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IN THE COMMONWEALTH COURT OF PENNSYLVANIA

PENNSYLVANIA SCHOOL BOARDS ASSOCIATION, INC., SCHOOL DISTRICT OF PITTSBURGH, CENTRAL BUCKS SCHOOL DISTRICT, and UPPER DARBY SCHOOL DISTRICT, Petitioners, v. DR. KHALID N. MUMIN, SECRETARY OF EDUCATION OF THE PENNSYLVANIA DEPARTMENT OF EDUCATION, and the PENNSYLVANIA DEPARTMENT OF EDUCATION, Respondents.	:	No.: 409 M.D. 2023

PETITIONERS' SURREPLY BRIEF

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I. COUNTER STATEMENT OF QUESTIONS INVOLVED

A. Are the exhibits that have been filed by the School Districts with their Application for Summary Relief properly before the Court?

Suggested Answer: Yes.

B. Do Section 1301 of the School Code, 24 P.S. § 13-1301, and 22 Pa. Code § 11.12 apply to all students, including students with disabilities?

Suggested Answer: Yes.

II. COUNTER STATEMENT OF THE CASE

Pending for disposition are cross-motions for summary judgment by the parties. In accordance with scheduling orders issued by the Court on November 14, 2023, and November 30, 2023, the parties filed their respective main briefs supporting their respective applications for summary judgment on December 29, 2023, and Reply Briefs on January 5, 2024. The Reply Brief filed by the Respondents, the Pennsylvania Department of Education and the Secretary of Education (individually or together referred to as "PDE"), contained two arguments not previously raised or addressed.[1] In accordance with Pa. R.A.P. 2113(a), the Petitioners Pennsylvania School Boards Association ("PSBA"), School District of Pittsburgh ("Pittsburgh"), Central Bucks School District ("Central Bucks") and

[1] PDE's Reply Brief contained three arguments, but the second argument was previously addressed by the School Districts and needs no further elaboration herein.

Upper Darby School District ("Upper Darby") (together referred to as the "School Districts"), file this Surreply Brief.

III. SUMMARY OF THE ARGUMENT

The exhibits filed by the School Districts with their Application for Summary Relief are properly before the Court in accordance with Pa. R.C.P. 1035.1 through 1035.5. Among the exhibits is a stipulation of facts executed by counsel for the Petitioners and the Respondents. The Stipulation, Exhibit P-63, in addition to setting forth many facts, authenticates many other exhibits. The declarations and affidavits filed all comply with and contain the statements required by Pa. R.C.P. 76.

Section 1301 of the School Code, 24 P.S. § 1301 ("Section 1301"), and 22 Pa. Code § 11.12 apply to all students, including students with disabilities. Indeed, Section 1301 begins with the phrases that "[e]very child" is entitled to attend school who is within the age range set forth in that section. Chapter 11 of the State Board regulations, 22 Pa. Code, Chapter 11, which includes 22 Pa. Code § 11.12, is a broad-based compilation of regulations that apply to all students, not just students who are not disabled. The PARC Consent Decree, which specifically addresses the rights of disabled students, expressly requires compliance with Section 1301 of the School Code. *See Pennsylvania Ass'n for Retarded Children v. Pennsylvania,* 343 F. Supp. 279, 309 (E.D. Pa. 1972).

PDE has not filed an Answer to the Petition for Review and has not presented any evidence to dispute any of the material facts presented by the School Districts in this case.

IV. STANDARD FOR SUMMARY JUDGMENT

A motion for summary judgment may be granted only where there is no genuine issue of material fact, and the moving party is entitled to judgment as a matter of law. *Flood v. Silfies*, 933 A.2d 1072, 1074 (Pa. Commw. Ct. 2007). A fact is material if it directly affects the disposition or the outcome of a case. *Department of Environmental Protection v. Delta Chemicals, Inc*., 721 A.2d 411, 416 (Pa. Commw. Ct. 1998). The right to judgment must be clear and free from doubt.

