

PSBA LEGISLATIVE ADVOCACY CONFERENCE

Graduation Requirements:

Local assessments & the GCAs

MAY 2008



Pennsylvania School Boards Association

Executive Summary

Like other states, Pennsylvania's system of how it educates and assesses students was changing in the 1990s. In 1993, the State Board of Education eliminated high school course and credit requirements in grades 9-12 and replaced them with 56 student learning outcomes. A new effort in 1997 to adopt performance-based academic standards with the stated purpose of connecting what is learned in school with the skills that are critical to success in life replaced the earlier outcomes proposal.

Along with how students were taught, Pennsylvania's assessment system also was undergoing changes. The Pennsylvania System of School Assessment, which debuted in 1991, originally was intended to measure the quality of a school's instruction. In 1999, after the state's academic standards were established, the PSSA was redesigned to measure both school and individual student achievement on the state academic standards. That same year brought changes to the state's graduation requirements. The major feature of those new requirements required students, beginning in 2002-03, to demonstrate proficiency in reading, writing and mathematics on the PSSA or local assessments aligned with state academic standards and state assessment at the proficient level or above to graduate.

At the time, there was some question as to how local graduation assessments were to be compared to the PSSA. The State Board believed that differences in success rates between the local graduation assessments and the PSSA would indicate that changes would have to be made to the assessment system.

The current Graduation Competency Assessment proposal represents a plan for such change. It would allow the commonwealth to develop 10 new GCA tests that could be used as graduation requirements in lieu of a proficient score on the PSSA. The proposal also allows the use of a validated local assessment and Advanced Placement and International Baccalaureate examinations as well.

PSBA believes that proponents of the proposal assert that change is needed because the current graduation assessments being used by school districts lack rigor and do not adequately measure a student's proficiency in the state's academic standards. PSBA strongly refutes this assertion, because there is nothing to prove its validity and because results from a PSBA survey on such assessments show that school districts are indeed following the intent of the current regulations in a variety of ways.

Additionally, PSBA believes that the GCA proposal infringes on areas that traditionally have been areas of local control, will be harmful to students and will result in significant costs to school districts and the commonwealth.

Introduction

Like most other states, Pennsylvania adopted academic standards and new assessment systems during the 1990s. This was a response to changes made under the reauthorization of the federal Elementary and Secondary Schools Act in 1994, under the collective title “Improving America’s Schools Act.” This law required states to implement statewide plans by developing and adopting challenging content standards and student performance standards.

In addition to calling for academic standards, the new law also required assessments in at least mathematics and reading or language arts that were to be used as the primary means of determining the yearly performance of each local educational agency and school. These assessments were to be the same used to measure the performance of all children, be aligned with the state’s academic standards and be used for purposes for which the assessments were valid and reliable. Assessments also were to provide for reasonable adaptations and accommodations for students with diverse learning needs where it was necessary to measure the achievement of such students relative to state content standards and include limited English proficient students in the language and form most likely to yield accurate and reliable information on student proficiency, to the extent practicable.

To some extent, Pennsylvania was ahead of the federal mandate. In 1993, the State Board of Education eliminated high school course and credit requirements in grades 9-12 and replaced them with 56 student learning outcomes, which described what students should know and be able to do upon graduating from high school. These outcomes – the precursor to our current academic standards – were met with strong opposition from various stakeholders. Beginning in 1997, a new effort to adopt performance-based academic standards, with the stated purpose of connecting what is learned in school with the skills that are critical to success in life, replaced the earlier outcomes proposal.

With all the changes to how and what students were being taught, it was only natural that the methods of assessing what was learned changed as well. The Pennsylvania System of School Assessment, which debuted in 1991, originally was intended to measure the quality of a school’s instruction. In 1999, after the state’s academic standards were established and approved, the PSSA was redesigned to measure both school and individual student achievement on the state academic standards. At the same time, the State Board also required school district high school graduation policies to address course completion and grades, completion of a culminating project and results of local assessments aligned with the academic standards. The new policy also required students, beginning in 2002-03, to demonstrate proficiency in reading, writing and mathematics on the PSSA or local assessments aligned with state academic standards and state assessment at the proficient level or above to graduate.

At the time, the *Pennsylvania Bulletin* contained the following excerpt, taken from the preface of the Proposed Rulemaking of the current proposal. This passage is particularly important to the discussions on Graduation Competency Assessments and local assessments in general.

Comparability of local assessment. Members of the House and Senate Committees and IIRC staff recommended that there be established a process for determining the comparability of local assessment. Language under §14.24(a) was changed so that local assessments must be aligned with academic standards and state assessments.

The most certain evidence of the comparability or degree of alignment between these assessments will come from repeated administrations of state assessments and

local assessments. If it becomes apparent that large numbers of students not achieving at the proficient level on state assessments are deemed proficient by local assessments, regulation and administrative review will become important. Until then, the board does not feel the extra administrative burden for schools and the department is warranted.¹ (*Emphasis added*)

In July of 2004, the State Board, sensing that there were large numbers of students graduating without scoring proficient on the PSSA, proposed revisions to its Chapter 4 (Academic Standards and Assessments) regulations. This proposal would have required school entities using a local assessment to determine graduation to submit an annual report to the Pennsylvania Department of Education certifying the alignment of the local assessment to the PSSA. The school also would have had to provide specific data to PDE to support the certification. PDE would have made an inference that the local assessment was not aligned with the PSSA or the PSSA proficiency levels if more students achieved proficiency on the local level than on the PSSA. The proposal also would have allowed PDE to withhold state funding from any school district that used a test that was not validated or where alignment was not certified by PDE.

