



ED, CharterRegs

From: Teddi Sedlar <teddi.sedlar@gmail.com>
Sent: Saturday, October 16, 2021 10:54 AM
To: ED, CharterRegs
Subject: [External] Opposition to regulation 6-349

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Dear Pennsylvania Department of Education,

I attended my first school up through the fourth grade. I was not a straight A student; several times I got in trouble for the misbehavior I engaged in to ease my boredom. The school administration made no move to help me, in fact, I was often reprimanded in kindergarten and first grade because I would go ahead in my schoolbooks and complete whatever seemed interesting. Furthermore, I was regularly bullied for several years, and the behavior of my bullies was not stopped by school administration or teachers. In the fourth grade, I changed from one school to another and instantly realized how much I could accomplish in a different environment. With different teachers who did not already have preconceived notions about me, and new classmates who did not bully or exclude me, I started to thrive, so much that I was quickly brought into the gifted program, which offered opportunities my previous school did not. The teachers at my new school were supportive of my advanced work, so much so that I eventually skipped the seventh grade. At my first school, I thought I was not particularly smart, and had a general distaste for learning- but at the new school, I thrived. It is amazing what a chance to change environments to one better suiting a student can do, especially when a student needs distance from people who bullied them and caused anxiety to truly make a fresh start. And now, the charter schools that give students a chance to restart the way I did are being undermined by regulation 6-349.

The provisions of this regulation are a gross overstepping of the powers of unelected officials that circumvents the legislative process in order to subvert charter schools. Charter schools are not simply options that those with institutional power are being forced tolerate by the uneducated masses (as some supporters of these provisions have implied): they are a necessary recourse for parents who have been failed by the "authorities" associated with their school districts. When local district administration fails a student, whether by not providing special education to match the student's needs, not providing programs that will aid the student in their career, or by creating an environment that is not conducive to that student's learning, that student must be able to move to another school environment. My own sisters moved from a public school to cyber charter school when the public school was not able to provide them with a consistent learning environment during the pandemic- the district would not provide them with a consistent education, but the charter could. If school districts wish to prevent students from turning to alternative learning environments, there is a very simple way to do so; the district schools can improve the job they are doing.

A number of specific portions of the proposed regulations directly subvert the ability of parents and students to remove themselves from districts that are already failing students. For example, increasing administrative costs of charter schools directly impacts the ability of the charter school to provide for students. For example, Pg 13 of the regulations describe how requiring more auditing from charter schools will "increase business opportunities for Pennsylvania's approximately 40 auditing and CPA firms". The regulation literally states that, if implemented, these regulations will cause approximately \$20,000 to \$30,000 dollars per charter school that does not receive \$750,000 of federal funding a year. Let me reiterate: the regulations as written not only imply but to demand federal money be redirected from attending to students needs, to propping up separate third party businesses with these tax payer dollars. The regulations as written have the potential to send taxpayer dollars, already designated to go to the education of our children, to third parties. This represents an enormous breach of the trust of the populace, that the money we designate via our elected officials to go to specific causes voted on by the legislature. And beyond all of that, page 15 addresses the expected cost savings of these changes to the PDE. \$52,500. The PDE is forcing small charter schools to pay

between twenty and thirty thousand taxpayer dollars annually, to save less than the cost of three schools receiving an audit. So rather than the PDE doing its job and redirecting funds as the law demands to ensure school districts do not defraud charter schools, they are forcing even more taxpayer money to go to private third party entities.

Furthermore, the regulations are not internally consistent about the purpose of charter schools. While page 2 states that "charter schools will serve as laboratories of innovation", implying that charter school environments may experiment with unique methods, and thereby may discover learning strategies that would benefit the state as a whole. However, on page 14, the regulations state that there is "a lack of attention to equity, and no guarantee of innovation or excellence". If charter schools are laboratories of innovation, then the expectation is that they will generate new ideas that may propel them ahead of other schools. However, if they are meant to be equitable, then they are meant to ensure their students end up in the same educational position as those who attend public schools. So which are they expected to do? Are charter schools expected to take educated risks, which may advance their students beyond the state standard, or are they expected to make sure their students stick to the status quo? Charter schools cannot be laboratories of innovation and standard schools at the same time, and yet this legislation punishes them for not being both.

These are only some of the problems and contradictions found in the proposed regulations: other public comments have already addressed a myriad of issues I have not addressed. The end result is the same: charter schools, which are meant to be bastions of creativity and innovation, are being financially stifled by the PDE for the simple crime of not being a public school district. But the entire reason parents are willing to send their kids to charter schools, despite the difficulties some parents face in getting their children to those schools, is because those schools are not public school districts. Just as the reason I changed schools in the fourth grade, was specifically to get away from a school environment that was detrimental to me emotionally and intellectually. The option of changing schools literally changed my life, and any regulations designed to take those chances from other students or undermine the institutions that provide these students refuge must be most vocally and stringently opposed.

Sincerely,
Teddi Sedlar
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