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10 S. 19th Street
Pittsburgh, PA 15203
T: 412/431-5900
F: 412/390-2491

1816 Chestnut Street
Philadelphia, PA 19103
T: 215/587-6784
F: 215/587-6708

www.aftpa.org

Ted Kirsch
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John Tarka
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INDEPENDENT REGULATORY
COMMISSION

July 25, 2007

Mr. Jim Buckheit
Executive Director, State Board of Education
333 Market Street
Harrisburg, PA 17126-0333

Dear Mr. Buckheit:

On behalf of AFT-PA, I would like to express our grave concerns over the caseload chart put forward in the proposed Chapter 14 Regulations. Upon careful review, research and discussion we have determined that not only is the proposed chart difficult to interpret and ambiguous, but also the proposed caseload sizes at Levels II and Level III would radically increase the numbers that each teacher would be forced to serve and radically decrease the delivery of a appropriate services to our special education students.

As the chairperson of the AFT-PA Special Education Committee, I recently conducted a survey to determine how the proposed levels would effect the caseload sizes of some of our members. I received approximately 150 responses (in an addition to a number of calls from people who were exasperated by the chart and felt unable to respond adequately).

The results of the survey were alarming:

- * At the Elementary (K-5) level, caseloads would be far more than doubled (increase of 2.5)
- * At the Middle School (6-8) Level, caseloads would be nearly doubled (increase of 1.8)
- * At the High School (9-12) Level, caseloads would be more than doubled again (increase of 2.1)

Obviously, these numbers are unacceptable to any educator, parent, advocate or person who cares about the education of our special needs students. They would contradict of all that has been learned about what makes special education "special."

Further, the reality is that many of our special educators are leaving the profession now due to the unreasonable demands of paperwork, and compliance. How could they be asked to double a load that is already nightmarish?

AFT-PA will continue to work with PSEA, the Special Education Communication Council and other educational groups to keep the caseload sizes reasonable and appropriate. We trust that the State Board will adjust this unacceptable chart/proposal as soon as possible.

In addition, there are several other areas that we would believe should be revisited and revised.

14.105 Personnel – Instructional Paraprofessionals and Educational Interpreters

It is unreasonable to set such high standards for positions which, in many cases, are poorly paid and difficult to come by already. Staffing these positions would be extraordinarily difficult, if not impossible, in many districts throughout the Commonwealth.

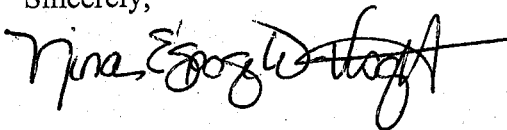
14.155 Early Intervention – Range of Services

In larger, more population-dense districts, the caseload range of 20-40 children may be feasible since traveling is not so much of an issue. However, in many suburban and rural districts where itinerant teachers have to cover much more ground to just get to their students, a minimum of 20 students could greatly decrease the amount of services students could receive. A range of 10-40 would accommodate all district types.

The definition of EI Classroom teachers is still undecipherable to me or to any of my EI colleagues who have read it. Please provide a much clearer definition.

Thank you for your time in reviewing our concerns. We look forward to your response and, hopefully, positive changes in the Proposed Regulations that make sense for our students and our educators.

Sincerely,



Nina Esposito-Visgitis
Chairperson, AFT-PA Special
Education Committee
Vice President for Pittsburgh AFT-PA

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cc: John Tarka, Executive Vice-President
Dee Phillips, Special Assistant to the President