

**CENTRAL
INTERMEDIATE
UNIT**

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Kerri A. Bloom
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July 26, 2007

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PA. STATE BOARD
OF EDUCATION

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

Dear Mr. Buckheit:

We're writing on behalf of the Central Intermediate Unit and our 12 constituent school districts regarding the proposed amendments to Chapter 14 Special Education Services and Programs. Two sections of the regulations are of utmost concern to our intermediate unit and member school districts:

§14.105 Personnel - Paraeducators

It is our understanding that the intent of revising Chapter 14 is to align the chapter with the Federal Individuals with Disabilities Education Act yet the personnel requirements as proposed will actually exceed the federal requirements for both IDEA and NCLB. The impact from both the recruitment aspect, as well as financial perspective, will be detrimental to our programs. At the present time only a small percentage of the special education paraprofessionals in our region have any post secondary education, rather candidates have a high school education and receive in-service and/or on the job training to develop and hone their skills. Current pay for newly hired special education paraprofessionals is at or near minimum wage. It will be impossible to recruit and retain paraprofessionals unless salaries are increased. Thus our member school districts will be forced to raise local taxes to continue to support ever rising special education costs. It is our position that the requirements for special education paraprofessionals should align with those outlined in IDEA and NCLB.

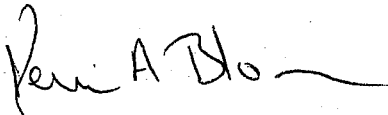
§14.105 Personnel - Replacement Services

While we support revising the current Chapter 14 caseload charts, it is clearly evident that the proposed chart for replacement services (i.e. Level I, Level II, Level III, and Level IV services) is not the answer. One could conclude, after attending a meeting with Linda Rhen and fellow special education administrators on July 18, 2007 at Capitol Intermediate Unit, that the number of interpretations of the proposed language for that section probably equaled the number of attendees at the meeting. Our region is primarily concerned that the maximum caseload for Level IV services, as described in the proposed regulations, would be 8 students. If this proposal is passed, a minimum of 5 to 10 new

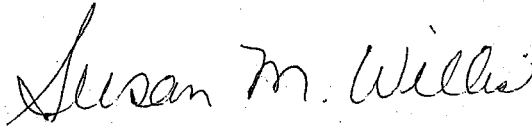
classes will be required for our region. The financial impact will be devastating as each new class will cost approximately \$100,000 to \$125,000. Even if our financially strapped districts were able to fund the classes there won't be space available for those classes. We strongly encourage the State Board of Education to convene a work group of special education administrators to further address the caseload issue.

Thank you for your time and consideration.

Sincerely,



Kerri A. Bloom
Executive Director



Susan M. Willis
Special Education Director