Responding to this plan, PSBA joined organizations representing education professionals including vocational-technical school administrators in issuing a joint statement opposing the plan. Many of the arguments used then are similar to those being used in the current debate over Graduation Competency Assessments, namely, that the continued use of local tests would be costly because of additional steps mandated to require the alignment or validation of those tests and the impropriety of asserting that a score other than proficient on the PSSA renders a student as not having the proper skills and knowledge needed to graduate. Additionally, PSBA and the organizations involved asserted the importance for students to graduate with a knowledge and understanding of the state's academic standards and acknowledged the importance of PDE initiatives, which at the time included PAGE 1, Project 720 and dual enrollment, in assisting districts with making sure students were ready to graduate by the end of their senior year. Further, the organizations stated that they did not believe that achievement could be measured in only one way, through the PSSA, and that if students can consistently demonstrate an understanding of the state academic standards through a local assessment system, they should be permitted to graduate.

The Independent Regulatory Review Commission sided with PSBA and the other opposing organizations. In its comments on Jan. 4, 2006, the commission cites that the preamble to the section of the proposal relating to local assessment systems "considerably understates the change in requirements." It adds "[T]he proposed rulemaking does not contain sufficient information to fully evaluate its requirements and impact. The regulation imposes new requirements for school entities to monitor, analyze and report on the progress of their students. If these are not satisfactory, the secretary will take the devastating action of withholding state appropriations. We will evaluate the board's response to determine if the Regulatory Review Act criteria of economic and fiscal impact, feasibility and clarity have been met."² The State Board subsequently withdrew its proposal.

The proposal currently being debated can trace its roots to two major events, Pennsylvania's involvement with the American Diploma Project, a high school reform movement designed by

¹ 29 PA Bulletin 399 (January 16, 1999)

² Comments of the Independent Regulatory Review Commission on State Board of Education Regulations #6-295 (IRRC #2499); Academic Standards and Assessment, Jan. 4, 2006

Achieve Inc., and the report of Gov. Edward Rendell's Commission on College and Career Success.

Rendell, who is a member of the company's board of directors, is committed to implementing ADP's policy agenda in this state. Pennsylvania was among the original group of 13 states that made a commitment at the 2005 National Governor's Association summit to join with Achieve to form the ADP network. Since that time, the network has grown to include an additional 20 states for a total of 33 states. Achieve refers to itself as "a significant national voice for quality in standards-based education reform" and notes that it "provides policy leadership, technical assistance and other support to ADP network states."³

It should be noted that GCAs are only a part of the ADP agenda. According to a report called "Closing the Expectations Gap," which appears on the Web site of Achieve Inc., the company's agenda includes aligning high school standards with postsecondary expectations; requiring all students to complete the same curriculum in order to earn a diploma; requiring schools to administer college readiness tests to all high school students as part of their state assessment system; requiring states to have a P-20 data system that tracks the individual progress of students from prekindergarten through college graduation; and requiring states to develop accountability and reporting systems that promote college and career readiness.⁴

Following Pennsylvania's commitment to the American Diploma Project, Rendell created a Commission on College and Career Success. The commission's final report, in December 2006, calls for new state requirements for curriculum, assessment and other areas to meet workforce demands. Saying that globalization has arrived in Pennsylvania with significant implications for business and industry alike, the report contained 12 recommendations it believes are necessary for students to meet the challenges of a 21st-century economy and the requirements for productive citizenship. Among the recommendations are calls for the development of model curricula, individual student tracking from pre-K-16 and a new series of mandated, state-created high school exit exams.

The report notes that by the year 2010, two-thirds of all new jobs created will require at least some postsecondary education. For those entering the job force directly from high school, stronger math, reading and technical skills will be needed to succeed. The report also points to research it says shows that "high school graduates need to be educated to a comparable level of readiness whether they plan to enter college or workforce training programs. In essence, the commonwealth must prepare all students to go to college, whether they choose to attend or not, as they will need college-level skills and knowledge no matter what their choice."

The good news, according to the report, is that Pennsylvania has a strong foundation on which to build. That foundation includes its standards-based system of instruction and the use of the Pennsylvania System of School Assessment to measure achievement of the standards.

The report says the bad news is that "increased standards have not yielded consistent results at the high school level," with progress more clearly improved at the elementary and middle school level. According to the report, "Pennsylvania's educational pipeline is leaking with no low-skill jobs paying reasonable wages to catch those students who do not make it through."

In making the 12 recommendations, the commission emphasized that it does so because there are "tremendous inequities" in our educational system that will require "new strategic educational investments."

³ www.achieve.org

⁴ IBID, Achieve Inc. Web site

“It is the commission’s belief that the 12 recommendations provide a roadmap that will enable policymakers, high schools, postsecondary institutions, employers, parents and students to confront the challenge of redesigning the Pennsylvania high school experience head on and emerge with the high-quality workforce that our economy demands,” the panel wrote.

The recommendation that specifically addresses the GCA proposal states:

Require all Pennsylvania high school students to demonstrate proficiency on Pennsylvania’s academic standards to graduate. Students can demonstrate proficiency by scoring proficient or advanced on the 11th-grade PSSA or by passing a series of state-developed Graduation Competency Assessments.

The commission recommends that the state require all students to take a progressive series of Graduation Competency Assessments in math (including algebra II), English/language arts, laboratory science, and civics (American history, economics and government).

The report calls for removing the current option for school districts under state regulations (Title 22, Chapter 4) to use either the PSSA or a local assessment to determine student proficiency as a graduation requirement. According to the report, “the local determination of equivalency does not ensure a common, statewide graduation standard.” Instead, the commission recommends replacing the local assessment option with a series of Graduation Competency Assessments that all students would be required to take.

“While this recommendation provides two pathways for every student to reach graduation – proficiency on the 11th-grade PSSA or passage of the GCAs – the Graduation Competency Assessments must be used by every district with every student. ... Removing the local assessment option and rollout of initial GCAs should begin as soon as possible.”