V. ARGUMENT

A. THE EXHIBITS THAT HAVE BEEN FILED BY THE SCHOOL DISTRICTS WITH THEIR APPLICATION FOR SUMMARY RELIEF ARE PROPERLY BEFORE THE COURT.

Beginning on page 8 of its Reply Brief, PDE argues that "the vast majority of the documents" submitted by the School Districts are not permitted by Pa. R.C.P. 1035(a). In support, PDE cites the Superior Court's decisions in *Irrera v. Southeastern Pennsylvania Transp. Authority*, 331 A.2d 705, 707 (Pa. Super. Ct. 1974), and *Wheeler v. Johns-Manville Corp*., 493 A.2d 120 (Pa. Super. Ct. 1985). PDE's argument has no merit for several reasons.

Pa. R.C.P. 1035, upon which PDE's argument is based (and upon which the Court's decisions in *Irrera* and *Wheeler* are based) was rescinded in 1996. It has been replaced by Pa. R.C.P. 1035.1 through 1035.5. Pa. R.C.P. 1035.1 provides:

> As used in Rule 1035.1 et seq., "record" includes any
> (1) pleadings,
> (2) depositions, answers to interrogatories, admissions and affidavits, and
> (3) reports signed by an expert witness that would, if filed, comply with Rule 4003.5(a)(1), whether or not the reports have been produced in response to interrogatories.

Pa. R.C.P. 1035.1.

As discussed hereinafter, each of the documents in the record relied upon by the School Districts were filed in compliance with Pa. R.C.P. 1035.1.

Not only does PDE rely upon a rule that has been rescinded, but it does not specifically identify any particular exhibits that it claims should be ignored by the Court. Instead, on pages 10 and 11 of its Reply Brief, PDE makes general statements about emails and declarations without identifying any particular email, declaration, or other document. Against this background, we will address the Exhibits that were filed by the School Districts with its Application for Summary Relief.

It is appropriate to begin our discussion with Exhibit P-63 which are Stipulations agreed upon by PDE and filed in this case by the parties.[2] In Exhibit P-

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[2] The Stipulations were originally filed by the parties and entered into the docket on November 10, 2023. The Stipulations were subsequently included in the School

63, ¶ 1, the parties agreed to the "truthfulness" of the facts stated and agreed that the Court may accept "said facts as true without further proof of same."[3] Your Honorable Court long ago recognized that "[a]n agreed statement of facts can be the basis for summary judgment. It can be treated as an admission on file." *Farnell v. Winterloch Corp*., 106 Pa. Commw. 542, 549, 527 A.2d 204 (Pa. Commw. Ct. 1987) (citing *Donegal Mutual Insurance Co. v. Transamerica Insurance Co*., 62 Pa. D. & C. 2d 374 (1973)). Courts accept stipulations as "judicial admissions." *See, e.g., Bartholomew v. State Ethics Comm'n*, 795 A.2d 1073 (Pa. Commw. Ct. 2002); *Fierst v. Commonwealth Land Title Ins. Co*., 369 Pa. Super. 355, 361, 535 A.2d 196 (Pa. Super. Ct. 1986) ("Parties are bound by their stipulations made in judicial proceedings.); *Camper v. Werner*, 2023 Pa. Super. Unpub. LEXIS 517, *18, 296 A.3d 574, 2023 WL 2337523 (Pa. Super. Ct. 2023) ("Statements of fact by one party in pleadings, stipulations, testimony, and the like, made for that party's benefit, are termed judicial admissions and are binding on the party."). As "admissions" are

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Districts' Application for Summary Relief and marked Exhibit P-63, filed on November 28, 2023.

[3] The Stipulations also contained certain limitations, such as stating that the parties were not agreeing upon relevancy or waiving hearsay objections. Because PDE has chosen not to provide any argument specifically discussing any shortcoming of any of the agreed upon facts, the School Districts will not evaluate any of the stipulated facts for relevancy or hearsay issues either.

specifically allowed to support an application for summary judgment under Pa. R.C.P. 1035.1(2), the stipulation filed and marked as P-63 is properly before the Court, and PDE does not argue otherwise. Instead, PDE ignores the Stipulations and the facts that it agreed upon in the Stipulations.

