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PA. STATE BOARD OF EDUCATION PSEA PENSYLVANIA STATE & .

Leadership for Public Education

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Dear Mr. Buckheit:

September 24, 2007

NDEPENDENT REGULATORY

PSEA would like to thank the State Board for the opportunity to express our views on Chapter 16 related to gifted education on behalf of the more than 185,000 PSEA members who are educators, paraprofessionals and related service providers.

PSEA supports a majority of the proposed changes to Chapter 16. We feel that the changes will benefit the children and will help with communication and team building with families.

## Strategic Plans

We value recommendations that allow parents and staff to see what process a district will use for the identification of children who are gifted and in need of specially designed instruction. In the era of web based resources, this allows everyone equal access to information about the processes used. This has the potential of saving time and resources as parents and staff can access the information independently for clarification and reference.

## Single IEP for students dually diagnosed

Having a single document in which all the issues related to a specific student are documented and is used as the tool to drive the instruction and supplementary aids and services is good for the child. It is key that all of the professional staff, the parents and the LEA share information and work on common goals. PSEA understands that this also is an item that had to be addressed because of the Gaskin Settlement Agreement.

#### Specific deficits and eligibility determination

PSEA is pleased to see the clarification that deficits in memory or processing speed cannot be the sole basis for determining that a student is ineligible for gifted education services. More research is being done and the results are showing that students who have both specific learning disabilities and are gifted are able, in many cases, to compensate for their disabilities. However, current testing methods that do not accommodate their disability eliminate them from being considered gifted and eligible for gifted programs such as we offer around the Commonwealth. We applaud the State Board for helping to clarify and give eligible students the opportunity to participate in the gifted program.

Mr. Buckheit September 24, 2007 Page 2

Permission slips to parents for evaluations

We supported this measure in Chapter 14 and we support the clarification in Chapter 16 that requires the school entity to send home a permission slip for child find when a parent makes an oral request. Both for the sake of timely evaluations and continuity, we are in favor of this proposed provision.

Evaluation period

We support the State Board's position of increasing the evaluation period from 45 to 60 school days. Between observations, trial periods for strategies, testing and teaming, this allows the evaluation team the time needed to complete the process and provide the GIEP team with the most complete and up-to-date information on the child. In other words, this provides the GIEP team with the tools they need to make informed choices when planning for the child.

Teachers of the gifted at GIEP meetings

Clarification in language that identifies the teacher as an integral member of the GIEP team is key in the development of a GIEP that works for the student. PSEA supports the current proposal.

## Caseload reduction

PSEA is encouraged by the proposal to reduce the caseload of the teacher of the gifted from 75 to 60 students. We take this as recognition of the growing complexity of case management as this field matures.

PSEA has one concern with the proposed regulations, as follows:

# Class Roster

PSEA's concern with the regulations is that the class roster would rise from 20 to 25 students. Especially at the younger ages, many studies recommend a reduction in the class size because students benefit from the smaller ratio of adults to students. This is especially helpful in the area of reading. It benefits the child to have the same ratio of adults to students as is found in an ever increasing number of schools in the Commonwealth, i.e. 20 students or below. Even with the assumption that a gifted child might be above grade level in reading while in elementary school, these smaller class sizes are important for the students. This can help to maximize their potential and support Pennsylvania's goal to support Pennsylvania's employers with qualified individuals.

Mr. Buckheit September 24, 2007 Page 3

We appreciate your consideration in these matters as you produce the roadmap for gifted education for the students currently in our programs and for those entering our public schools.

Sincerely,

Bernard R. Miller, III

Director for Education Services

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