Following these two occurrences, in March 2007, the state announced that it would be considering a plan to revise Chapter 4 to require all students to demonstrate proficiency on the 11th-grade PSSA or pass a series of Graduation Competency Assessments developed by the state in order to graduate. A few months later, in May 2007, the State Board released its own report titled “High School Graduation Requirements and the 21st-Century Economy” that supported the commission report. At the same time, the board issued its draft plan for Graduation Competency Assessments. With only a description of how the plan might be implemented, the board began to seek public input on the concept.

The board conducted four public roundtable sessions from July through September 2007 to gather input on the proposal from school directors, superintendents and principals, career and technical center administrators, teachers, special education advocates, parents and others. The plan was not well received as these groups voiced opposition to the proposed new series of high-stakes tests. However, it was clear that the board remained determined to move forward with the plan. In December, the State Board issued a revised version of its plan and conducted three additional roundtable sessions. On Jan. 2, 2008, the State Board released a formal proposal to amend its Chapter 4 regulations.

The proposal was the subject of a hearing one week later on Jan. 9 and was approved unanimously by the board on Jan. 17. In accordance with the provisions of the Regulatory Review Act, the proposal then was forwarded to the attorney general for review. The attorney general’s office approved the proposal and forwarded it to the General Assembly and the Independent Regulatory Review Commission on May 2, 2008. This is the proposal being debated currently. A copy of the proposal is found in Appendix A of this paper.

The GCA Proposal

The State Board of Education's proposal would amend Title 22, Chapter 4 (Academic Standards and Assessment). The proposal begins with a provision that the Pennsylvania Department of Education will provide support to school districts and area vocational-technical schools in developing educational programs that enable students to attain the state's academic standards. These supports include: 1) the establishment of a voluntary model curriculum aligned with the standards; 2) assistance in the development of effective student tutoring, remediation and extended instructional time programs; and 3) opportunities for continuing professional development designed to improve instruction in each of the content areas assessed by the GCAs.

Graduation Requirements

The most contentious provisions in the proposal are contained in the proposed amendments to §4.24 of Chapter 4, dealing with high school graduation requirements. This section begins by enumerating graduation requirements through the 2012-13 school year. As is the case under the current regulations, the 2012-13 requirements include course completion and grades, completion of a culminating project, results of local assessments aligned with the academic standards and a demonstration of proficiency in reading, writing and mathematics on either the state assessments administered in grades 11 or 12 or local assessment aligned with academic standards and state assessments at the proficient level or better to graduate.

Beginning in the 2013-14 school year, each school district and area vocational-technical school, including charter schools, must specify requirements for high school graduation in their strategic plans.⁵ In addition to the requirements stated previously, the 2013-14 plans must include a demonstration of proficiency, as assessed and determined by the school district or AVTS (including charter schools), in each of the state academic standards not assessed by a state assessment and a demonstration of proficiency or above in science and technology and environment and ecology (in addition to reading, writing and mathematics) as assessed through any combination of the following assessments:

- The PSSA administered in the 11th grade or the 12th-grade retest
- The English composition and literature Graduation Competency Assessment, any two mathematics GCAs and either science GCA
- Locally administered, validated criterion referenced assessments comparable to the GCAs
- Advanced Placement or International Baccalaureate exams that include academic content comparable to the appropriate GCA at a score established by the secretary to be comparable to the appropriate GCA
- Demonstration of proficiency or above in the state academic standards in civic and government or history in any one of the social studies GCAs, a validated local assessment or a comparable Advanced Placement or International Baccalaureate exam

It is the State Board's intention to have seven of the GCAs administered in 2010-11. All 10 GCA would be administered starting in 2012.

⁵ Each school district and area vocational-technical school must complete a strategic plan once every six years under §4.13 of Chapter 4. This strategic plan must include items such as a school entity's mission statement, its goals and planned courses of instruction, assessment system and other items.

Validation of local assessments

In order to continue using local assessments under the proposal, such assessments must be independently and objectively validated by a vendor selected by the school entity from a list of approved vendors published every five years by the secretary after obtaining the approval of the State Board of Education. In developing and selecting the list of approved vendors that may validate local assessments, the secretary would be required to employ a competitive request-for-qualifications process that includes consideration of: 1) organizational and staff experience in the validation of state and local assessments; 2) appropriate use of generally accepted psychometric statistical methods, practices and analysis; 3) references; and 4) cost. The secretary, with the concurrence of the State Board, could issue an additional request for qualifications prior to the end of the five-year period should the demand for validation services exceed the capacity of approved vendors.

School entities would be required to contract and pay the cost of validating each local assessment. Each local assessment would have to be validated by an approved vendor every five years. Except for the replacement of individual test items of comparable rigor, a new validation is required for any material changes to the assessment or revision of the assessed state academic standards.

Vendors would have to include the following criteria when determining whether the local assessment is comparable to the GCAs, as required:

- Assessments are internally consistent and reliable.
- Assessments adequately measure and are aligned with the academic content specified in the state academic standards assessed by the GCAs.
- Level of difficulty of assessment items is greater than or equal to those assessed on the GCAs.
- Proficiency-level cut scores are greater than or equal to that of the GCAs.
- Results of local assessments correlate positively and significantly with related national and state criterion-referenced assessments.
- Test administration, security and scoring regimes ensure that integrity and validity of the local assessment is maintained.
- Policy for annually updating assessment items ensures compliance with the previous criteria.

Supplemental Instruction

A student who does not score proficient or above on a PSSA administered in the 11th grade or GCA administered in any grade must be provided supplemental instructional support by the student's school entity. The supplemental instructional support must assist the student to attain proficiency in the state academic standards.

Special education students

Children with disabilities who satisfactorily complete a special education program developed by an Individualized Education Program team under the Individuals with Disabilities Education Act and state regulations would be granted and issued a regular high school diploma by the school district of residence. This rule applies if the special education program of a child with a disability does not otherwise meet all requirements of Chapter 4.

