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INDEPENDENT REGULATORY  
REVIEW COMMISSION

June 13, 2008

2696

Mr. Arthur Coccodrilli  
Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

RE: Chapter 4 – Academic Standards and Assessments 6-312; IRRC Number 2696

Dear Mr. Coccodrilli,

The Mental Health Association in Pennsylvania is a membership non-profit organization with 17 affiliates who serve all the regions of our Commonwealth. We regularly assist families and their children who are trying to access a public education, while coping with serious mental health needs. Many of these children have little or no accommodations from their public schools, despite legal mandates that compel schools to make education accessible to students with disabilities.

We oppose the Chapter 4- Academic Standards and Assessments 6-312, on the behalf of all students, both those who are already struggling to graduate because of their disabilities, including behavioral health disorders, and students who are at risk of developing such disorders in conjunction with school failure related to loss of their ability to graduate from high school.

The Education Law Center, VALUE, and numerous other advocacy and educational association oppose these regulations specifically because they are not in the best interest of students.

We heartily concur with these, our colleagues, and have signed on under VALUE in opposition. We take this additional step to weigh in individually to underscore our opposition, and ask that the Independent Regulatory Review Commission act in the best interest of Pennsylvania's students and families and reject Chapter 4.

We note that in a different world, where all schools have adequate funding and services, that instituting accountability is a right and proper charge. However, it seems to us that Chapter 4 puts the cart before the horse, demanding that students meet standards that our public schools can not, or in the case of students with disabilities, often will not, support them in acquiring.

And finally, in a world where tomorrow's work place is often upon us before we can prepare people to compete there, using 19<sup>th</sup> century paper and pencil testing to measure competency seems short sighted, if not foolhardy. Innovative practices like school to work, where students are on job sites prior to graduation, and can demonstrate real world skills, or academic experiences that mirror modern vocational skills like group decision making and verbal persuasion are certainly as important to Pennsylvania's graduates as a one time test of what they have memorized from a book.

Thank you for your attention in this matter,

A handwritten signature in black ink, appearing to read "Wendy Luckenbill", is written over a horizontal line.

Wendy Luckenbill  
Children's Policy Coordinator