC remained steadfast in the fundamental elements required of any proposal to gain our support. They include a reliable and consistent assessment system (with accommodations for special needs children) that ensures more of our students graduate from high school ready for postsecondary education and the workforce, supports for struggling students including mandatory supplemental instruction, and tools for teachers and schools. Unfortunately, while the proposed Chapter 4 regulations make some improvements, particularly to supplemental instruction and the project-based assessment, the regulations ultimately fall short on maintaining a reliable and consistent assessment system.

The proposed regulations clarify that students must *successfully participate* in supplemental instruction before re-taking a Keystone Exam and before being eligible to participate in the project-based assessment. This results in shared accountability for both the school district and student -- the district is required to provide supplemental instruction, and the student is now required to successfully participate in the supplemental instruction before re-taking the entire Keystone Exam or a module of the exam.

The proposal also limits the project-based assessment option to 12th graders who have taken the course, have met the school district's attendance policy, and as mentioned, have satisfactorily participated in supplemental instruction. This change prevents students from jumping straight to project-based assessments. In addition, project-based assessments will be scored by a statewide (as opposed to regional in the current regulations) panel of teachers, principals and curriculum specialists using protocols and rubrics developed by the Department of Education to ensure rigor and consistent scoring. This revision provides added protection that the project-based assessment will be a meaningful measurement of student achievement.

Even with these positive changes, PPC has significant concerns with other elements of the proposed regulations. As you know, current regulations passed in 2009 require students in the classes of 2015 and 2016 to demonstrate proficiency in Algebra I, Biology, Literature and English Composition with a final Keystone Exam, which would count for one-third of the final course grade. For the classes of 2017 and beyond, requirements are expanded to include passing an additional math course (Algebra II, or Geometry) and passing one social studies course (Civics and Government, U.S. History or World History).

The current regulations also protect local control and provide options for districts to measure accountability. In lieu of the Keystone Exams, students may demonstrate proficiency in these subjects via an independently-validated local assessment, or

Advanced Placement or International Baccalaureate Exams, or use Keystone Exams as a stand-alone graduation requirement.

The proposed regulations significantly reduce the number of Keystone Exams from 10 to three. They eliminate the English composition Keystone. Composition is a key component of the English Language Arts Common Core academic standards that Pennsylvania plans to fully implement next year and effective writing is an important skill required in postsecondary education and the workforce. The proposed regulations also eliminate two of the three mathematics Keystone Exams – Geometry and Algebra II; the Chemistry Keystone Exam; and all three of the Social Studies Keystone Exams.

We cannot support this proposal. Pennsylvania must do more to ensure our young people are prepared for successful lives and can compete in a global workforce. Reducing the number of Keystone Exams from 10 to just three – Literature, Algebra I and Biology – fails to ensure our schools are preparing every student for postsecondary education and 21st century occupations.

PPC understands the difficult fiscal environment the commonwealth faces. Although our preference is to keep the assessments in the regulations intact, we appreciate that it may be challenging at this time to develop and implement all 10 Keystone Exams in the timeframe required so that the assessments are fully implemented as graduation requirements in the 2016-17 school year. Therefore, PPC is willing to compromise and support a plan that would either:

1. Push out the implementation timeline for all 10 exams by adding one assessment every year after the 2014-15 academic year and requiring students to graduate demonstrating proficiency on at least five Keystone Exams beginning in the 2018-19 academic year. We would propose that the next two exams to be advanced be English Composition and Civics. Beginning in the 2020-21 academic year, students should graduate demonstrating proficiency on six of the seven Keystones Exams that should be developed by that date, continuing the current requirement of proficiency on six exams. The remaining three Keystones should be developed in the following three fiscal years. This would keep the assessments intact as they appear in the current regulations and simply extend the timeline for their development and implementation.
2. Reduce the number of Keystone Exams from 10 to five – Literature, English Composition, Algebra I, Biology, and Civics and give the commonwealth and its public schools more time to develop and implement the assessments. We would propose that students be required to demonstrate proficiency on all five of the above exams beginning with the graduating class of 2018-19 providing two additional years beyond this recommended regulatory package for full implementation.

The proposed regulations extend the implementation timeline from 2014-15 to 2016-17, in part to give school districts more time to align their curriculum with the assessments and prepare students to be successful. PPC does not support delaying new graduation requirements for two more years *and* only assessing students in three subject areas – especially when the vast majority of Keystones that we would require as graduation requirements are well underway. English Composition exam was field tested last spring

and the Civics exam is in development. That is why we propose to require at least these five exams as graduation requirements beginning in the 2018-19 academic year.

Extending the implementation timeline gives the commonwealth a period of time to allow state revenues to recover from the recession to assure that funding can be available to complete the development of the exams and for the ongoing costs associated with administering them – such as printing, distributing, scoring and reporting. It also provides districts more time to align curriculum and prepare students. Some of this can begin immediately as the English Composition curriculum and related diagnostics are already available for district use.

The proposed regulations continue to allow for an emergency waiver by the Secretary of Education if a student is not successful in completing a project-based assessment. Although PPC agrees with this provision under very limited special circumstances, such as an extended student illness or a death in a student's family, we are concerned that the broad power of the emergency waiver could inadvertently result in it becoming a "back door" for too many students to graduate without achieving the state academic standards.

PPC supports the proposed change that requires any school district, career and technical center (CTC), charter school or cyber charter school that submits waiver requests for more than 10 percent of students be required to submit an action plan outlining improvements that will be implemented to address the situation. However, we think the regulations need to go further to ensure the emergency waivers are not misused. PPC strongly suggests that language be included that would identify the accountability measures used to assess student proficiency for graduation. Districts, CTCs, charter schools and cyber charter schools should be required to annually report on the number of students that demonstrate proficiency and graduate based on:

- Keystone Exams
- Advanced Placement (AP) and International Baccalaureate (IB) exams
- Validated local assessments
- Project-based assessments
- Emergency waivers

PPC appreciates the opportunity to testify today. In closing, I would ask you to remember the importance of why the State Board tackled this difficult issue and enacted these regulations. It was to ensure that all our students – regardless of what high school they attend in the commonwealth – graduate with the educational foundation they need to successfully transition to postsecondary education and ultimately secure a family-sustaining wage occupation.

Please don't retreat on the commitment we made to young people by passing this proposal as it's currently written. Let's make sure our high school diplomas guarantee our graduates have the skills they need to be successful in the next chapter of their lives.

Thank you. I'd be happy to take any questions you may have.

ⁱ PA Department of Education; 4-Year Cohort Graduation Rate; 2009-2010

ⁱⁱ Jobs – U.S. Bureau of the Census and PA Department of Labor & Industry, Center for Workforce Information and Analysis, 2008; Educational Attainment – U.S. Bureau of the Census, 2007-09 American Community Survey PUMS; 3-year file