



Independent Insurance Agents of Pennsylvania, Inc.

ORIGINAL: 2253

March 4, 2002

TO: Peter Garland
State Board of Education

FR: Tim Wonder
Executive Vice President

RE: State Board of Education Academic Standards

RECEIVED

MAR 6 2002

PA. STATE BOARD
OF EDUCATION

The Independent Insurance Agents of Pennsylvania (IIAP) would like to go on record as opposing the State Standards as proposed by the State Board of Education.

While it is obvious that the drafters of this standard put a great deal of work into its preparation, it is also apparent that the State Board of Education missed something that IIAP believes is crucial for young people to achieve during their high school career.

The standards omit any reference to a basic understanding of insurance concepts. To young people (and to society as a whole) knowing something about insurance is crucial.

In high school, students will immediately identify with the need to understand how auto insurance works. After high school, they will need a working knowledge of renter's insurance, health insurance, homeowners' insurance, life insurance, and other types of insurance should they run a business, utilize pensions/financial planning in a variety of forms, and eventually examine long-term care insurance. Knowing basic insurance concepts is a life-long tool.

Knowing how insurance works and that it is able to pay claims because people pool their premium dollars is basic. Understanding that there is no free lunch i.e. that there is a correlation between claims paid out and how much in premium must be generated is important. Knowing that insurance fraud (inflating claims etc.) makes everyone pay more is important.

The State Board of Education must have wrestled with the question of how detailed to get in drafting the standards. Being too general means that there will be differing interpretations as to what the standards mean. Being too specific means a document that could be too unwieldy. Understanding this does not take away from the fact that these standards are a blueprint on what must be taught in the schools. By not including a basic knowledge of insurance means that the State Board of Education does not consider it important for students to know about as part of their ability to manage their finances.

Obviously, we disagree and ask the State Board of Education to amend its proposed Standards.

CC: Hon. Jess Stairs Hon. James Rhoades
Hon. Nick Colafella Hon. Allyson Schwartz

800 Corporate Circle • Suite 201 • Harrisburg, PA 17110

PHONE: (717) 236-4427

FAX: (717) 236-6697

www.iiap.com

ORIGINAL: 2253



Commonwealth of Pennsylvania
STATE BOARD OF EDUCATION

March 18, 2002

RECEIVED
2002 MAR 19 AM 11:32
INDEPENDENT REGULATORY REVIEW COMMISSION

Ms. Karen Y. Christie
507 Deubler Road
Camp Hill, PA 17011

Dear Ms. Christie:

Thank you for your letter dated March 17, 2002 on proposed 22 Pa. Code, Chapter 4, Appendix C and D (academic standards).

Your letter is considered as official public comment and is being shared with all members of the Board. Pursuant to the provisions of the Regulatory Review Act, copies of your comments are also being provided to the Independent Regulatory Review Commission (IRRC) and the Chairpersons of the House and Senate Education Committees.

Be assured that your comments will be considered carefully in the development of the final-form of these regulations.

The Regulatory Review Act provides that information on the final-form of regulations be mailed to public commentators at their request. If you would like to receive the final-form of these academic standards when they are submitted to the Education Committees and IRRC, please make your request to me in writing at the address printed below.

Sincerely yours,

A handwritten signature in cursive script that reads "Nanette M. Kimmel".

Nanette M. Kimmel
Interim Executive Director

cc: Members of the State Board
Senator Rhoades
Senator Schwartz
Representative Stairs
Representative Colafella
IRRC

507 Deubler Rd
Camp Hill, PA 17011
717-761-0702 (day)
March 17, 2002

Dr. Peter Garland
Executive Director
State Board of Education
333 Market St
Harrisburg, PA 17126-0333

Dear Dr. Garland

Please accept this public comment on the proposed amendments to 22 PA Code Chapter 4 relating to academic standards in arts and humanities; health, safety and physical education; family and consumer science; civics and government; economics; geography; and history as published in the February 16, 2002 PA Bulletin.

My comments are general in nature and apply to all of the proposed new standards from the perspective of a local school board director. They pertain to 1) financial hardship to communities, 2) loss of local board control, 3) less time in the classroom for educational basics, 4) availability of educational resources, 5) assessments, and 6) review. I leave the detailed academics to comment by education professionals.

These added standards **create a financial hardship on local communities**. The Cost and Paperwork Estimates state that total funds available to assist districts with curriculum re-alignment and professional development is \$1647.00 per district (\$825,000 / 501) per year. \$1647 does not nearly cover the hundreds of hours per district involved in this task, nor the hours of staff development. This mandate comes to public school districts already buckling down for impossible budgets due to higher pension & health care costs and low revenues. Many districts have already reported to their communities that educational programs may be cut to avoid high tax increases.

These added standards **discourage local school board control** of curriculum and allocation of resources to best meet the needs of their school's population.

