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Coalition for Inclusion Advocates
501 Paper Mill Road
Oreland, Pennsylvania 19075

July 31, 2007

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

RECEIVED
2007 AUG -6 AM 10:25
INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Mr. Buckheit:

The Coalition of Inclusion Advocates, a network of people and organizations across Pennsylvania, is writing this letter to provide our strongest support for the comments and statements made by the VALUE Coalition in their letter to you of July 16, 2007 and By PA. TASH in their letter to you of July 23, 2007.

The version of Chapter 14 which was passed by the State Board in May, 2007 with specific reference to 22 Pa Code S14.133, is more than a step back. It sends the message, loud and clear, that educators and others working with children are allowed to ignore what children are trying to communicate through behaviors, which can be quite important to know, such as behavior that may be communicating physical pain, frustration, anxiety, reactions to concerns that are being misinterpreted or environmental discomfort. This chapter, as written, opens up the likely possibility of abuse by ignorance because it does not require a reasonable and thoughtful understanding of the communication of the child nor the opportunity for knowledgeable and thoughtful educators and therapists to have a full and rich experience in helping a child develop a more appropriate and useful communication and behavioral system. Further, it ignores twenty years of literature in the areas of Positive Behavior Support and Augmentative Communication. By ignoring these critical bodies of developed knowledge and expertise, we hurt children, make it harder for educators and families and further secure Pennsylvania's current position as 48th among the 50 states in implementation of the federal law. .

We would suggest that you look to your colleagues in the Office of Developmental Programs who work with many people with behavioral challenges and have developed and implemented enormous competence and skill. The Educational system serves students for a maximum of 17 years. No one 'graduates' from the Office of Developmental Programs, post school. Leadership in the last two administrations have mandated that people in all levels of care of people with developmental disabilities receive the requisite and ongoing training that maintains the health, welfare and safety of the individuals served. If the Office of Developmental Programs is doing this, how can we expect any less of the Department of Education and the 501 school districts?

We look forward to seeing this portion of Chapter 14 re-written with a valued set of expected practices, as outlined in the VALUES and PA. TASH comments. We are all proud Pennsylvanians who, as the state that originally brought the opportunity of education for children with special needs to the nation in the PARC Consent decree, would like to see Pennsylvania restored to our original luster.

Thank You.

Sincerely,

A handwritten signature in cursive script that reads "Marianne Roche".

Marianne Roche
Convener

CC: Arthur Coccodrilli, Chair Independent Regulatory Review Commission
The Honorable James J. Rhoades, Senate Education Committee
The Honorable Jeffrey E. Piccola, Senate Education Committee
The Honorable James Roebuck Jr., House Education Committee
The Honorable Jess Stairs, House Education Committee
The Honorable Dennis O'Brien, Speaker, House of Representatives
The Honorable Barbara McIlvaine Smith, Chair Committee on Special Needs
The Honorable Gerald Zahorchak, Secretary of Education
Members of the Coalition for Inclusion Advocates