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Pennsylvania Association of School Administrators

2579 Interstate Drive ~ Harrisburg, PA 17110-9602
(717) 540-4448 (717) 540-4405 fax www.pasa-net.org

Secretary's Office

INDEPENDENT REGULATORY
REVIEW COMMISSION

July 24, 2006

Mr. Shawn Farr
Special Asst. to the Secretary of Education
Pennsylvania Department of Education
333 N. Market St., 10th Floor
Harrisburg, PA 17126-0333

Dear Mr. Farr:

I am writing on behalf of the Pennsylvania Association of School Administrators to comment on the Keystone Education Accountability standards as proposed. (22 PA Code Ch. 405; PA Bulletin, VOL. 36, NO. 26, July 1, 2006 at 3253).

Below I offer a few suggestions to clarify the use of the proposed indicators.

In addition, school administrators believe the cost and paperwork estimates substantially understate the cost to both school districts and the Commonwealth of compliance with the standards as proposed. Further, administrators would appreciate some clarification on the implementation schedule, addressed in the preamble but not in the body of the standards.

Suggested Amendments

Section 405.1 (relating to purpose) is clear that the indicators are guides to assist in determining whether a standard has been met, and do not each have to be satisfied. We support this general rule and believe that it would be clearer if, in addition to the statement in this section, each of the sections on the standards recognized the indicators as guidance and not as substantive requirements. We suggest, therefore, that 405.2 (1) (relating to management structures standards) be amended by adding "may" so that it reads:

The roles and responsibilities of the board and superintendent have been clearly delineated, and policies and procedures are in place to ensure that the board and the superintendent can effectively and efficiently work together. Indicators of compliance may include, but are not limited to, the following:

We would suggest that "may" also be added in similar fashion to each of the standards. (405.2 (2), (3), (4), and (5); 405.3 (1) and (2); 405.4 (1), (2), (3), (4), (5), (6), (7), (8), (9) and (10); 405.5 (1), (2), (3), (4), (5), and (6); 405.6 (1), (2), (3), (4), (5), and (6); 405.7 (1), (2), (3), (4), (5), (6) and (7); 405.8 (1), (2), (3), (4) and (5). 405.9 (1), (2), (3), and (4); 405.10 (1), (2), (3), and (4); 405.11 (1) and (2); 405.12 (1), (2), (3), (4), and (5).

Cost and Paperwork Estimates

The Keystone Education Accountability Act requires school districts to conduct a self-assessment against the standards adopted by the department. The department's note does not recognize any costs associated with this review. It only identifies potential costs that a district may incur to achieve compliance with a standard not being met. Given the breadth of the standards and the indicators, we believe the cost of the self-assessment could be substantial. Clearly, to conduct the self assessment against these standards, a number of district staff from every operational area will have to document compliance and submit that documentation to the department. This will involve a substantial amount of staff time and expense.

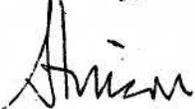
Greater costs fall on the Commonwealth. The department is obligated to review the self-assessments and conduct at least one public hearing in each school district. Further, the department is to use "the existing School Evaluation Services reports" in conducting its review. The last year for which the School Evaluation Service reports were available was 2004, so that it is not clear what costs will be incurred by the department to develop the school district data reporting system necessary to benchmark district performance as part of the review.

In addition, Commonwealth costs will be incurred in filing its reports and in providing technical advisors to school districts that are found not to meet the best financial management practices standards as published.

Implementation Schedule

The published description of Cost and Paperwork Estimates indicates that "approximately 25 districts will be reviewed in 2006-07, the first year of the program, and approximately 95 districts will be reviewed each year for the next fiscal years, starting in 2007-08." It is not clear that this corresponds with the Strategic Planning Cycle for school districts, to which the reviews are tagged in the act. (24 PS section 2506-A). We would appreciate clarification of this schedule.

Sincerely,



Stinson W. Stroup
Executive Director