



## ED, CharterRegs

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**From:** Erica S <shesanti@gmail.com>  
**Sent:** Thursday, October 14, 2021 12:05 AM  
**To:** ED, CharterRegs  
**Cc:** erica spadaccino  
**Subject:** [External] Opposition to Regulation #6-349: Charter Schools and Cyber Charter Schools

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IRRC, Secretary of Education Ortega,

This is my public comment. Please make it public record and read in its entirety.  
Erica Spadaccino  
50 Candle Rd Levittown PA 19057

Bucks County

As a member of the public charter school community, I am submitting these comments in opposition to the proposed Regulation #6-349: Charter Schools and Cyber Charter Schools.

The regulation is detrimental to charter schools and cyber charter schools which have stepped up and served our community during the pandemic. It is clear that parents are dissatisfied with brick and mortar schools as clearly indicated by the 3% decrease in enrollment in school districts and the 15% enrollment in charters. This trend is not unique to Pennsylvania, but is reflected across the nation. What is unique to Pennsylvania, is the resistance to embrace charter schools, which is clearly demonstrated by the Governor's refusal to visit a charter, despite the multiple invitations, even to ones located in Harrisburg. This sentiment is only compounded by going to regulation instead of letting the Legislature determine any changes, if needed.

I would like to point out that several states have embraced the surge of transfers to charter schools and have introduced legislation that supports charters in a significant way.

Here are a few examples:

- **California** defeated the most damaging charter school bill this session. This bill would have imposed a significant number of new restrictions and costs on charter schools.
- **Colorado** increased the cap on moral obligation bonds for charter schools from \$500 million to \$750 million and defeated a bill that would have gutted the appellate process.
- **Connecticut** increased per-pupil state funding for charter schools in the context of broader public school funding changes.
- **Florida** allowed postsecondary institutions to serve as authorizers.
- **Georgia** [increased state funding](#) for district-authorized charter schools and ensured districts allocate a proportionate share of federal funding to district-authorized charter schools.
- **Illinois** fought off multiple anti-charter school bills—including one that would prohibit charter school leaders from talking about the pros and cons of unionization with their staff members.

- **Indiana** increased its per-pupil charter school facilities allotment to \$1,000 per-pupil in the first year of the budget and \$1,250 per-pupil in the second year.
- **Maine** charter school [supporters rallied to defeat a bill](#) that would have gutted the law's authorizing and funding provisions.
- **Oklahoma** increased state funding to charter schools (triggered by a state board of education settlement of a charter school funding lawsuit).
- **Tennessee** allocated \$24 million to a charter school facilities fund.
- **Utah** established the Charter School Closure Reserve account only for repayment of funds from a closed charter school

Furthermore, let me quickly correct the idea that charter schools are not centers of innovation as CCA has been recognized nationally as a Green Ribbon School in 2021 for their innovation.

Reference: <https://www2.ed.gov/programs/green-ribbon-schools/highlights-2021.pdf>

Let me quote pages 106-108:

Commonwealth Charter Academy; Harrisburg, Pennsylvania

All virtual, but completely hands-on, agriculture

Commonwealth Charter Academy (CCA) is a Title I public, cyber charter school serving K-12 students across Pennsylvania. Students, 55% of whom are socioeconomically disadvantaged, do not report to a physical location, accessing their work at home, but buildings are maintained to provide a resource for hands-on experiences that would not be accessible in a home setting. CCA started the school year with approximately 10,000 students, which increased to 19,000 during the COVID-19 pandemic.

CCA reaches students through virtual instruction and provides face-to-face opportunities at 11 Family Service Centers. Five of these facilities include drop-in centers or areas where students can choose to report daily or weekly for assistance with their courses, tutoring, field trips, and other programming. Students can participate in field trip opportunities in their area. CCA invested in three mobile classrooms to enhance regional field trips. Each mobile lab specializes in certain activities, with one specifically catering to sustainable learning through aquaponics.