Demonstration of proficiency

Students are deemed proficient in the state academic standards whenever they demonstrate proficiency through any of the assessment options enumerated previously regardless of the student's grade level or age. Beginning in 2013-14, student transcripts must include scores in each GCA or validated local assessment, in addition to PSSA scores in each assessed discipline. As with PSSA scores, the release of individual GCA scores by any entity could not be made to the department or other commonwealth entities.

State assessment system

The department will develop or cause to be developed GCAs as follows:

- Three assessments aligned with the mathematics standards that assess the academic content traditionally included in algebra I, algebra II and geometry courses
- Two assessments aligned with select reading, writing, speaking and listening standards that assess academic content traditionally included in high school literature and composition courses
- Three assessments aligned with select history and civics and government standards that assess content traditionally included in high school level American history, world history, and civics and government courses
- Two assessments aligned with select standards for science and technology and environment and ecology that assess academic content traditionally included in high school level biology and chemistry courses

GCAs would have to be offered at least three times each year, in the fall, spring and summer. GCAs would have to be reviewed and scored so that the scores for candidates for graduation are provided to schools no later than 10 calendar days prior to graduation.

Each GCA may be designed into modules that reflect distinct, related academic content that is common to the traditional progression of coursework to allow students who do not score proficient or above to retake those portions of the test in which they did not score proficient or above.

The department will provide guidance to school entities as to the appropriate accommodations school entities must provide to students with disabilities and English language learners, when appropriate.

Issues with the GCA proposal

The debate over school assessments and their use has been ongoing in Pennsylvania since the PSSA test made its debut in 1991. Contention over the purpose of state tests, its administration, cost, uses and validity have all been voiced by education organizations, parents, students and other stakeholders within the public education community. Not surprisingly, the current proposal on Graduation Competency Assessments has drawn opposition not only from PSBA but also from organizations representing teachers, school district superintendents, school principals, parents, special education advocates and other stakeholders in the public education community. While the list of various issues that opponents of this proposal have is a long one, this paper will concentrate on four issues, the need for the proposal, the role of school entities in assessment and graduation, its likely effect on students and its cost.

Are Graduation Competency Assessments necessary?

In any debate over proposed legislation or regulation, the discussion surrounding the need for the changes that are called for is likely to be one that is fiercely argued on each side. Such is the case with the debate over this proposal.

Proponents for GCAs argue for the need for change with the following statements:

- In 2006, 57,000 students received a high school diploma in Pennsylvania without making a proficient score on the PSSA.⁶
- The existing system allows 501 school districts to have 501 different standards for graduation.⁷
- Students who graduate without scoring proficient on the PSSA are being cheated because they are given false belief that they are prepared when they are not.⁸
- Pennsylvania high school diplomas no longer have meaning to employers because of the many different standards for graduation employed by school districts.⁹
- Pennsylvania's community colleges and state universities spend almost \$28.7 million on classes to remediate college freshmen in reading, writing and mathematics.¹⁰

PSBA believes that the assertions made by proponents of the proposal are false. A failure to attain proficiency on the PSSA test does not guarantee that a student is not prepared for what follows high school, be it the workforce or higher education. The state's own PSSA validity study (HumRRO), which reviewed students at three Pennsylvania universities, shows that several thousand students in those universities who scored basic on the PSSAs in fact went on to college with no need for remedial classes. Among all three universities, 58.7% of students who scored basic or below on the PSSA tests took at least the standard level Math or English college

⁶ www.pde.state.pa.us, "Changing High School Graduation Requirements, New High School Requirements: Fact vs. Fiction"

⁷ IBID

⁸ IBID

⁹ IBID

¹⁰ Regulatory Analysis Form, State Board of Education proposed regulation of 22PA Code Chapter 4 – Academic Standards and Assessment (#006-312)

course. That is, most students who “failed” the PSSA enrolled in nonremedial college courses in the same subject area(s) in which they failed.¹¹

PSBA also questions the efficacy of adding a new standardized state test as an option for students to demonstrate proficiency on state standards if, as proponents state, students are not prepared to graduate by the spring of their senior year. Specifically, assuming that there are a number of students unprepared to graduate by that time in their high school career, how does an additional testing option help remedy the situation? It seems to PSBA that the problem of students being unprepared to graduate after four years of high school likely would be caused by gaps or inadequacies in the quality of instruction leading up to the senior year, not by the current system of state or local assessments. Offering GCA tests as the solution to helping students graduate who are not prepared to do so continues the very type of system that proponents are seeking to remove, that is, providing students with a false belief that they are prepared to graduate simply because they can pass a test, when they may not be prepared at all.

Proponents’ assertions also promote an unspoken belief that local assessments aligned with state academic standards and the PSSA, which currently are allowed and ARE being used extensively throughout the state, are inadequate. PSBA contends that proponents have no proof that such tests fail to measure student achievement accurately or that such tests allow those who are not proficient on the state academic standards to graduate.

PSBA Survey

In order to better illustrate the local assessment practices of school districts and other school entities, PSBA sent a survey to all school districts and area vocational-technical schools in January 2008 asking them to identify local assessment practices and their alignment to state standards and the PSSA.

This survey, a copy of which is found in Appendix B, was mailed to 522 school districts and area vocational-technical schools. PSBA received responses from 238 school entities, or about 46% of those receiving the survey.

The survey asked school entities about their current graduation requirements. The survey found that school entities were split on the question of whether or not a minimum score of proficiency on the PSSA test was required for graduation, with 46% answering that it was required and 54% answering that it was not required. Only 4% of districts (eight) that answered the follow-up question on how they deal with students who do not score proficient on the PSSA responded that they would withhold a diploma from a student who did not score proficient on the PSSA test. A total of 145 school entities, or 73% of those answering the follow-up question, responded that students scoring below proficient on the PSSA could use local assessments as an alternative means of demonstrating proficiency to earn their diploma. The remaining 23%, or 46 school entities, responded that only students with IEPs who score below proficient but achieve the goals and objectives of their IEPs are permitted to graduate.