As stated earlier, PDE argues that the emails that have been filed with the School Districts' Application for Summary Relief are not properly before the Court. However, the emails were identified and are part of the Stipulations as "authentic copies." They are, therefore, properly before the Court. However, the School Districts will concede that although the emails were identified, marked, and stipulated to at early stages of the litigation before the issues became framed for purposes of Summary Judgment, the emails were not relied upon by the School Districts in support of any of its arguments in either its main Brief or its Reply Brief.

As it did with the emails, PDE makes generalized objections to declarations filed by the School Districts without identifying any particular declaration or affidavit. *See* PDE's Reply Brief, p.p. 9-11. On page 10 of its Reply Brief, PDE asserts:

> Petitioners attempt to include several "declarations" that are not sworn affidavits also fails, as they are synonymous with the unsworn "verifications" that the Pennsylvania Supreme Court held are not valid under Pa. R.C.P. 1035. Id. [*sic*]

As stated previously, Pa. R.C.P. 1035 has been rescinded. PDE ignores the current iteration of the rules. More specifically, Pa. R.C.P. 76, defines the term

"affidavit" for purposes of the Rules of Civil Procedure, including Pa. R.C.P. 1035.1, as follows:

> "affidavit," ***a statement in writing of a fact or facts, signed by the person making it,*** that either (1) is sworn to or affirmed before an officer authorized by law to administer oaths, or before a particular officer or individual designated by law as one before whom it may be taken, and officially certified to in the case of an officer under seal of office, or (2) is unsworn and ***contains a statement that it is made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities***;

Pa. R.C.P. 76 (emphasis added).

Each of the declarations and affidavits filed in this case meets the standards contained in Pa. R.C.P. 76. *See* Exhibits P-33 (Klein Affidavit); P-37 (Mains Affidavit); P-60 (Marton Declaration); P-61 (Faust Affidavit); P-62 (Camper Declaration); P-64 (Marshaleck Affidavit). Each and every one is a "statement in writing of a fact or facts," each is signed by the person making it, and each contains a statement that it is made subject to the penalties of 18 Pa. C.S. § 4904. In short, they were prepared and filed in accordance with the applicable rules. PDE does not refer to any individual affidavit or declaration specifically and does not explain how any individual affidavit or declaration is deficient.

In the closing paragraph of its argument, PDE makes the assertion that: "Indeed, the inclusion of such documents only raise additional facts and demonstrate that the facts upon which Petitioner seeks to proceed remain disputed." PDE Reply Brief, p. 11. PDE does not identify anywhere in either its main brief filed on

December 29, 2023, or its Reply Brief filed on January 5, 2024, what facts are disputed. In addition, at the summary judgment stage, a fact can be established as being disputed only with evidence—not a conclusory statement in a brief. A party "must present depositions, affidavits, or other acceptable documents that show there is a factual issue for a jury's consideration." *DeWeese v. Anchor Hocking Consumer & Indus. Prods. Group*, 427 Pa. Super. 47, 53, 628 A.2d 421 (Pa. Super. Ct. 1993) (citing *Brecher v. Cutler*, 396 Pa. Super. 211, 578 A.2d 481 (Pa. Super. Ct. 1990)).

In this case, PDE has not filed an Answer to the Petition for Review,[4] thereby admitting the factual averments in the Petition for Review. Pa. R.C.P. 1029 plainly states:

> Averments in a pleading to which a responsive pleading is required are admitted when not denied specifically or by necessary implication. A general denial or a demand for proof, except as provided by subdivisions (c) and (e) of this rule, shall have the effect of an admission.

Pa. R.C.P. 1029(b).

In addition to not answering the Petition for Review, PDE has not filed any evidence—no documents, no affidavits, no expert reports—nothing.

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[4] PDE filed Preliminary Objections on September 29, 2023 but withdrew the Preliminary Objections on November 28, 2023. Despite PDE's withdrawal of its Preliminary Objections, no Answer and no New Matter were ever filed by PDE.

