

Alliance of Approved Private Schools Commonwealth of Pennsylvania

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INDEPENDENT REGULATORY
COMMISSION

#2618

ACLD Tillotson School
Buttonwood Farms/Delta School
Camphill Special School, Inc.
Craig Academy
Davidson School
DePaul School for Hearing and
Speech
Devereux Foundation
Dr. Gertrude A. Barber National
Institute
Easter Seals of
Southeastern Pennsylvania
Easter Seals, Western Pennsylvania
George Crothers
Memorial School
Green Tree School
HMS School for Children
with Cerebral Palsy
Martin Luther School
Melmark School
Pace School
Pressley Ridge Day School
Royer-Greaves School
for Blind
The Day School at
The Children's Institute
The Pathway School
The Vista School
The Watson Institute
Valley Day School
Wesley Spectrum Highland School
Woods Services
Wordsworth Academy

TO: Pennsylvania State Board of Education
FROM: Thomas Fogarty, M.Ed.
President of the Alliance of Approved Private Schools
Nan Porter, M.Ed.
Vice President of the Alliance of Approved Private Schools
RE: *Chapter 4. Academic Standards and Assessment, General Provisions*
Comments in regard to proposed changes
DATE: November 29, 2007

We are writing on behalf of the Alliance of Approved Private Schools (Alliance). The Alliance represents 26 of the Commonwealth's 30 approved private schools. The approved private schools provide highly specialized education and related services to 1.3% of the Commonwealth's students with severe and complex disabilities. These severe and complex disabilities include the following: autism/pervasive development disorders, blind, cerebral palsy, muscular dystrophy, mentally retarded, neurological impairments and brain damage, serious emotional disturbance, and other health impairments such as asthma, attention deficit disorders, congenital heart and other heart related disorders, epilepsy and other types of seizure disorders, orthopedic disorders, Tourette syndrome, visual and auditory impairments, etc. Attached is additional information on the Alliance, including a membership list. Students who attend APS demonstrate severe and complex ranges of disabilities. The majority of children and youth served by the APS are referred by the local school districts and/or parents. For an APS placement to be a student's least restrictive environment, both of these parties must be in agreement with the placement, and the student's Individual Education Program (IEP) must necessitate a level of service available only in an APS. The Pennsylvania Department of Education's Bureau of Special Education can only grant approval for tuition assistance.

Comments:

The Alliance appreciates this opportunity to express our collective thoughts for your consideration as the State Board of Education contemplates changes to *Chapter 4. Academic Standards and Assessment, General Provisions*. The Alliance is especially concerned for those students who have documented disabilities and require special education services as defined by their specific Individual Education Plans (IEP) per Chapter 14.131 Individual Education Program.

The proposed changes to Chapter 4 concerning graduation requirements do not appear to mention any changes to the present graduation requirements that are now in place for children with disabilities and an IEP.

General Recommendation:

The Alliance strongly recommends that the current graduation requirements which are already in place for students with disabilities remain in place. We support the present PDE regulations that permit students with a documented disability/s and an IEP to graduate from a high school if the student meets the specific educational objective in the student's IEP.

On behalf of the Alliance, we thank you for the time and careful consideration that we know you will afford these recommendations. We welcome any other opportunities you are willing to provide to those of us who are dedicated to the improvement of special education programming and services, and quality of life for all of the children we serve.

We appreciate the Board's review and consideration of the Alliance's comment on the proposed changes to Chapter 4. **If you have any questions our position, please contact Kara Beem of Capital Associates, the Alliance's public affairs consultants, at (717) 257-2539 or at beem@capitalassoc.com**

Alliance of Approved Private Schools

Serving Students with Disabilities in the Commonwealth of Pennsylvania

A Leading Special Education Resource in Pennsylvania

Overview:

The Alliance of Approved Private Schools is a 501 (c) (3) not-for-profit organization representing 26 of the 30 licensed and approved private schools in the Commonwealth of Pennsylvania. These schools were granted special authority by the Pennsylvania Department of Education (PDE) to serve children who are challenged by severe and complex disabilities. Known as Approved Private Schools (APS), these schools are either freestanding not-for-profit organizations or part of larger not-for-profit organizations. APS provide special education services to children who, by the nature, severity, and complexity of their disabilities, cannot be appropriately served in a public school special education program.

Section 1376 of the Public School Code is the statute that created the Approved Private Schools in 1961. Further definition is provided in Title 22 Pa. Code, Chapter 171 and Act 70 of 2004. The APS serve students with the most severe who cannot receive appropriate educational and related services in the public schools.