A total of 84 respondents (35%) indicated that their school entity considers only the results of local assessments as a graduation requirement. A total of 157 respondents (66%) said that they do not consider only the results of local assessments as a graduation requirement.

¹¹ Andrea L. Sinclair and Arthur A. Thacker, (2005) “Relationships Among Pennsylvania System of School Assessment (PSSA) Scores, University Proficiency Exam Scores and College Course Grades in English and Math,” (HumRRO FR-05-55) Tables 16, 17, 18, 19, 20.)

A total of 416 responses were given when entities were asked to describe the nature of local assessments used as graduation requirements. The majority, 230 responses, or 55.29%, indicated that such tests are developed by individual teachers or by departments or grade-level teams. A total of 66 respondents, or 16%, responded that they used tests available through publishers of textbooks used by the school entity or other instructional resources. Thirty respondents, or 7%, indicated that they used nationally available standardized achievement tests, and 74 school entities (18%) indicated that they used other types of assessments. In this “other” category, the most common types of assessments used were “4-Sight” and Study Island, although many different assessment types were listed by respondents.

School entities that responded that their local tests were developed by individual teachers or departmental or grade-level teams were asked to respond a follow-up question on the development of their tests. While the responses to this question varied, the common attributes in most of the items submitted mentioned the use of specific appropriate state standards, assessment anchors, the NAEP and PSSA questions to develop assessments that are reflective of the school’s curriculum.

Entities responded that they ensured alignment with the state’s academic standards and PSSA in a variety of ways. These include indexing questions on the local assessment to a state standard and/or anchor, alignment with state standards through a format developed during strategic planning, aligning assessments with course and curriculum mapping, item mapping, aligning local assessments with the PSSA based on the percentage of questions on the PSSA in each academic area, reviewing curriculum in each academic subject and through the work of employees receiving professional development in curriculum and assessment alignment.

Assessment strategies used as part of the local assessment system include locally developed tests (24%), course grades (20%), locally developed project or other performance assessments (19%) and student portfolios (14%). A discussion on the use of assessment strategies is included later in this paper.

On average, respondents reported a cost of \$154/student to develop, administer and score local assessments. Respondents indicated that on average, they spend \$53/student on costs related to the implementation of local assessments.

Respondents that said they use nationally available standardized tests indicated that they purchase tests from Success for All, Harcourt and CTB-McGraw-Hill most often. The most common tests fitting this description are 4-Sight and Terra Nova. A total of 81% of those using national tests indicated that the test developer ensured that the assessment purchased is aligned with Pennsylvania’s academic standards. Others (10%) indicated that while there was no reference to the state’s academic standards, the assessment was based on local curriculum, which is aligned to the state’s standards. Respondents reported an average cost to purchase these tests of \$57/student, with an additional average cost of \$26/student to implement those assessments.

On the issue of remediation, 192 respondents (81%) indicated that they require remediation for students who score basic or below basic on the PSSA or local assessment. As indicated, remediation efforts include Study Island courses, tutoring, use of PLATO learning software, use of an individualized data-based grade-level learning plan system that includes remediation through other school programs, summer school, additional coursework and software programs, afterschool and Saturday sessions, remediation built into student schedules, math-plus-a-half/reading-plus-a-half programs, Web-based tutorial remedial-based programs and small group instruction. Respondents also indicated that study halls and other available time are used for remediation efforts.

On the issue of costs, respondents were asked to rank 10 different areas in the order in which they anticipated new costs arising from the GCA proposal. The top five results are:

- Remediation, other than summer programs, in each of the 10 areas covered by the GCAs (1,411 total responses)
- Expanded summer programs for remediation (1,058 total responses)
- Staff/scheduling/remediation for students with disabilities who would not be exempted by their IEP to take these 10 tests (1,033 total responses)
- GCA test administration three times a year (1,003 total responses)
- Staff time for professional development (971 total responses)

Descriptions of school entities' local graduation assessments

While it is difficult to ascertain from the responses given to PSBA's survey whether a school district has a local graduation assessment that is aligned as the regulations require, additional insight can be gained by examining the additional comments provided by respondents.

Austin Area SD – Assessments are developed based on released PSSA questions. Alignment is guaranteed because questions are taken from previous PSSA samples. Students not scoring proficient are required to attend afterschool remediation classes, take the PSSA 12th-grade retake and attend additional remediation classes if necessary.

Avon Grove SD – The district has developed and utilized a “Graduation Matrix” as a part of the process for validating that students graduating from high school have demonstrated proficiency in reading and mathematics. Students not meeting proficiency on the PSSA reading and/or mathematics assessment in the spring of 11th grade are counseled and monitored closely using the matrix. Students must earn points on the matrix, which outlines alternative methods for demonstrating proficiency. Methods for demonstrating proficiency include taking and passing the 12th-grade PSSA retake, taking another full year of mathematics and participation and completion of 11th-grade Study Island with a 75% or higher grade.

Camp Hill SD – The curriculum is developed to address PA academic standards and beyond. Course assessments are developed to provide evidence of students' achievement of PA and Camp Hill SD standards. Tests are developed by teachers in collaboration with department teams. Tests are aligned through a six-year review process. Alignment with state academic standards, the basis of PSSA, is addressed as a step within this curriculum review process.

Central Bucks SD – The district uses a portfolio system that includes various problem-solving tasks in each of the courses to assess students' knowledge of the standards. The core assignments and student grades on major tests go into a portfolio. The tests are aligned to the courses, and courses are aligned to the state standards. Parents may opt out of the remediation program. The program is designed for students in all secondary schools and is a review of basic skills as measured on the PSSA.

Central Columbia SD – The district has undergone a multiyear writing, validating and editing process. Curriculum-based assessments are based on planned courses aligned to PA academic standards on anchors. District has developed an individualized data-based grade-level learning

plan system that includes remediation through other school programs, summer school, additional coursework and software programs.

