

SHIPPENSBURG AREA
317 North Morris Street



SCHOOL DISTRICT
Shippensburg, PA 17257

June 13, 2012

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IRRC

Ms. Michelle L. Elliott
Regulatory Analyst
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

Dear Ms. Elliott:

On behalf of school administrators, law enforcement officials and other emergency response professionals located in the Shippensburg Area School District I am writing to strongly recommend that the Independent Regulatory Review Commission (IRRC) reject the State Board of Education's Safe Schools regulation #6-325 (IRRC#2928) as proposed. The reasons for recommending rejection are summarized below:

- With today's technology our District is able to provide first responders with student information, through an internet-based student information system. This system would provide real-time student information, rather than reports that are required to be populated by September 30 of each school year. Electronic submission instead of hard copies of student information would be less costly to the Districts and provided more up-to-date information to the Emergency Responders.
- This regulation targets only public schools and does not require private and non-public schools to comply with safety regulations. SEE definition of School Entity. Should not the safety and security of all children residing in the Commonwealth of Pennsylvania be of concern? A related regulation (Title 35) in its requirement for school emergency plans covers all schools.
- Our district receives their yearbooks at the end of the each school year or after school is out for the summer. While I understand that yearbooks would provide a picture of the student to an emergency responder, that information would be a year old. Furthermore, our yearbooks cost approximately \$50 each. Our district has 3459 students with six (6) school buildings. The cost to the District could be \$500 after providing a yearbook to the police stations and fire companies within our District. I believe this is inefficient use of tax payer money, for Districts to be required to purchase yearbooks for the Local and State Police and Fire Companies, who will probably not even use them.
- This regulation was developed to create a safer public school environment. By requiring the District's to provide documents to all fire departments, I believe this could have a negative impact to keeping our students safe. For example, our fire companies have volunteer firefighters, some of which are even students, serving through the junior firefighter program. Therefore, the District may be providing students our emergency plans and information on other student's that should be



maintained as confidential. The District could be held liable to violating the Family Education Rights and Privacy Act.

- The PASBO Safety Committee would urge the rejection of this regulation and recommend the State Board of Education convene a meeting of schools officials, law enforcement officers along with fire, EMS and emergency management officials to construct a viable alternative to the current proposed chapter 10 regulations. (The third submission of the proposed chapter 10 regulations (re-submitted only 3 business days after proposal 2 was withdrawn) re-inserted the original language and did not involve any discussions with stakeholders.

While the intention of this legislation is admirable, in its current form, it does little to prevent school violence, and may in fact result in the reduction of successful programs and personnel time which have previously and successfully advanced school safety and security.

Respectfully,

Nicole L Weber
Assistant Business Administrator