The educational basics are suffering. As our local board plans strategically to best educate our student population, several things constantly rise to the top of the priority list - reading and math. Every year we receive more requests for reading clinics and math clinics to educate those children not identified as special education. And the requests come from higher grades each year. Our teachers tell us that so many other curriculum mandates have been added to their teaching day that basic education suffers. In other words, **so much to teach with so little time to teach it.**

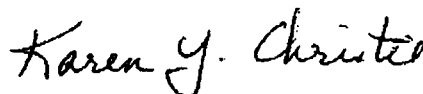
Are textbooks written to these standards? Must districts purchase new textbooks for the new curricula? If the resources are available, is there funding assistance for districts?

Will standardized assessment tests be modified? These test scores are being used to evaluate a student's level of proficiency in addition to their use to evaluate a district's leadership. **If curriculum is changed, the assessment instrument should be changed.**

The Sunset Date for these standards provides for a review of "effectiveness" after four years. Please remember that the potential of four years of ineffective regulations is four years of a child's education. **I suggest that a review process be determined now and put into place upon implementation of these new standards.** Intermediate units host monthly superintendent meetings, and an annual review – say in March 2003 – could be done through communication with these groups. This evaluation should be communicated to the State Board of Education, the Secretary of Education, the IRRC and the legislature.

Thank you for the opportunity to submit comment. With communication in mind, please note that copies are being forwarded to the local legislators representing the areas within my local district.

Sincerely,



Karen Y. Christie

Cc: Sen Harold Mowery
Rep Pat Vance
Rep Jerry Nailor



PENNSYLVANIA ASSOCIATION FOR SAFETY EDUCATION, INC.

Organized 1949



Incorporated 1966

ORIGINAL: 2253

Vince Phillips, PASE Lobbyist
Phillips Associates
3610 Kent Drive
Mechanicsburg, PA 17055

717-728-1217
Fax: 717-728-1164

March 11, 2002

To: INDEPENDENT REGULATORY REVIEW COMMISSION

Enclosed is a letter sent to the State Board of Education asking for amendment of the Proposed Standard for Health, Safety, and Physical Education.

Specifically, PA Association for Safety Education opposes the Standard because it omits what our members feel is a critical life skill, learning the correct way to drive. While experience certainly helps a young driver learn on the road, it does not give the individual the needed framework as to the CORRECT way to drive. Learning informally from others sometimes means learning others' bad driving habits. Teaching teenagers the correct way to drive is a function that professional teachers and instructors can and are doing. As such, it is a task falling within the purview of our educational system.

We respectfully ask that IRRC reject this Standard unless there is a reference to learning the fundamentals of driving safely in Standard 10.3 Safety and Injury Protection.

Thank you for appreciating our concern.

Sincerely,

Vince Phillips
PASE Lobbyist



PENNSYLVANIA ASSOCIATION FOR SAFETY EDUCATION, INC.

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Mechanicsburg, PA 17055

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Fax: 717-728-1164

March 11, 2002

Mr. Peter Garland
Executive Director
PA State Board of Education
333 Market Street
Harrisburg, PA 17101

Dear Mr. Garland:

RE: Academic Standard for Health, Safety, and Physical Education

On behalf of the PA Association for Safety Education, I am writing to oppose the Academic Standard for Health, Safety, and Physical Education. As you know, the PA Association for Safety Education (PASE) has testified before the State Board of Education and submitted written testimony as far back as March 2001. In addition, our member Driver Education instructors testified at the Board's regional hearings on the State Standards.

Our position was and is that students need to receive formal training in driving an automobile from a certified instructor. To Driver Education teachers, this is a safety imperative. When young people drive, they are handling a multi-ton piece mobile piece of steel, capable of inflicting great harm on drivers, passengers, and innocent bystanders alike. The outcome from flawed driving is death, physical disability, or the emotional trauma that comes from knowing that you have hurt others, are all matters involving safety.

Unfortunately, the State Board of Education has not yet seen fit to include this necessary life skill in its proposed Standard. This sends a message to School Districts that Driver Education is unimportant. This negates the professionalism of hundreds of Driver Education teachers who know that driving experience is not always the best teacher. If kids are not trained on the proper way to drive, only learning from a well-intentioned parent or guardian who is a poor driver, their outcome is to be a bad driver too.

Indeed, the only reference to vehicles at all is that 12th graders need to "assess the personal and legal consequences of unsafe practices in the home, school, or community: loss of personal freedom, personal injury, loss of income, impact on others, and *loss of motor vehicle operator's license.*" (10.3 Safety and Injury Prevention)

Since automobiles are a necessary component in today's society, students should understand basic driving skills and to understand the impact on themselves and others if they drive in an unsafe way.

PASE COMMENTS ON ACADEMIC STANDARDS FOR HEALTH, SAFETY, AND
PHYSICAL EDUCATION

March 11, 2002

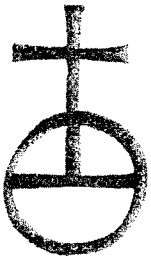
Page Two

We once again request that the Standard be amended to include the importance of being trained in Driver Education. We ask that the Standard be rejected by IRRC and the General Assembly if it does not include this life-saving element.