Colonial SD – Consultants (psychometricians) provide guidance and support to teachers developing assessments. The district uses PSSA standards/assessments anchors as a guide and starting point. If necessary, the district adds “Power Standard” Essential Understanding to enhance test development. Benchmark assessments are built and reviewed, using pilot testing. Each local assessment question is aligned to both state standards and assessment anchors using PSSA/PDE tools.

Downingtown Area SD – Tests are developed through collaboration among course instructors. Item analysis is used to determine questions. The questions are aligned to the curriculum, which is aligned to PA Academic Standards. District used Webb’s Depth of Knowledge to write questions and align instruction.

Fort LeBoeuf SD – Teachers in each department collaborated to create a local assessment that reflected the PSSA anchors in mathematics, science, social studies and English. The local assessment was developed by auditing the curriculum and calibrating each of the eligible content within each anchor.

Hempfield Area SD – Local assessments are developed as each academic area undergoes an intensive curriculum review and revision. Developing district assessments around critical learning targets is a key part of the process. The curriculum review process is undertaken at the same time. The district has a very strong curriculum development process that includes district assessments of essential learning targets identified for students. It collects data on the performance of students on local tests and compare to PSSA results and uses data for ongoing curriculum revision and development of instructional strategies.

Marple Newtown SD – Grade-level or department-level teams work in cooperation with curriculum coordinators and building and district administrators to develop tests and ensure alignment with state standards. Each course is reviewed and curriculum aligned with state standards by teams or teachers and content specialists.

Mechanicsburg Area SD – Departments have identified the “know, understand and do” for each standard. This information is translated into essential questions for units. District uses collaboration between teachers to backwards map the question into course assessments.

Newport SD – Tests are developed by individual teachers in concert with departments using the assessment anchors, state standards and curriculum. District has a Project 720 high school. Because assessment anchors, state standards and PSSA materials are used in developing tests, the district believes local tests are properly aligned.

North Allegheny SD – As departments undergo curriculum updating, a test bank of standards-based assessment items is developed. These items assess mastery of the PA standards aligned to each course on a quarterly basis. As a first step, all curricular departments complete a K-12 alignment form of the PA standards. As a result, each grade level and course is assigned to the

specific PA standards. For each course, the assessment items are designed specifically to the PA standards and are aligned to the respective courses through a K-12 alignment process.

Northampton Area SD – Departmental teams develop assessments that are aligned to PA standards, anchors and local curricula. Individual assessment questions are indexed to a standard or anchor in most cases.

City of Philadelphia SD – Schools use teacher- or department-made mid-term/final exams based on the core curriculum, which was validated as aligned to state standards by a Phi Delta Kappan audit. The core curriculum and benchwork (interim assessments) are aligned to the State Standards. Principals, department heads and academy leaders are responsible for monitoring the quality of the mid-term and final exams.

Punxsutawney Area SD – For local assessments, the English department uses a combination of locally developed tests and tests obtained from both publishers of textbooks used in classes and other instructional resources. Writing prompts evaluate focus, content, organization, style and conventions following PA academic standards. Alternative reading tests are constructed using a blend of evaluative, analytical, recall, interpretative and relative questions based on fiction and nonfiction selections. These are designed to measure critical reading in all content areas. Questions also cover literary elements and devices. Math department reviews PSSA as a model and determines the percentage of questions that cover the individual PA state standards. This is then replicated so that local assessments parallel state assessments insofar as the percentage of questions covering specific items.

Schuylkill Valley SD – Tests are developed by math department chair, who was a member of the state committee that developed the PSSA. This assessment measures student competency in algebra and geometry. For reading and writing, the district consulted with a member of the elementary staff, who served on the reading state-level committee. With her insight, members of the English staff devised a reading and writing assessment similar to the PSSA.

Upper Dauphin Area SD – Benchmark tests are used that were developed by the high school math teachers working with the IU. Three tests were developed by teachers and one test by the IU. When the tests were developed, the district used the standards as the basis for the tests. The district tried to keep the percentages close to the PSSA: geometry – 25%, algebra – 30%, data – 10%, measurement – 15%, computation and operations – 20%.

Survey conclusions

The data from the PSBA survey make it clear that, where graduation assessments are concerned, it is not a matter of using the PSSA as a graduation requirement or not. Rather districts appear to use a continuum, part of which is the 11th-grade PSSA, followed by remediation for those students not scoring proficient and then participation in the 12th-grade PSSA retest or passage of a local assessment.

PSBA conducted this survey to show that school entities throughout the state spend considerable time, effort and resources on the development and alignment of local graduation assessments. The association believes strongly that these efforts should not be summarily

discounted by proponents of the GCA proposal as being ineffective or less rigorous than state assessments.

The undeniable facts are that districts use a variety of tests and means of aligning those tests with state academic standards. PSBA does not assert that the survey results prove that all school districts are following the current high school graduation regulations, but we believe it demonstrates that there are many school districts where the local assessment is developed and aligned as required under the current regulations.

Graduation, curriculum and local control

Setting graduation requirements and curriculum historically has been the province of local school districts. The Public School Code, in sections 1611 and 1613, asserts that school districts have the authority to confer degrees and certificates to students who complete mandatory courses of study. The very same Chapter 4 that is being proposed for amendment affirms local control over design and planning of curriculum. Portions of Section 4.4. (General policies) of Chapter 4 read as follows:

(a) **It is the policy of the board that the local curriculum be designed by school entities to achieve the academic standards** under §4.12 (relating to academic standards) and additional academic standards designated in strategic plans under §4.13 (relating to strategic plans).