As a cyber-school, CCA is uniquely suited to address sustainability. For example, there is no daily bus commute for students. When a student requests to attend a drop-in center, they are encouraged to take mass transportation, with CCA offering to provide bus passes free of charge. Students bring their lunches if they plan to stay for the day. From home, they submit their work through an online learning management system, reducing paper waste. Many science experiments include items that are typically found in the home, reducing shipping costs for curriculum kits.

In December 2018, a CCA Works Initiative was begun to introduce and guide students through the career planning process, with assistance from some of the largest employers in Pennsylvania. One of its Works centers, AgWorks, at the Capital Campus building, is the largest K-12 school-based aquaponic facility in the country. Aquaponics allow the operator to grow fresh, organic produce and raise fish. At CCA, this produce is provided to local restaurants or donated to the Central Pennsylvania Food Bank.

The facility includes fish tanks, grow beds, clarifiers, LED lights, and technology to bring learning alive to students. AgWorks is 100% powered by 1,050 solar panels, located on the roof of the

building. The remaining energy is used to supplement power to the rest of Capital Campus. Students use an online dashboard to learn about energy production and how to reduce energy usage and costs.

Students learn about composting, embryology, and animal husbandry and hatch chickens. AgWorks staff craft lessons, videos (prerecorded or livestreamed), photos, and time-lapse videos for staff who are teaching virtually. A virtual Down on the Farm series included visits to local farms, highlighting the work those farmers were doing during the COVID-19 pandemic. In addition, students have learned about and participated in field trips to wastewater treatment plants and have studied ecosystems, lake ecology, mine impacts, waste management, and alternative energy,

CCA partners with Harrisburg University to have students analyze and report their water usage and carbon footprint, using that information as a key discussion point on how they can reduce their environmental impact. The Harrisburg Family Service Center was able to reduce energy usage by one-third through a grant to install solar panels on the roof with a learning dashboard for students to track energy generation. The mobile aquaponic classroom also has small panels and a dashboard.

Capital Campus strives to reduce water usage and provide additional tie-ins with the grow lab. CCA installed water filling stations to reduce the use of plastic and encourage healthy lifestyle choices. The aquaponics lab uses 90% to 95% less water than a soil-based agricultural system. Students are trained to mitigate food waste, and any unused food or dead leaves are donated to two staff members who feed it to their chickens. CCA does not use pesticides; instead, it implements an IPM approach. Students are researching the installation of a compost system.

A robust wellness program, including reimbursement for gym memberships and continuing education, inspires staff to live a healthier lifestyle. All K-12 students receive a physical education kit with a variety of items to encourage them to stay healthy. A Community Class reimbursement helps to offset the cost of extracurricular community classes, such as sports leagues, karate lessons, swimming lessons, and other fitness classes. Students have access to a Student Assistance Program, which provides support and guidance to students and families. A counseling team offers monthly lessons on a variety of mental health topics. CCA offers an Adventure Club and field trips that include archery, canoeing, white water rafting, zip lining, hiking, snow tubing, ice skating, horseback riding, outdoor rope courses, orienteering, kayaking, stand-up paddleboarding, golfing, fishing, and paintball.

(end quote)

In addition, CCA has been recognized by the PA DEP 2021 Governor's Award for Environmental Excellence, for the same items listed above, even though the governor has yet to visit the Harrisburg facility. The PA DEP honored only 13 projects across the state including schools, businesses and community organizations. CCA was one of 13.

I strongly oppose a new set of regulations to charters that are more stringent than those of school districts. Every child and parent in Pennsylvania deserves the right to choose the public education option best for them. It is clear anti-charter special interest groups are driving this proposed regulation. Our children deserve better. Finally, I urge you to let the funding follow

each student fully as each student should be funded equally, regardless of the school they choose, without red tape or delay.

Thank you for your time.

Erica Spadaccino