Sincerely,

Vince Phillips
PASE Lobbyist

CC: IRRC; Chairmen and Minority Chairmen of the Senate and House Education Committees



PENNSYLVANIA CATHOLIC CONFERENCE

223 North Street • Box 2835 • Harrisburg, PA 17105 • (717) 238-9613 • FAX (717) 238-1473

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MAR 18 2002

March 15, 2002

Via Fax and First-Class Mail

**PA. STATE BOARD
OF EDUCATION**

Ms. Nanette Kimmel
Executive Director, State Board of Education
333 Market Street
Harrisburg, PA 17126-7367

Re: Proposed Academic Standards for Health, Safety, and Physical Education

Dear Ms. Kimmel:

I am writing on behalf of the Pennsylvania Catholic Conference to provide the State Board of Education with our comments concerning the Proposed Academic Standards for Health, Safety, and Physical Education. We are grateful for this opportunity to present our views on this important subject.

The topic of health and safety, in particular with regard to human sexuality, is a controversial subject in our society. The PCC has always been a strong supporter of the rights of parents as the primary educators of their children. In the area of human sexuality the PCC is particularly concerned that all parents, Catholic and non-Catholic, be involved in their children's education.

Several of the Proposed Academic Standards for Health, Safety, and Physical Education, while written in a facially value-neutral manner, could be the subject of intense controversy depending upon how those subjects are approached in the classroom. For instance, Standard 10.1.6 B requires that sixth grade students are taught to identify and describe the structure and function of the reproductive system and Standard 10.1.6 E requires students to learn about sexually transmitted diseases. Some parents might object to such topics being taught at that grade level. Further, many parents might be opposed to such a topic being taught in a mixed group of boys and girls because it would be immodest.

The State Board and the local school districts should be careful to assure that parents be informed *prior* to such instruction and provide parents the option of such instruction taking place at home, rather than in a classroom. Further, parents should be provided with an opportunity to view the materials that will be

used for instruction and be informed as to how such material will be presented to their children.

The standards in this area for ninth grade do require that students be instructed regarding abstinence, but the standards do not state with specificity how that subject is to be approached. (10.1.9. A) If education on sexually transmitted disease is to begin in sixth grade, why do the standards wait until ninth grade to begin instruction on abstinence? Moreover, the standards should state explicitly that students be taught that abstinence is the only certain way to avoid all sexually transmitted diseases. Recent scientific studies have shown that some sexually transmitted diseases can be contracted regardless of any type of "protection" being used. These studies have also shown that even when such "protection" does provide a greater margin of safety, for instance in protection from AIDS/HIV, the consequences of contracting those diseases is so devastating and the potential risk still so high, that only complete abstinence makes sense as a matter of public health policy.

We are aware that some organizations advocate that public education should be "value-neutral." We consider that a strange notion because it does not recognize the fact that to be value-neutral is to have taken the position that the highest *value* is to have no values, which is not a value-neutral judgement in itself. The State Board of Education should not flinch from the duty to teach children the fundamental values that have been recognized as important for societies throughout the ages. One such area is the topic of marriage.

The standards touch on the topic of "relationships," including "marriage" and "divorce." (10.1.12. A). We maintain that the standards should be written to state explicitly that students should be taught the importance of marriage as an institution that contributes to human happiness and well being and the stability of society. Students should also be taught that divorce oftentimes involves great emotional pain and a deep sense of loss, particularly for children. This anguish often leads to behavior that is a detrimental to both the individuals involved and society as a whole. Many social science studies have shown this to be true. But even if they had not, who could oppose teaching children that the decision to marry and have children is of monumental importance and that such a decision should be made only after careful consideration. This has been the consistent teaching of all the major faiths of the Commonwealth, and indeed the world, throughout all of the history of civilization. Recently, President Bush has proposed, as a matter of public policy, that the federal government should

Ms. Kimmel
March 15, 2002
Page 3

encourage and support stable marriages as the best circumstance for the raising of children.

PCC is grateful for the hard work done by the State Board of Education on behalf of all children in public schools. We hope these comments will assist you in your important work. If the Board should require further analysis or comment, please do not hesitate to contact us.

Very truly yours,

A handwritten signature in black ink, appearing to read "Fredrick Cabell, Jr." with a stylized flourish at the end.

Fredrick Cabell, Jr. Esq., Director
Education Department

cc: Education Department
Philip J. Murren, Esq.

FC/tlb




Independent Insurance Agents of Pennsylvania, Inc.

ORIGINAL : 2253

March 6, 2002

TO: INDEPENDENT REGULATORY REVIEW COMMISSION

FR: Tim Wonder 
Executive Vice President

RE: Chapter 4. Academic Standards for Assessment

Enclosed please find a copy of our comments to the State Board of Education. We feel the Board has erred in not including a component on basic insurance education in formulating the Standards.

Thank you for your review of our views.



Independent Insurance Agents of Pennsylvania, Inc.

2002-03-17 17:17

STATE BOARD OF EDUCATION

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