

July 25, 2007

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INDEPENDENT REGULATORY
REVIEW COMMISSION

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JUL 30 2007

PA. STATE BOARD
OF EDUCATION

Mr. James Buckheit
Executive Director, State Board of Education
333 Market St.
Harrisburg, PA 17126

Dear Mr. Buckheit:

As the grandmother of a grandson with a visual preception disorder and a grandson with asperger's syndrome, I am involved daily with these children and their school studies. I have been on many occasions, less than pleased with some of the elements of their special needs and how they are addressed in the school system. Special needs children need legislation and funding that looks out for their needs and provides the best possible education for their future.

I want to make my concerns known regarding the language, definitions and provisions as stated in the volumn of pages in the **State Board of Education Regulations Chapter 14 Special Education Services and Programs May 2007.**

Language should be consistent with IDEA. *14.124 (c) Student with mental retardation is preferable to mentally retarded. 14.145 (a) Student with disability is preferable to student who is disabled. Student with mental retardation and student with disability place less of a label on the student.*

Definitions must be more specific for the the following terms used throughout the draft. Terms such as: Screening; Qualified personnel for delivery of RTI; LRE - meeting the needs of the student take priority over where it takes place; What is meaningful educational progress and how is it measured; the word appropriate is too vague; What are academic standards? These are all too vague and must have more specific definition in the usage.

Response to Intervention needs to be more specific, as to implementation of procedures, and time lines for each tier. It would not be appropriate to delay evaluation for RTI with students beyond third grade. Valuable time would be wasted and certainly is inconsistent with early identification and early remediation.

Least Restrictive Environment (14.145) needs to be defined. Placing a paraprofessional or a special needs teacher into the classroom to help a special needs student is not always a solution. These special needs many times needs to be one on one with the teacher in a setting other than the classroom with all the other students. Co-teaching precludes the special education teacher from being available to the student out of the full class room setting. Itinerent students need help outside the classroom during the school day. Many times these students can only receive such help by going to school early or staying after school.

Each and every issue can not be addressed in one letter however, I do want to address one more item. Regulations for special needs students call for parent training. One of my grandson's is now a junior in high school and we have never received this training. This needs to be explored and understood why it is not being implemented by the school systems.

The reason for writing and pointing out areas that must be readdressed is to make a statement regarding the rethinking of many areas of these provisions before they are passed and implemented. It is my understanding that no hearings were held to receive input from groups such as educators, professional associations such as LDA or even parents.

Thank you for your time and consideration on this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lois M. Runkle".

Lois M. Runkle

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