

**ED, CharterRegs**

---

**From:** Allen, Cameron <Cameron.Allen@pasenate.com>  
**Sent:** Monday, October 18, 2021 4:27 PM  
**To:** ED, CharterRegs  
**Cc:** McCullough, Sara; Arnold, Samuel  
**Subject:** Senator Kearney Public Comment-- Regulation 6-349  
**Attachments:** IRRC Regulation 6-349 Public Comment.pdf

Good Afternoon,

Please find the attached public comment from Senator Kearney on Regulation 6-349.

**Cameron Allen | *Legislative Director***  
**Senator Tim Kearney | 26<sup>th</sup> District**  
**Senate Box 203026**  
**Harrisburg, PA 17120-3026**  
**Room: 463 Main Capitol**  
**Office 717-787-1350**  
[SenatorKearney.com](http://SenatorKearney.com)

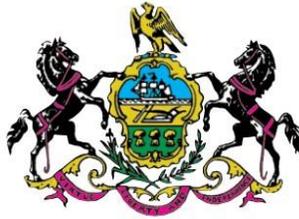
This message and any attachment may contain privileged or confidential information intended solely for the use of the person to whom it is addressed. If the reader is not the intended recipient then be advised that forwarding, communicating, disseminating, copying or using this message or its attachments is strictly prohibited. If you receive this message in error, please notify the sender immediately and delete the information without saving any copies.

26TH DISTRICT  
STATE SENATOR  
**TIM KEARNEY**

SENATE BOX 203026  
THE STATE CAPITOL  
HARRISBURG, PA 17120-3026  
717-787-1350  
FAX: 717-787-0196

130 SOUTH STATE ROAD • SUITE 101  
SPRINGFIELD, PA 19064  
610-544-6120  
FAX: 610-544-6140

51 LONG LANE  
UPPER DARBY, PA 19082  
610-352-3409  
FAX: 610-352-3641



## Senate of Pennsylvania

### COMMITTEES

LOCAL GOVERNMENT,  
MINORITY CHAIR  
APPROPRIATIONS  
EDUCATION  
LABOR & INDUSTRY  
TRANSPORTATION

EMAIL: [senatorkearney@pasenate.com](mailto:senatorkearney@pasenate.com)  
WEBSITE: [www.SenatorKearney.com](http://www.SenatorKearney.com)  
FACEBOOK: [facebook.com/SenTimKearney](https://facebook.com/SenTimKearney)  
TWITTER: @SenTimKearney  
INSTAGRAM: @SenTimKearney

October 18, 2021

IRRC  
333 Market St, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

RE: Comments on Regulation #6-349: Charter Schools and Cyber Charter Schools

To Whom It May Concern,

I write today in support of the proposed regulation #6-349: Charter Schools and Cyber Charter Schools.

This regulation is a step forward towards providing greater transparency and accountability to the charter and cyber charter schools operating across the Commonwealth. However, it is still just a step. There are still points in the regulation that will need greater review and I ask that IRRC consider all the public comment it receives.

For example, there are gaps in the regulation on how the standard application process for charters will compare to local charter school applicants, how renewals of applications will occur, what a random selection process should look like, and what criteria should be considered in the fiscal management and audit requirements, amongst other concerns.

In particular, I believe that a final regulation would be strengthened by making specific improvements.

- § 713.4 Should provide further instruction on criteria for a random selection process to build greater trust in the process and to prevent abuse
- § 713.5 - Cyber charters might not be limited by facilities, but there are other real factors limiting how many students they can optimally enroll and support, and the provisions of this section should reflect the need for enrollment limits for cyber charter schools.
- § 713.7 should provide stricter standards for audits to assess fiscal management

I thank IRRC for the opportunity to provide public comment and applaud the Department of Education for taking this step. Even with potential gaps, this regulation will require greater transparency for Educational Management Service Providers and will help reduce the misuse of public funds by ensuring greater ethics and preventing conflicts of interest. That is why I support regulation #6-349 because any step is a step in the right direction when we have long failed to provide these necessary measures.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Tim Kearney".

Senator Tim Kearney  
26<sup>th</sup> Senate District