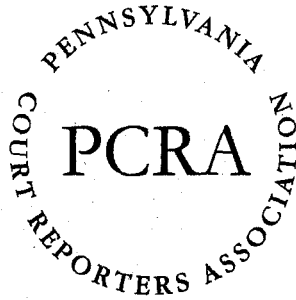


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PA. STATE BOARD  
OF EDUCATION

July 18, 2007

MR. JAMES BUCKHEIT  
EXECUTIVE DIRECTOR  
STATE BOARD OF EDUCATION  
333 MARKET ST  
HARRISBURG, PA 17126-0333  
[jbuckheit@state.pa.us](mailto:jbuckheit@state.pa.us)

re: **State Board of Education Amendments to 22 Pa. Code Chapter 14  
Qualifications for CART providers**

Dear Mr. Buckheit:

I am writing to request that you correct a serious omission from the State Board of Education's proposed amendments to 22 Pa. Code Chapter 14. Specifically, the proposed amendments do not address qualifications for CART (Communication Access Realtime Translation) providers who deliver services to deaf or hearing-impaired students and/or other students for whom CART is deemed an appropriate accommodation under an IEP.

Section 300.156 of IDEA states:

**"§ 300.156 Personnel qualifications.**

**"(a) General.** The SEA **must establish and maintain qualifications** (*emphasis added*) to ensure that personnel necessary to carry out the purposes of this part are appropriately and adequately prepared and trained, including that those personnel have the content knowledge and skills to serve children with disabilities."

On behalf of the Pennsylvania Court Reporters Association, the only professional association within Pennsylvania which represents CART providers, I respectfully request that you include the following qualifications requirement for CART providers in the Chapter 14 amendments: **"Communication Access Realtime Translation (also known as Computer Assisted Realtime Transcription) will be provided by an individual who holds one of the following National Court Reporters Association (NCRA) certifications: Certified CART Provider (CCP), Certified Realtime Reporter (CRR), or Certified Broadcast Captioner (CBC)."**

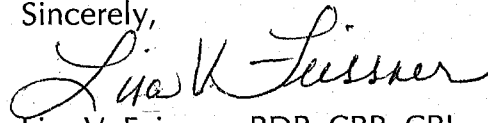
Adopting this language is logical and cost-effective. The National Court Reporters Association (NCRA) is the national organization which both sets standards for the CART profession and provides certification testing to qualified candidates. Adopting this language will result in **no cost whatsoever** to the State or any other entity and will best serve those students for whom a CART provider is deemed an appropriate accommodation under an IEP.

A well-qualified CART provider can be a disabled student's lifeline to a complete understanding of the materials being taught in the classroom. A CART provider who is not qualified can do more harm than good, and in the classroom he or she does so at the State's expense.

I believe the State Board of Education will be doing a disservice to the students it serves if it does not establish these minimum qualifications requirements for CART providers. I therefore urge you to adopt the suggested language and incorporate same into the amendments to 22 Pa. Code Chapter 14.

Thank you for your consideration.

Sincerely,



Lisa V. Feissner, RDR, CRR, CRI  
Immediate Past President  
Chair, Government Relations

cc: Sharon Behun, ODHH