In light of the foregoing, it is submitted that PDE's argument that the affidavits and evidence filed in this matter by the School Districts should be disregarded has no merit.

B. SECTION 1301 OF THE SCHOOL CODE, 24 P.S. § 13-1301, AND 22 PA. CODE § 11.12 APPLY TO ALL STUDENTS, INCLUDING STUDENTS WITH DISABILITIES.

Beginning on page 17 of its Reply Brief, PDE makes the argument that Section 1301 and 22 Pa. Code § 11.12 do not conflict with the new age-out rule mandated by PDE. On page 18 of its Reply Brief, PDE asserts, "neither 24 P.S. § 13-1301 nor 22 Pa. Code § 11.12 speak specifically to the education of eligible students under IDEA or Chapter 14 and, therefore, do not conflict with the Model Policy." It is submitted that PDE's assertions have no merit.

The assertion that Section 1301 does not apply to students with disabilities under IDEA is frivolous. Section 1301 applies, by its express terms, to "[e]very child." 24 P.S. § 13-1301. The first two words of the Section make it clear that it applies to all children, those who have disabilities and those who do not. Similarly, Chapter 11 of the State Board regulations apply to all children. There is absolutely nothing in any of the provisions in Chapter 11 of the State Board regulations in general or in Section 11.12, in particular, to suggest that the regulations are applicable only to students without disabilities. Indeed, in the *PARC Consent Decree,* the Court specifically approved and mandated that Section 1301 applies to students

with disabilities (that case deals with students with intellectual disabilities specifically). *See Pennsylvania Ass'n for Retarded Children,* 343 F. Supp. at 309.

Contrasted with Section 1301 and 22 Pa. Code § 11.12, that by their terms apply to all students, are those School Code provisions and regulations that carve out disabled students when the General Assembly or State Board so intends. Both the General Assembly and the State Board of Education have on numerous occasions expressly exempted students with disabilities from, or modified for such students, statutory and regulatory provisions that otherwise would be generally applicable to all students. *See, e.g.*, 24 P.S. §§ 13-1310(b) (related to education in day treatment facilities); 13-1317.2(c) (related to discipline for weapons possession); 13-1318.1(i) (related to treatment of students convicted of sexual assault); 13-1374 (related to mileage limitations for school transportation); 15-1501.8(c)(4) (related to flexible scheduling during the pandemic of 2020); 15-1506(b)(6) (related to flexible instructional days); and 22 Pa. Code §§ 4.24(d) (related to graduation requirements) and 4.28(c) (related to curriculum requirements). If either the General Assembly or the State Board had intended the generally applicable rule established in Sections 1301 and 11.12 not to apply, or to apply with modifications, to students with disabilities, *both* bodies certainly had plenty of knowledge and experience with doing so expressly and unequivocally.

PDE's new mandate is that school districts are required to allow students with disabilities as defined in IDEA to remain enrolled in school districts until their 22nd birthday. In bright contrast, Section 1301 and 22 Pa. Code § 11.12 require school districts to allow students with disabilities to remain enrolled only until the end of the term during which the student turns 21. The difference between PDE's new mandate and existing law cannot be more obvious, but PDE argues that there is no divergence between its new rule and Section 1301.

PDE attempts to buttress its argument by citing Section 1925 of the School Code, which provides as follows:

> Any board of school directors ***may*** admit persons less than six years of age, or more than twenty-one years of age, to suitable ***special or career and technical schools or departments***.

24 P.S. § 19-1925 (emphasis added).

Section 1925 of the School Code has no applicability to this case for several reasons. First, the new age-out rule being mandated by PDE is a mandatory rule, not a discretionary power like the one reflected in Section 1925 of the School Code. If anything, Section 1925 of the School Code makes it clear that school districts do not have a mandatory duty to provide education beyond the dictates contained in Section 1301 or 22 Pa. Code § 11.12. Second, the authorization in Section 1925, contained within Article XIX of the School Code, applies to Extension Education and Special Schools and Classes, not to the general k-12 programs of school districts.

