

KEYSTONE OAKS SCHOOL DISTRICT

OFFICE OF THE SUPERINTENDENT
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October 3, 2007

Mr. James Buckheit
Executive Director
State Board of Education
First Floor
PA Department of Education
333 Market Street
Harrisburg, PA 17126

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Dear Mr. Buckheit,

Thank you for this opportunity to provide my reaction to the Proposed Chapter 14 Regulations for Special Education as posted June 6, 2007 on the Pennsylvania of Education website, as well as subsequent drafts.

After careful review of the Proposed Regulations, I would like to share the following comments and recommendations for your consideration:

1. The qualifications for paraprofessionals listed are unnecessarily rigorous for most of the assistants in Special Education to meet the needs of students they serve. This is especially true of assistants serving students with more severe learning needs.
2. In order to hire paraprofessionals that meet the proposed qualifications, school entities will have to significantly increase compensation to attract and maintain people with this level of education, and school entities will have to expend considerable resources on training or course credit reimbursement. This requirement has a significant financial impact on school districts.
3. School entities experience enough difficulty keeping assistant positions filled. Requiring applicants to meet the criteria outlined will make it even more difficult to fill paraprofessional positions. Repeated and persistent vacancies in paraprofessional positions negatively affect the programs for students.



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4. **Learning Support** – Proposed caseload maximums of 20 resource and 15 part time will significantly impact entities who have several classes at the secondary level where teachers are assigned to teach by subject area.

These teachers could actually teach 60 or more part-time students in a day, but only be responsible for 20 IEPs when the IEP responsibility is split between all learning support teachers.

These caseload numbers will cause districts, in many cases, to hire additional teachers, where with the current standards students are being instructed appropriately with current staffing patterns. The additional expense, lack of highly qualified teachers and finding adequate space are very real concerns for districts under the proposed regulations.

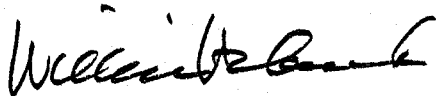
Recommendations

Retain the caseload / class size charts and definitions currently in place in Chapter 14 until such time as a better system is developed that will increase the educational programs for students and not adversely affect school districts financially and facility-wise.

If changes are considered for the **Multiple Disabilities Support** classes, then increasing the caseloads to 12 part-time and 12 full-time would be a workable figure to appropriately educate these students.

Again, thank you for this opportunity to provide input to the proposed Chapter 14 Regulations for Special Education. I appreciate the efforts being made to solicit comments from all parties, as well as the time and effort that have gone into making the proposed regulations a tool to provide an appropriate education for all students.

Sincerely,



William Urbanek, Ed.D.
Superintendent

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