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**Pennsylvania
Partnerships for Children**

Joan L. Benso, President and CEO

Michael J. Breslin, Chair of the Board

20 North Market Square, Suite 300, Harrisburg, PA 17101-1632

October 20, 2006

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

Dear Ms. Kaufman:

I am writing to urge your approval of the State Board of Education's proposed final form prekindergarten regulations (Chapters 4, 11, and 12) that are now before you for your consideration.

We should all be proud that Pennsylvania no longer holds the distinction of being one of only nine states in the nation not investing in pre-K programs. But as school districts invest more of their Education Accountability Block Grant funds in pre-K programs, the need to have a sound regulatory framework for those programs increases. When the State Board appointed an early childhood committee two years ago, we urged that committee to base its regulations on the solid base of research about high-quality programs. The most essential characteristics of effective programs are well-trained personnel and reasonable class sizes. The proposed regulations now before you (and the State Board's proposed revisions of Chapter 49) address both of those issues appropriately. The proposed changes in Chapters 4, 11, and 12 also provide for PDE guidance to school districts about developmentally appropriate curriculum and instructional practices, community-based planning and collaboration with other providers of services to young children, non-instructional services for pre-K children, and the amount and duration of instruction. Since the impact of this regulatory package may vary from district to district, the regulations allow the Secretary some discretion in granting waivers to assure quality programming. The proposed rules make clear that districts do not have to offer pre-K programs (but must follow the regulations if they do) and that parents do not have to enroll their children.

We have worked closely with the State Board and its early childhood committee over the past two years and can assure you that the Board and the Department staff have been very open to suggestions from all interested groups. The result is an excellent regulatory package deserving of your support. Thank you for your consideration of our views.

Sincerely,

Joan L. Benso
President and CEO

cc: Jim Buckheit, State Board of Education

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