

# WEST SHORE SCHOOL DISTRICT



2928

Ms. Michelle L. Elliott  
Regulatory Analyst  
Independent Regulatory Review Commission  
333 Market Street, 14th Floor  
Harrisburg, PA 17101

Jerry L. Small, Ed.D.  
Superintendent of Schools

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Dear Ms. Elliott:

This letter is written to you regarding the State Board of Education's Safe Schools proposed regulation #6-325 (IRRC#2928). On behalf of the administrative team of the West Shore School District as well as those from neighboring districts, we ask that the Independent Regulatory Review Commission (IRRC) reject this proposal. This request is based on the following:

Items required to be submitted annually (i.e. yearbooks) are often outdated when printed and of little or no value in an actual emergency months after printing. This regulation does not appear to allow the use of information maintained in a digital format which is more current than any printed document as well as being a more fiscally responsible approach to sharing information. The staff time spent in providing, maintaining and updating these documents takes time away from other safety related tasks.

While certainly well-intentioned, providing documents to all fire departments (in West Shore School District's case that would be eight) presents a concern in terms of maintaining operational security in an emergency situation. More importantly, for any school district to comply with this requirement would also put them in violation of student privacy rights as outlined in the Family Educational Rights and Privacy Act (FERPA).

Perhaps most disconcerting is that, to my knowledge, these proposed regulations were developed without discussion with stakeholders at the local level, i.e. school officials, municipal police and other first responders.

Those that would actually need to have access to the information must have a voice as to what is the most relevant and most effect way to share it in the event of an emergency.

Thank you for your consideration of my comments.

Sincerely yours,

Thomas C. Burnheimer  
Director of Pupil Services