



# East Pennsboro Area School District

Our Vision: *World Class Performers and Productive Citizens*

Web Site: [www.epasd.org](http://www.epasd.org)

2928

**Bruce M. Deveney**  
Superintendent of Schools

Dear Ms. Elliott:

On behalf of the East Pennsboro Area School District we are writing to strongly recommend that the Independent Regulatory Review Commission reject the State Board of Education's Safe Schools regulation #6-325 (IRRC#2928) as proposed. The Following reasons for recommending rejection are summarized below:

- This regulation has significant fiscal and personnel impacts on school entities as defined in the regulation. There has been no comprehensive analysis of this regulation, regarding the *financial impact to districts*. As an example: this regulation does not allow, or it is undefined as to use of electronic submission of documents in lieu of hard copies.
- This regulation targets *only* public schools and does not require private and non-public schools to comply with safety regulations. Should not the safety and security of all children residing in the Commonwealth of Pennsylvania be of concern?
- Items required to be submitted annually (i.e. yearbooks) are often outdated when printed and of little or no value in an actual emergency months after printing. The cost of producing additional yearbooks and other items can stretch already shrinking school budgets.
- PASBO's safety committee has *serious concerns* about the operational security of providing documents to all fire departments. The current language proposed in this regulation could be mis-interpreted and ultimately result in a **violation of Family Educational Rights and Privacy Act (FERPA)**.
- 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.

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.

Sincerely,

Bruce M. Deveney  
Superintendent of Schools

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