Approved Private Schools (APS) Are Part of Pennsylvania's Special Education System:

The Individuals with Disabilities Education Act, a federal law reauthorized in 2004, requires each public agency to ensure that a continuum of placements be available to meet the need for special education and related services for children with disabilities. The APS are an integral part of the continuum of special education services in Pennsylvania and majority of these not-for-profit schools also commit considerable private funds to serve Pennsylvania children who are challenged by severe and complex disabilities. If public schools were able and required to provide similar range of unique special education services, the cost to the Commonwealth of Pennsylvania and/or the local school districts would be prohibitive.

Number of Students and Disabilities Served:

Approved Private Schools provide highly specialized, effective, therapeutic programs to approximately 4,000 Pennsylvania students between the ages of 2 and 21. The Approved Private Schools serve approximately 1.3% of the Commonwealth's 270,075 school-age special education population (PDE's 2005-2006 statistic). APS are small, specialized educational facilities, each serving from 50 to 400 students who are challenged by severe disabilities. These schools provide a range of state-of-the-art services to children challenged by one or more of the disabilities for which the school is licensed and approved. The majority of students enrolled in APS also have related disorders and/or

medical problems such as asthma, attention deficit disorders, congenital heart and other heart related disorders, epilepsy and other types of seizure disorders, orthopedic disorders, Tourette syndrome, visual and auditory impairments, etc.

Approved Private Schools are approved to serve students from one or more of the following categories:

- Autism/Pervasive Developmental Disorder
- Blindness
- Cerebral Palsy
- Deafness
- Muscular Dystrophy
- Mental Retardation
- Neurological Impairment/Traumatic Brain Damage
- Serious Emotional Disturbance

How PA Students Are Approved for Tuition Reimbursement by PDE

The PA Department of Education (PDE) has created a formal, strictly controlled process that must be completed before any student is approved for tuition reimbursement in an APS.

- The educational program outlined in each student's Individual Education Program (IEP) necessitates a level of service available only in an APS.
- The student's parents and the home school district must agree to placement in an APS.
- If the home school district wishes to obtain tuition assistance from the state, a formal request including documentation of the student's disability and the need for intensive education and related services is sent to the state.

How PDE Approved Students Are Funded:

Students approved by PDE may be funded by the following sources:

- A line item within the State's education budget fixes each APS's annual allocation.
- The referring school district pays 40% and the state pays 60% of the APS tuition charge for school age children.
- If an APS allocation is exhausted, the school district may reimburse the APS for 100% of the tuition cost.

While the majority of funds for students attending APS may come from PDE and the school districts, the Approved Private Schools, all not-for-profit organizations, also commit considerable private funds in support of the Commonwealth's children who are served in these unique special education facilities.

ALLIANCE OF APPROVED PRIVATE SCHOOLS MEMBER LIST 10/07

SCHOOL	AUT/ PDD	BL	CP	DF	MD	MR	NI	SED
Camphill Special School, Inc.						5-21R		
Children's Institute Day School	2.7-21		2.7-21				2.7-21	
Craig Academy								6-21
Davidson School (Elwyn)	3-21R	3-21R		3-21R		3-21R	3-21R	3-21R
Delta School/Buttonwood Farms	4-21						4-21	6-21
DePaul Institute				2-21				
Devereux Foundation	5-21R						5-21R	6-21R
Dr. Gertrude A. Barber National Institute	2-21		2-21		2-21	2-21	2-21	
Easter Seals Society of Western Pennsylvania	3-8		2-8		2-8		2-8	
Easter Seals of Southeastern PA(Philadelphia Area)	2-8		2-8		2-8		2-8	
The Education Center at the Watson Institute	3-21R		3-21R		3-21R		3-21R	
George Crothers Memorial School			2-21			2-21	2-21	
Green Tree School	4.7-21						4.7-21	6-21
HMS School for Children with Cerebral Palsy			2-21R				2-21R	
ACLD Tillotson School							4.7-21	
Martin Luther School								6-14.5
Melmark School	5-21R					5-21R	5-21R	
Pace School	6-14						6-14	6-14
Pathway School	5-21R						5-21R	
Pressley Ridge Day School								6-21
Royer-Greaves School for Blind*		4.7-21R						
The Valley Day School	4-21						4-21	4-21
The Vista School	3-21							
Wesley Spectrum Highland School	6-21							6-21
Woods Services							4.7-21R	
Wordsworth Academy	3.5-21R						3.5-21R	6-21R

*Blind with secondary exceptionalities including: CP, MD, MR, NI and SED

NOTE: "R" indicates residential programs available

LEGEND

AUT/PDD	Autism/Pervasive Developmental Disorder
BL	Blind
CP	Cerebral Palsy
DF	Deaf
MD	Muscular Dystrophy
MR	Mentally Retarded
NI	Neurologically Impaired
SED	Serious Emotional Disturbance