(b) **It is the policy of the board that local school entities have the greatest possible flexibility in curriculum planning** consistent with providing quality education and in compliance with the School Code, including requirements for courses to be taught (24 P.S. §§15-1501 and 16-1605); subjects to be taught in the English language (24 P.S. §15-1511); **courses adapted to the age, development and needs of the pupils** (24 P.S. §15-1512); minimum school year of 180 days and minimum of 900 hours of instruction at the elementary level and 990 hours of instruction at the secondary level (24 P.S. §§15-1501 and 15-1504); employment of sufficient numbers of qualified professional employees (24 P.S. §11-1106) and superintendents to enforce the curriculum requirements of state law (24 P.S. §10-1005); and this part. (*Emphasis added*)

PSBA also believes that the GCA proposal would severely limit the number of methods by which students could demonstrate proficiency for graduation. While the proposal purports to continue to allow a local assessment as a permissible demonstration of proficiency, such assessments would have to be validated using the criteria contained in the proposal. These include the criterion mentioned previously on page 7. A spokesperson for CTB/McGraw Hill, a leading testing company had the following to say regarding the validation requirements contained in the proposal:

“To do the [validation] study correctly for 10 GCAs with a small sample size and to conduct on-site training for content validity and alignment for 10 tests would probably be cost prohibitive for any one regular-sized school district.”¹²

It is clear in the proposal that school districts have to develop multiple local assessments to use as graduation requirements. The proposal in §4.24(b)(iv)(C), the language that describes the graduation requirements beginning in 2013-14, mentions “locally administered, validated criterion-referenced **assessments** comparable to the GCAs.” (*Emphasis added*)

¹² E-mail message from Dan Sidelnick, CTB/McGraw-Hill, to Dr. Mary Ravita, South Fayette SD, March 11, 2008.

Likewise, §4,24(b)(v)(2) references validation of local **assessments**. Along with the costs of validation, the mere development of multiple local assessments likely would put severe financial and administrative burdens on all but the wealthiest and largest school districts. Because of these costs associated with continuing to use a local assessment for graduation purposes under the proposal, PSBA asserts this option, for all intents and purposes, has been removed as a viable alternative and cannot be counted as a realistic option for school entities.

Not only would the prospect of using local assessments be expensive, any district going through the extensive validation process would find that it would result in local assessments closely resembling the GCAs. Because the validation criteria include provisions that would require alignment with academic content specified in the state academic standards assessed by the GCAs, level of difficulty of assessment items greater than or equal to that of the GCAs and proficiency-level cut scores greater than or equal to that of the GCAs, the resulting local assessment would greatly resemble a graduation competency assessment.

The proposal also allows the use of certain Advanced Placement and International Baccalaureate exams as alternatives to the PSSA and GCA for demonstration of student proficiency. However, the College Board reports that only 18% of Pennsylvania graduates in 2007 took at least one AP examination in their four years of high school.¹³ Anecdotal evidence from school administrators indicates that International Baccalaureate programs are even scarcer. Consequently, for most Pennsylvania seniors, the only acceptable methods of proving proficiency under the proposal will be through the PSSA or the GCAs. There will be no practical local measurement of proficiency permitted.

Effect of GCA proposal on students

While the GCA proposal would provide another option for students to demonstrate proficiency in the state academic standards in order to graduate, it would remove the local option, for all practical purposes, and provide two other options, the Advanced Placement and International Baccalaureate tests, that are not available to most students.

More importantly, the proposal would eliminate the use of various assessment strategies that currently are required for use in local assessments by school entities. The current regulations provide that the local assessment system, of which the graduation assessment is a part, must be designed to include a variety of assessment strategies, such as:

- Written work by students
- Scientific experiments conducted by students
- Works of art or musical, theatrical or dance performances by students
- Other demonstrations, performances, products or projects by students related to specific academic standards
- Examinations developed by teachers to assess specific academic standards
- Nationally available achievement tests
- Diagnostic assessments
- Evaluations of portfolios of student work related to achievement of academic standards
- Other measures as appropriate, which may include standardized tests¹⁴

¹³ The” Fourth AP Annual Report to the Nation: Pennsylvania Supplement”

¹⁴ §4.52(e)(1-9) of Chapter 4 (Local assessment system)

On the other hand, the proposal requires local assessments to be “validated criterion-referenced assessments comparable to the GCAs.”¹⁵ There are no changes to §4.51 (State assessment system) that would allow for the use of different assessment strategies. Consequently, students that are not good test takers will have more difficulty in demonstrating proficiency in order to graduate.

Proponents of the proposal argue, however, that because students can continue to take the GCAs until they pass them, the pressure will be removed from students who do not do well on standardized tests. PSBA counters that the pressure on students will not be removed but will increase. In addition to facing the prospect of not being able to graduate, students will face the prospect of staying in remediation classes, perhaps missing or being unable to schedule desired or required classes while remediation takes place.

Some researchers even question the validity of remediation efforts at the high school level.

A final problem is that providing remedial help in grades 10, 11 and 12 is surely the proverbial “too little, too late.” A student’s performance in one grade powerfully influences performance in subsequent years, so it takes several years of *sustained* efforts to move a student’s performance from a low level to one sufficient to pass an exit exam. This means that efforts to improve exam performance should start at least in middle school, and perhaps even in elementary school, to ensure that all students acquire basic skills in literacy and numeracy. Overall, states are caught in an inescapable dilemma. If they set exit exam standards high, incorporating 11th- and 12th-grade material, then pass rates will be low and states will have to confront the expensive and difficult challenge of helping all students meet high standards, throughout the middle and even elementary school years. If they set standards low, then most students will pass, and states can hope that short remedial programs at the last minute will pull most of the remaining students through. But this tactic defeats the purpose of exit exams, since it neither maintains high standards nor provides low-performing students with powerful education experiences. Under these conditions, exit exams become symbolic rather than strategic.¹⁶

