



**Written Testimony to
The Pennsylvania Senate Education Committee
Regarding Chapter 4 Keystone Exams**

**Submitted by
Pennsylvania School Boards Association
August 26, 2013**

The Pennsylvania School Boards Association appreciates this opportunity to provide comments to the Senate Education Committee on the proposed changes to the Chapter 4 specific to high school graduation requirements and the implementation of Keystone Exams.

PSBA supports the efforts of the board to implement PA Core Standards and to refine graduation requirements but believes that further adjustments to the proposed Chapter 4 regulations should be considered. The state and school districts have been working hard to prepare for the challenges of the new requirements, and we believe that it is appropriate for the State Board and Pennsylvania Department of Education (PDE) to carefully weigh the profound impact that these rules that will have on students and schools.

As school districts begin to implement the Pennsylvania Core Standards and provisions for new graduation requirements beginning with this year's 9th graders of the Class of 2017, fiscal concerns are a reality and there are policy considerations that must be addressed. PSBA agrees with many of the proposed changes that have been incorporated into the Chapter 4 proposal and views them as necessary improvements. However, questions and concerns remain regarding some aspects of implementation as well as with the ongoing costs that will continue. Both the state and local schools should be able to implement their duties under them efficiently and cost effectively. Most of all, the regulation should benefit students and enable them to be better prepared for post-secondary education and the workforce.

The State Board has suggested that the proposed regulation will not impose any new costs on school districts. PSBA disagrees. Districts already face increasing costs to continue to adapt their curriculum and instruction to be aligned with the new academic standards, and to have updated textbooks and materials. There are professional development and training costs; and there are student remediation costs. Districts will have to develop extensive recordkeeping systems to match students with the Keystone Exams that have been successfully completed and those for which remediation will be necessary in addition to the various modules that have to be taught in remediation classes and to ensure that students needing remediation in certain modules are enrolled in the proper classes. Districts will also incur the costs related to the project-based assessments that are discussed later in these comments. Suggesting that that no new costs will be incurred is false and misleading. A true fiscal analysis should be completed.

At this time, we would like to comment on these specific issues:

1. PSBA supports the elimination of the provision for a Keystone Exam score to be one-third of final grade.

When the Chapter 4 regulations were finalized in 2009, a consistent concern remained regarding the use of the Keystone Exam score as 33% of a student's final course grade as well as the provision that would give a "0" grade to any student scoring "below basic" on the Keystone Exam. In fact, this provision was one of the key reasons that caused PSBA's Board of Directors to adopt a resolution in July 2009 opposing Chapter 4. Although the regulation was subsequently approved, the statewide opposition from PSBA and the larger education community to this issue continued. In September 2010, the State Board adopted a policy that created options for school districts that wanted to use one or more of the state-developed Keystone Exams but did not want the scores to count as one-third of the course grade. The policy would allow districts to determine the weight of the Keystone Exam scores for course grades, or to completely separate scores from course grades altogether. Wisely, the proposed changes to Chapter 4 eliminated the language for the scoring and use of Keystone Exam results as part of a course grade. PSBA believes that school leaders should be allowed to determine if, and how, the score may be counted for graduation purposes.

2. While PSBA supports the elimination Keystone Exam scores as part of a course grade, the use of the exams to determine whether to award or withhold a diploma makes them high-stakes exit exams. PSBA believes that the State Board should retain the Keystone Exams but modify the implementation to lessen their high-stakes impact and provide additional flexibility.

PSBA supports the use of Keystone Exams as end-of-course (EOC) assessments; they can serve as an important measure of student performance in core content areas. Although Keystone Exams are labeled as end-of-course exams, they are, in fact, also high-stakes exit exams. PSBA believes that assessments don't have to have high-stakes consequences to send meaningful signals to students and schools. Testing should inform and enhance instruction, not impede instruction. With this in mind, the association suggests the following options for the Board's consideration:

- Maintain the use of Keystone Exams as a graduation requirement but allow school districts to determine the weight needed to receive a diploma.
- Administer Keystone Exams for federal accountability requirement purposes only.

In either case, the regulations should maintain the requirement for remediation for students who need extra help. The state could create incentives for schools to reach varying levels of student performance.

A report issued in September 2012, "[*State High School Exit Exams: A Policy in Transition.*](#)" by the Center on Education Policy (CEP) at George Washington University, notes that states are now rethinking how they use exit exams and end-of-course assessments. Regarding the use of end-of-course (EOC) exams, CEP reports:

"End-of-course (EOC) exams continue to grow in popularity. In recent years, several states have shifted from using comprehensive exit exams, which assess multiple subjects on the same test, to EOC exams, which test students' mastery of the content in a particular course. Nine

states required students in the class of 2012 to pass EOC exams to graduate, an increase from the two states with EOC exit exams in 2002. An additional six states required students in the class of 2012 to take EOC exams that are not considered exit exams because students do not have to pass them to graduate.”

