



**Comments on
Amendments to Chapter 4
Relating to New State Tests and New Graduation Requirements**

**Presented by
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Thank you, Mr. Chairman, for holding this hearing and for providing PASA with an opportunity to talk with you this morning.

I am Stinson Stroup, Executive Director of the Pennsylvania Association of School Administrators. PASA represents school superintendents and other school leaders from across the Commonwealth. They have a vital interest in the quality of education programs and in the policy that governs the issuance of diplomas.

We are encouraged that the process of amending Chapter 4 continues and believe that the proposal is better as a result of the State Board of Education's many hearings, the regulatory review process, which included hearings before House and Senate Education Committees, and because of the delay resulting from last year's legislative action. While the revised proposal is an improvement over earlier drafts, it does not adequately address three key issues that PASA has raised throughout the regulatory process. Those issues are:

1. If we are going to have state end of course tests, we need clear guidance on the content to be tested and the related issue of what constitutes proficiency on that content. The proposal is still ambiguous about the relationship between the courses subject to examination and the state's academic standards. For example, while the proposal mandates the creation of tests that "assess academic content traditionally included in" various courses, including "high school literature and composition courses," it does not provide a definition of content traditionally included in these courses. Will the

test makers determine what content is to be tested, and therefore what will be included in the courses? If they don't, who will, and how will they do this?

The proposal also fails to define what level of proficiency will be required to pass each test and how the "cut scores" will be determined.

The quality and coverage of the courses for which tests are developed will depend on the quality and coverage of the tests associated with them. Will the new exams be geared to those students who are currently able to demonstrate proficiency on the PSSAs? Or will they be geared to those students who are struggling to achieve proficiency on the PSSA? If it is the former; the tests are redundant. If it is the latter; the tests may reduce the scope and quality of instruction for those students who are not challenged to demonstrate proficiency on the PSSA.

It is obvious that getting the right content is important. It is also important to get the proficiency "cut score" right. If the test aims too low, it will drive a weaker curriculum than the one currently available to many Pennsylvania students. If it aims too high, it may restrict rather than enhance the opportunities available to students by denying a diploma to some who would be successful in either college or work but would be denied access to both because of the lack of a diploma. (It is for this reason that we think an alternative pathway to a diploma is so important. I will discuss that in more detail at the end of my presentation.)

2. The need to provide alternative pathways for students to demonstrate proficiency in order to earn a high school diploma. Many states which have state graduation tests provide an alternative pathway to earn a diploma for students who don't perform well on the tests. If Pennsylvania adopts high-stakes exit exams, it also needs to offer an alternative means of earning a diploma. The alternative isn't only important for those students who are struggling with the tests. The alternative is important for all students because an alternative can promote a richer curriculum, higher levels of instruction and more rigorous standards of proficiency for all students, while recognizing that students not only learn differently but demonstrate what they have learned differently.

Alternative pathways are particularly important for students who may learn much of their math and science in practical applications: students who can clearly demonstrate the requisite skill for career success, but may not be able to demonstrate it on a pencil and paper test. Of specific concern are some students in career and technology programs. These include some students who have successfully completed a secondary school program, successfully passed a national test based on that curriculum, and/or earned a certificate based on industry standards.

Some states have addressed the need for an alternative to the one-test-doesn't-fit-all-students problem by providing alternative tests for alternative curriculum. Pennsylvania's regulation would do this for the Advanced Placement curriculum and the International Baccalaureate curriculum and the full range of curricula for students with disabilities. But it doesn't recognize the parallel validity of any vocational programs. We think it should.

Similarly, some states have an appeal process through which students can demonstrate proficiency through an individualized assessment when they meet specific prerequisites—like regular school attendance, successful course completion, or completion of special assignments and projects related to areas of recognized deficiency.

If Pennsylvania is going to more directly tie graduation to tests, PASA will urge development of a test alternative for some students.

3. The need to reduce the amount of time students will be required to spend preparing for and taking tests. The proposed tests likely will increase the amount of time students spend taking tests—not decrease it. Currently, students, parents, teachers and administrators complain about the amount of instructional time spend on testing and test preparation. We would like to decrease the amount of required testing, not increase it. Until the proposed new tests can be used for determining Adequate Yearly Progress under the federal No Child Left Behind Act, students will have to continue to take the eleventh grade PSSA tests. The proposal **adds** another set of tests. And, unless schools give up their own final exams in favor of the state's test, it means a **third** test, except in those districts that go through the proposed new validation process for their own tests.

PASA hopes to be able to work with you and with the State Board of Education to see that these issues are addressed before the regulations move forward.