

**ED, CharterRegs**

From: Andrew Souchet <andrewsouchet@aol.com>
Sent: Tuesday, October 12, 2021 7:21 PM
To: ED, CharterRegs
Subject: [External] PDE #6-349 regulation proposal comment-A. Souchet
Attachments: PDE proposal 6-349 of Sept 8, 2021-A. Souchet comments.pdf

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To whom it may concern:

A letter regarding a pending PDE regulation proposal is attached for your review and consideration. Thank you.

-Andy

224 Harvard Court
Souderton, PA 18964

October 12, 2021

RA-EDCharterRegs@pa.gov

To whom it may concern:

I am against PDE proposed regulation #6-349 dated September 8, 2021 for several reasons.

First, the application does not provide a compelling case, and lacks specificity with regard how the regulation benefits students, parents, and the general public.

Second, the brick and mortar charter school my children attend does, “emphasize accountability, equity, quality, and transparency.” For example, the Souderton Collaborative Charter School (SCSC) sends its stakeholders regular correspondence with substantive information regarding all dimensions of the student experience and school governance. All SCSC staff and board members are a phone call or email accessible.

My children have also attended traditional public schools. My experience is that SCSC is more accountable, equitable, provides a better quality education, and is more transparent than the traditional public school system.

Third, per question (9) page 2, "The regulation is not mandated by any federal or state law or court order or federal regulation. Is this a good use of the PDE’s time?"

Fourth, the charter school my children attend complies with the intent and spirit of the 1977 Charter School Law

As stated in question (10), page 2 of the proposed regulation) charter school exist to:

- "Improve student learning;
- Increase learning opportunities for all students;
- Encourage the use of different and innovative teaching methods;
- Create new professional opportunities for teachers, including the opportunity to be responsible for the learning program at the school site;
- Provide parents and students with expanded choices in the types of educational opportunities that are available within the public school system; and
- Hold the schools established under the CSL accountable for meeting measurable academic standards and provide the school with a method to establish accountability systems."

The charter school my children attend complies with the intent and spirit of the 1977 Charter School Law. Examples include: multiple full-time teachers per classroom, novel teaching methods such as Singapore math, regular and interactive parent-teacher correspondence and collaboration, and the identification and use software to augment instruction such as XtraMath.

Fifth, per question (10) page 2 the regulation does not,
“Explain the compelling public interest that justifies the regulation. Describe who will benefit from the regulation. Quantify the benefits as completely as possible and approximate the number of people who will benefit.”

I read the question 10 statement several times. I cannot identify a “compelling public interest” since one is not provided.

Sixth, the regulation adds an unnecessary administrative and financial burden to the both the charter school *and* local board of directors.

I recommend the proposal be withdrawn.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Souchet". The signature is written in a cursive, flowing style.

Andrew Souchet

Copy:

House Education Leaders:Chair Rep. Sonney
Minority Chair Rep. Longietti
Rep. Steve Malagiri, 53rd District
Senate Education Leaders Chair Sen. Scott Martin
Minority Chair Sen. Lindsey Williams
Maria Collet, Senate District 12