

**ED, CharterRegs**

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**From:** Stephanie Westington <stephanie.westington@myhgsd.com>  
**Sent:** Monday, October 4, 2021 4:21 PM  
**To:** ED, CharterRegs  
**Subject:** [External] Regulation #6-349: Charter Schools and Cyber Charter Schools  
**Attachments:** Regulation Opposition Letter.docx

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To Whom It May Concern:

The attached letter is being sent in response to Regulation #6-349. Thank you in advance for your consideration.

Sincerely,  
Stephanie Westington

October 4, 2021

To: The Pennsylvania Independent Regulatory Review Commission  
333 Market St, 14th Floor  
Harrisburg, PA 17101  
[RA-EDCharterRegs@pa.gov](mailto:RA-EDCharterRegs@pa.gov)

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

As the President and Trustee of a Pennsylvania charter school, I am writing to express my opposition to Regulation #6-349: Charter Schools and Cyber Charter Schools.

In my opinion, this regulation does not create a fair and level playing field between authorizers and charter school operators trying to give parents another choice in K-12 education and may impose undue administrative and financial burdens on charter schools.

First of all, as written, the regulation creates a minimum standard that all authorizers must meet, but it does not restrict the ability of the authorizing party to create “over the top” and burdensome requirements during the application process. As written, authorizers can drown charter school administrators in red tape whenever they try to keep their schools open with a renewed charter or expand their schools because parents are happy with the results. The regulation may allow a means for school districts to include requirements that end up being anti-charter, which could result in denial of new charters, renewals of charters, and expansion of charters. How does this benefit Pennsylvania families? A large public school system may not be in the best interest of every child. Parents should have the right and ability to choose the academic environment that is best suited for their child(ren) so that they can flourish as students and young citizens.

In addition, on the surface it appears that the regulation seeks to ensure that teachers and employees at charter schools receive quality healthcare benefits like teachers in public school districts. I can appreciate this cause, as finding a way to provide our teachers with affordable healthcare is a top priority for our charter school. However, I also know that it is highly unlikely that our charter school will receive comparable group insurance rates to that of the larger schools and school districts in order to reduce the employee-paid portion of the premium for our teachers. If our charter school must absorb the entire, or significant portion, of the premium, it could run the risk of shedding jobs, or reducing the financial resources allocated to, or available for, educational tools and endeavors.

I believe these proposed regulations are offered to help authorizers, rather than Pennsylvania parents. These regulations are not balanced and, therefore, should not be put into law. I hope that Governor Wolf and the Department of Education seriously consider these reasons and listen to the voices of administration, teachers, parents, students and others within the charter school community. We want the ability to be treated fairly in order to succeed as charter schools. Unfair regulations are not the answer, but rather legislation that is balanced, bipartisan, and beneficial to all parties.

It is my hope that you rescind this process and work with elected lawmakers to create policies that make sense for all schools. Creating laws through unelected bureaucracy is not what democracy is all about.

Thank you for your consideration.

Stephanie A. Westington, CPA  
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