

#2499



Pennsylvania School Boards Association

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INDEPENDENT REGULATORY
REVIEW COMMISSION

January 8, 2008

Mr. Kim Kaufman, Executive Director
Independent Regulatory Review Commission
333 Market St., 14th Floor
Harrisburg, PA 17101

Dear Mr. Kaufman:

The Pennsylvania School Boards Association would like to express its support for the State Board of Education's proposed revision to regulations under Title 22, Chapter 4, before you this week as No. 2499, State Board of Education #6-295. We urge the Independent Regulatory Review Commission to approve this proposal.

The Chapter 4 proposal contains changes that serve to update the existing regulations with current practices and compliance with the state assessment system as required by the federal No Child Left Behind Act. The proposal also updates provisions related to the development and implementation of the state academic standards within school districts.

In addition, the proposal clarifies state requirements for the study of world languages by maintaining the mandate for school districts to provide instruction in at least two languages in addition to English. It also adds new language requiring world language programs to be "planned" instructional programs that enable students to meet World Language Standards issued by the Department of Education, and describes the general purpose and content that must be contained within these standards. Without this change proposed by the State Board of Education, the study of world languages would become a new mandate for all students, including those in elementary and middle school grades, as well as at the high school level. Most importantly, without this revision, all students would have to demonstrate proficiency in another language in order to graduate.

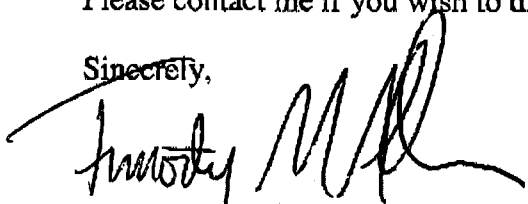
PSBA strongly supports the efforts of the State Board of Education to emphasize the importance of the study of a world language without adding such study as a new graduation requirement. During numerous thoughtful discussions, the board acknowledged that it did not want to create an unfunded state mandate for school districts. While PSBA agrees that the ability to speak other languages may be valuable for certain students, the association does not believe that every student should be forced to demonstrate proficiency in another language instruction in order to graduate. Generally, most high school students following a college prep track student will choose to take a language course, while many others, including those focusing on career and technical education courses, or IEP students, may not have a desire or need to study a world language as a condition for their post high school plans.

PSBA also is concerned that a world language graduation requirement would create financial and personnel complications. By using high school student data from the 2004-05 school year supplied by PDE, the State Board has estimated that it would cost an additional \$114.5 million to hire additional teachers for the additional 295,900 students that currently do not take a world language course. That amount does not include costs that would be incurred for necessary textbooks, materials and supplies and classroom space.

Requiring world language proficiency would increase demand without adequate supply of qualified teachers. In 2004-05, there were 3,644 world language teachers employed throughout the Commonwealth. According to the State Board, an additional 2,683 teachers would be needed to fulfill this mandate. Equally hindering, world language teachers must meet relatively higher standards of evaluation, thereby making it difficult for district to find enough qualified teachers. As an example of this stringency, in 2004-05, PDE awarded only 324 new world language certificates. School districts would experience many difficulties in providing appropriate staff and funds to meet such a new mandate for world language programs.

We appreciate the opportunity to offer PSBA's support for the proposed amendments to Chapter 4. Please contact me if you wish to discuss any of the issues addressed in this letter.

Sincerely,



Timothy M. Allwein
Assistant Executive Director
Governmental and Member Relations

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DATE: January 7, 2008

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TO: Jim Smith

TOTAL # OF PAGES (INCLUDING COVER): 3

FROM: Cindy Eckerd

Legislative Information Director

Mr. Smith

Here is the PSBA's letter in support of proposed regulation of the State Board of Education, #6-295.

Please call me at 506-2450, ext. 3319 if you have any questions.

Thanks,

Cindy Eckerd