Proposal costs

Almost as critical as the question “Is this proposal necessary?” is the question “How much will it cost?” As with the first question, there typically are sharp differences between proponents and opponents of proposals on the second question as well. The Regulatory Analysis Form accompanying the proposal declares that “districts will incur savings of approximately \$8 million annually resulting from the adoption and use of the voluntary model state curriculum.” These savings result from “reduced staff time, consultant fees, materials, research and development costs, etc.” In addition, the board estimates that districts will save in excess of \$220,000 annually in staff time, copy costs for the development and administration of individual teacher, school or district-wide final course exams.”¹⁷

Of course, in order to make these statements regarding potential savings, an assumption has to be made that a certain number of districts will have to use the voluntary model curriculum and the GCAs to replace current examinations. The board estimates that 250 school districts initially will use the model state curriculum. No estimate is given on how many districts would replace

¹⁵ Proposed §4.24(b)(iv)(C)

¹⁶ “‘Restoring Value’ to the High School Diploma: The Rhetoric and Practice of Higher Standards”; W. Norton Grubb Ph.D., University of California, Berkeley; Jeannie Oakes Ph.D., University of California, Los Angeles, October 2007, Education and the Public Interest Center

¹⁷ IBID, Regulatory Analysis Form

their current examinations and use the GCAs as graduation requirements. It would be interesting to see how the State Board made the estimate on the use of the voluntary model curriculum. Even if its estimate is accurate, would school districts simply be able to dismiss curriculum development staff, or would they retain such staff and use them in a different capacity?

The Regulatory Analysis Form states that “local government will face no additional costs associated with compliance.” PSBA believes that this statement is overly optimistic.

Districts will see an increase in remediation costs. The current regulations, under the requirements for local assessment systems, require school entities to provide “assistance to students not attaining academic standards at the proficient level or better.”¹⁸ The proposal adds to that requirement by mandating that school entities provide “supplemental instruction to a student who does not score proficient or above on a PSSA administered in 11th grade or GCA administered in any grade.”¹⁹ Because the proposal requires students to be proficient in all state standards that are not assessed by a state assessment and it allows proficiency on these standards to be assessed, presumably, through a local assessment, school entities potentially face additional costs for remediation for students not scoring proficient on these newly required assessments. The new requirement for proficiency in science on the PSSA and proficiency on at least one social studies GCA will add to remediation costs as well. More assessments to test proficiency on standards not assessed on a state assessment also will add costs.

Districts will have to develop extensive recordkeeping systems to match students with the GCAs 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 also will experience increases in costs for professional development on the implementation and administration of GCAs. Interestingly, the State Board correctly identifies remediation and tutoring as one of the allowable uses of Accountability Block Grant funds (professional development is another allowable use of funds but is not cited); however, information from the Department of Education shows that tutoring and professional development are two of the lesser utilized uses of the ABG monies, giving way to such things as full-day kindergarten, prekindergarten and smaller class sizes.²⁰ In fact, changes to the ABG program in 2007 provided incentives to school districts to use their ABG grants for early childhood programs.

Any redirection of these funds for tutoring and/or professional development would cause the school district to have to find alternative funding for programs it already supports with these dollars. Also, the amount of funding for Accountability Block Grants and the separate line item for tutoring and extra instructional time, while increased over a several-year period, have been proposed for even funding in the 2008-09 state budget.

Indeed, no one can tell how these line items will change by the time the proposal takes effect in 2013-14. Rendell’s proposed funding increase of \$2.6 billion over the next six years will be helpful but it must first win approval from the General Assembly.

The proposed budget calls for \$15 million to develop the first three of the required 10 GCAs, although the algebra II assessment has been developed through an interstate partnership. These costs, plus costs to validate the tests and costs for additional remediation and professional development, are estimated to cost the state almost \$160 million over the next five years.²¹

¹⁸ 22PA Code § 4.52 (a)(1) (Local assessment system)

¹⁹ Proposed §4.24(c)

²⁰ PA Dept. of Education, Achieving Student Success, Accountability Block Grant 2006-07 year-end report

²¹ IBID Regulatory Analysis Form

Conclusion

Both the proponents and opponents of the current GCA proposal are united in their desire for a system that ensures that students graduate from high school proficient in Pennsylvania's academic standards. Proponents believe that the only way to ensure this is through state tests – either the PSSA or the GCAs. Opponents, including PSBA, believe that a system that allows local tests aligned to the state academic standards and the PSSA can meet this requirement. PSBA is not convinced that the discrepancies shown by the proponents that more students are graduating without scoring proficient on the PSSA point to a deficiency in local assessments.

The association believes that the data from its survey of school entity assessment practices shows that districts expend considerable time, effort and resources, both personnel and financial, in developing local graduation assessments. Even within the limited information that could be shared through the survey, it appears to us that school entities are making a sincere effort to develop and align test to the best of their ability.

The conferring of high school diplomas and development of curriculum are issues that have a long history of local control, as stated in the current School Code and State Board regulations. Simply wiping away such local control in favor of statewide testing and curriculum development could have lasting effects on Pennsylvania's high school students. Time and again, it has been shown that a "one-size-fits-all" approach does not work in education.

The proposal also will be harmful to students, especially those who do not fare well on standardized tests and on those who attend school entities that do not have the capacity to provide the quality of instruction available in the state's wealthiest school districts.

Rather than spend the estimated \$160 million over five years to implement the GCA proposal, PSBA believes those dollars would be better spent on efforts that capture the best practices in local assessment and sharing and implementing them in all districts statewide. The final result would be graduation requirements that are based on a mixture of state and local assessments that accurately measure a student's proficiency in the commonwealth's academic standards. Additionally, such a system would allow the continued use of various assessment strategies through the local assessment, ensuring that all students would have a variety of alternative methods in which they could demonstrate proficiency.

Finally, some of the funds earmarked for the implementation of this proposal could go to school districts that cannot provide adequate assessments because of lack of financial resources. Funds could be used to help districts hire necessary staff or contract with test providers or intermediate units, as some already do, to help create and implement rigorous local assessments and to provide districts with technical assistance.