



## ED, CharterRegs

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**From:** Jeffrey Coyne <jcoyne@aftpa.org>  
**Sent:** Monday, October 18, 2021 1:36 PM  
**To:** ED, CharterRegs  
**Subject:** [External] AFT Pennsylvania's Comments on PDE's Proposed Rules relating to charter schools and cyber charter schools  
**Attachments:** Proposed Charter School Rules AFTPA Response.pdf

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To Whom it May Concern:

On behalf of our 36,000 Members throughout the Commonwealth, I have been asked to forward our joint comments from AFT Pennsylvania State President, Arthur Steinberg; Philadelphia Federation of Teachers President, Jerry Jordan; and Pittsburgh Federation of Teachers President, Nina Esposito-Visgitis. If you have any questions or concerns please do not hesitate to contact me. We appreciate your consideration of our position. Thank you!

Sincerely,

Jeff Coyne



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PHILADELPHIA  
FEDERATION of TEACHERS



October 18, 2021

Division of Charter Schools  
Department of Education  
333 Market Street  
Harrisburg, PA 17126

To Whom it May Concern:

AFT Pennsylvania and our affiliates have reviewed the PA Department of Education's (PDE) proposal to add Chapter 713 (regulations relating to charter schools and cyber charter schools) to Title 22 and we would like to comment on certain aspects. In PDE's proposed regulations they have six areas of Pennsylvania's Charter School law that they are trying to clarify. Of those areas, AFT Pennsylvania would like to comment on three of them.

The aspect we strongly support is the Boards of Trustees ethics standards. AFT Pennsylvania endorses the rule that holds Charter Schools to the same standards that Boards for our traditional school districts must follow. The rules acknowledge that board members are public officials and govern how they must operate. Removing the potential for conflicts of interest, whether financial or nepotistic, is necessary to build trust that these board members are good stewards of taxpayer dollars.

The second aspect that we would like to comment on is the Fiscal and Auditing Standards rules. AFT Pennsylvania supports the creation of the same fiscal and auditing standards that can bring transparency so taxpayers, school districts and PDE know specifically how tax dollars are being used in these schools. This fiscal and auditing uniformity creates the same level that charter schools and traditional schools can be judged on.

The third and last aspect we would like to comment on is the Charter school employee health care benefits parity. AFT Pennsylvania opposes this rule written by the Department. We compared PDE's interpretation to the current law and concluded that this recommendation significantly alters the statute as written. The legislation specifically states: "Every employee of a charter school shall be provided the same health care benefits as the employee would be provided if he or she were an employee of the local district." This change relieves charter schools of that responsibility.

We appreciate the ability to comment on these proposed rules and hope that the Department considers our position in this matter.

Sincerely,

Arthur G. Steinberg  
President  
AFT Pennsylvania

Jerry T. Jordan  
President  
Philadelphia Federation of Teachers

Nina Esposito-Visgitis  
President  
Pittsburgh Federation of Teachers