The CEP report also notes that many states with current or planned exit exams offer alternate paths to graduation for general education students who fail the state exit exam, but specific options and requirements vary greatly from state to state. For example:

- 12 states allow students to take an alternative assessment or substitute scores from another assessment, such as the ACT or SAT. (*Arkansas, Arizona, Florida, Georgia, Massachusetts, Mississippi, New York, Oklahoma, Oregon, Rhode Island, Virginia, Washington*)
- 8 states permit students to use portfolios of coursework or end-of-course projects to demonstrate their knowledge in lieu of passing an exit exam. (*Massachusetts, Maryland, New Jersey, New Mexico, Nevada, Oklahoma, Oregon, Washington*)
- 7 states offer waivers or appeals of exit exam requirements, typically after students have made repeated attempts to pass an exit exam and have met other requirements related to attendance, remediation, and/or grade point average. (*Georgia, Idaho, Indiana, Minnesota (math only), New York, Ohio, Rhode Island*)

3. PSBA is concerned with the cost and process of implementing the mandated project-based assessment (PBA) applicable this school year to students in 9th grade or below who did not demonstrate proficiency through a Keystone Exam, or those students who were opted-out of taking Keystone Exams due to religious reasons.

The Chapter 4 proposal provides only minimal detail in explaining how this process would be implemented. However, information from the PA Department of Education (PDE) provided over the last several months gives much more detail on this highly prescriptive mandated process that school districts must follow. While the intended goals may have merit, this process will be extremely time-consuming and expensive to implement.

PSBA’s concerns with the PBA include:

- **Cost, time and staffing to provide remediation/supplemental instruction** to students who score at basic or below until the student can demonstrate proficiency via the Keystone Exam or the PBA. While PSBA does not oppose the issue of providing remediation, there will be a time factor and cost involved for districts.
- **Cost, time and staffing to implement the online PBA.** According to PDE, these online assessments could take up to 15 hours for a student to complete and must be done at school in the presence of a test administrator. Further, each student must have a tutor who is a teacher certified in the subject area that the student is testing in. The teacher is expected to act as a tutor to monitor the work, offer feedback and provide remediation to guide the student to success.

Will schools be expected to hire additional staff to accommodate this requirement, or will they be expected to take teachers out of their regular classrooms to do this? How will students who must complete up to 15 hours of project work be expected to make up the work they miss from their regular classrooms? If done before or after school, or during the summer, cost and time issues must be considered.

- **School districts will have to have an infrastructure to support students working on projects.** This includes district assessment coordinators, test administrators, and teacher tutors. Training will be required for staff in each of these roles, and a great amount of recordkeeping will be required to determine timelines for completion, provide notifications, schedule sessions and monitor students to ensure they have participated in the PBA and completed their goals. Again, in times of fiscal restraint, will districts have to hire additional staff? How will they pay for this?
- **Time necessary for each PBA to be evaluated by a statewide review panel.** Once a student completes a PBA, it must be reviewed by the district tutor and then submitted to a three-member evaluation panel assembled by PDE. In information provided by PDE this month, it has been estimated that it will take 4 to 6 weeks for the panel to evaluate a project. If the panel decides the project work is unsatisfactory, the student must re-do and re-submit the project. Time is wasted during that 4-6 week period while the student waits to know if the work completed will be enough. Meanwhile, will the district still be required to provide remediation to the student until the evaluation results are reported?

Flexibility is needed. PSBA suggests that the State Board allow school districts to have the option to develop their own project-based assessments using multiple measures or other systems in lieu of being required to use the state-developed project. The online testing system proposed by PDE does not allow for teachers to consider other measures of student performance and the needs of diverse learners in determining proficiency; rather, it places that decision in the hands of state-selected review panels. At the very least, local scoring should be permitted.

Schools should be able to establish their own processes in a reasonable and cost effective manner using the costs and staffing within their local resources that still meets the goal of ensuring that students can demonstrate proficiency in the core areas assessed by the Keystone Exams.

In closing, PSBA would like to emphasize our belief that public schools should provide meaningful academic instruction and assessment that engages its students to be critical and creative thinkers. The association supports efforts to appropriately measure student attainment of state and local academic standards using measures of accountability and performance that employ multiple, ongoing methods of assessment for knowledge, skills and abilities. The state needs to provide local school districts with maximum flexibility to make educationally sound decisions that expand opportunities for students, without an overreliance on standardized test scores, a narrowing of the curriculum, or prescriptive mandates.