

PENNRIDGE SCHOOL DISTRICT

Perkasie, Pennsylvania 18944-2295

2635

Robert E. Phillips Director of Pupil Services 215-453-2785 rphillip@pennridge.org

September 10, 2007

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

RE: Chapter 16 Proposed Rule Making

Dear Mr. Buckheit,

We are writing to express our deep concern regarding two proposed revisions to Chapter 16. While we value the effort undertaken to ensure the quality of education afforded our gifted students, we feel that the decisions regarding caseload size and present levels of educational performance place undue hardship upon local school districts.

The lack of foresight with regard to the impact of the decision to reduce caseload size from 75 students to 60 students while increasing individual teacher's class rosters from 20 to 25 is not only educationally unsound but fiscally irresponsible. A statement in the "proposed rulemaking" included that the decision included feedback from schools. As attendees at the roundtable discussions, we were not in favor of such a proposal and find it hard to believe, in the era of Act 1, many school districts can afford such a measure. While providing the best possible programming for our students, we have a responsibility to be fiscally responsible to the taxpayers of our community as well. By implementing this proposed revision, we will have to significantly alter our program. This measure will impede our ability to provide continuity of teachers to our students; affect individualized instruction due to larger class sizes, and ultimately impact curricular decisions. The statement that, "the proposed rule making will not result in significant costs or savings to school entities..." is not true. By limiting caseloads, districts will be forced to hire additional personnel. While we are proud of our gifted program and continually encourage screening and evaluation of potentially gifted students, we now are faced with the hardship of potentially having to add several new gifted staff. In our district, our gifted education teachers are not given other instructional duties. The sole responsibility of the gifted teachers in our district is to work with the gifted population. The decision to unilaterally limit case size to 60 students does not recognize this fact. Deference should be provided for school districts that employ teachers solely dedicated to the education of gifted students.

Pennridge District Education Center • 1506 North Fifth Street • Perkasie, PA 18944-2295 Telephone 215-257-5011 • Fax 215-453-8699 • http://www.pennridge.org

Mission Statement

The Pennridge School District, in partnership with family and community, will provide all students with numerous and varied opportunities to gain the knowledge and skill necessary to grow into healthy, productive citizens equipped for life-long learning.

With regard to the proposed changes to the present levels of educational performance (PLEP), we would like to once again reiterate our concern that the intent of Chapter 16 is not to provide a separate, disconnected curriculum. Although we agree the PLEP should include a student's current levels of performance; the use of curriculum based assessment, teacher observations, and student grades should suffice unless a clear need for acceleration is warranted.

Our concern is both for the gifted students we serve and the tax payers that reside within our community. Limiting caseload size has no effect on the quality of education provided to our students; whereas increasing the class rosters will have a direct impact on educational quality. Chapter 16 should never provide a separate, disconnected curriculum. It is once again our opinion, that unless the two aforementioned concerns are taken into consideration prior to adoption of the new regulations, the burden placed on all stakeholders will far exceed the good that is intended.

Sincerely,

Robert E. Phillips

Director of Pupil Services

Cc: Dr. Robert Kish, Superintendent

Deborah Brady

Coordinator of Gifted Services

Which Diady