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Jim Buckheit, Executive Director
STATE BOARD OF EDUCATION
333 Market Street
Harrisburg, PA 17126-0333

INDEPENDENT REGULATORY
REVIEW COMMISSION

Re: Chapter 14 Regulation Revision

Dear Mr. Buckheit;

On behalf of the School District of Philadelphia/Intermediate Unit 26 we encourage the State Board of Education to consider the enclosed information regarding the Caseload for special education requirement in the proposed Chapter 14

1. The levels of service designated as Level I, Level II, Level III and Level need clarification. The concerns over the proposed language include:

- The presumption that all students assessed on the alternate academic standards receive Level IV service.
- Ambiguity over the amount of service recorded for Penn Data being confused with setting where service is provided.
- Ensure that the language describing the caseload numbers are attached to case management and not to the students receiving instruction at any one time.
- Creating a paradigm shift that effects change in resource allocation, promotes inclusive practices and focuses on supplementary aids and services.
- District's must now consider additional staff/classroom space when promoting inclusive practices as they face tightened budgets and expanding costs.
- Maintain the current Caseload for special education chart in §14.142 as an organization tool that deepens the understanding of the maximum caseload allowed on a single teacher's roll or add specific examples (e.g. co-teaching) to the appropriate level as indicated in the March 21, 2007 version of the Proposed Regulations.
- Allow 35 as the maximum caseload for teachers providing both itinerant and resource service.
- Clarify if mixed categorical caseloads are now the preferred method of service delivery.

2. A caseload of 65 is not viable for adequate provision of speech and language services.

- It is recommended that a formula based on the population being served by the therapist is a better model for provision of speech and language services than a maximum caseload.

3. The current caseload language fails to provide flexibility in the Special Education Plan.

- Several Regions report being advised by their BSE SPOCs not to request caseload variances for caseload excess.
- For the last several years IU 26 has been required to submit a caseload variance for it's contracted ES classes and has had it's IU Plan approval held in abeyance pending PDE approval.

4. The need for additional language clarifications include:

- The ambiguity of the proposed Life Skills Support definition is likely to cause more students to be evaluated for Life Skills Support than Learning Support.

Sincerely,

Brenda B. Taylor
Associate Superintendent
Office of Specialized Services