Further, within the context of extension education and special schools and classes, the authorization contained in Section 1925 is limited to "special or career and technical schools or departments." 24 P.S. § 19-1925. The mandate created by PDE is for FAPE, something that is very different than special or career and technical schools or departments regarding extension education.

In its argument, PDE persists in assertions that it has done nothing but set forth its "interpretation" of IDEA in its "Model Policy." In prior briefing, we have set forth arguments on why PDE imposed a mandatory rule and that it did much more than simply adopt a "Model Policy." We will not repeat those arguments here. However, now that the School Districts have PDE's responses and Reply Brief, we can highlight the following undisputed facts that undermine PDE's assertions.

In Alyssa Marton's affidavit, she stated that she attended the PDE training on August 31, 2023, when PDE's Director of Special Education, Carole Clancy, "unequivocally stated that the policy change was mandatory." Exhibit P-61, ¶ 5. In his affidavit, Andrew Faust ("Faust"), stated that "[a]s a result of being told by PDE that the new rule must be followed, school districts across the state have reenrolled hundreds of students who but for the settlement, the Pennlink, the FAQ and the training aged out prior to August 30, 2023." Exhibit P-61, ¶ 55. Patti Camper declared in her affidavit that she "attended a virtual training on August 31, 2023, and PDE (Carole Clancy) clearly communicated that this policy change was mandatory."

Exhibit P-62, ¶ 5. PDE has not offered or filed any evidence to dispute these facts. Why has PDE not filed an affidavit from Carole Clancy denying the assertions? The answer is simple, Carole Clancy, head of special education for PDE, told school districts that they had to comply—that it was mandatory.

In addition to PDE not filing any evidence disputing the aforesaid facts, PDE did not file any evidence disputing other material facts established by the School Districts with evidence in this case. Indeed, not only has PDE not presented any evidence to support the following facts, but it has not presented any arguments regarding the facts established in the Exhibits entered into the record in this case.

Faust and Andrew Klein ("Klein") are both experts regarding special education—and PDE has not contended otherwise. Affidavits and a report were filed by both Faust and Klein. *See* Exhibits P-33, P-42, P-61. In his affidavit, Klein provided significant detail about the practices in Pennsylvania regarding the age-out rule. Exhibit P-33, ¶ 9 *et seq.* Klein began his description of the practices in Pennsylvania by saying, "The practices in Pennsylvania since the IDEA was first enacted effective 1975, almost a half-century ago, have never been to provide FAPE to students until their 22nd birthday." Exhibit P-33, ¶ 9. Klein followed this statement with several paragraphs providing detailed backup to the general statement in ¶ 9. This is significant because PDE does not dispute any of the facts set forth by Klein. Faust provided similar evidence. Exhibit P-61, ¶ 29 *et seq*. Certainly, if there were

any erroneous statements by Klein or Faust regarding the practices in Pennsylvania, PDE would have presented evidence; but it did not.[5]

In addition, both Klein and Faust discussed and provided evidence about the enforcement processes of PDE and the special education due process hearing process. For example, Faust explained:

> 83. There are two primary enforcement methods under IDEA and the practices in the state. (a) First, PDE has oversight and compliance obligations under the IDEA and has staff whose job it is to investigate school district practices under the IDEA. (b) Prior to August 30, 2023, PDE and its compliance staff never required school districts to provide FAPE until a student's 22nd birthday. (c) However, having agreed in the settlement that it will implement the new rule, PDE compliance staff will require school districts to comply with the new rule contained in the settlement and related documents. (d) The second method of enforcing FAPE under state and federal law is by filing a special education due process complaint against school districts. (e) Until August 30, 2023, the commonly accepted understanding by the parents'/students' bar, by the school district bar and by hearing officers was that the age out rule was as stated in Section 1301 of the School Code and 22 Pa. Code. §11.12. (f) It is my opinion that hearing officers will give legal effect and decide cases on the bases of what is stated in the Settlement and related documents. Indeed, the settlement agreement expressly states that students and parents can sue school districts to enforce the settlement agreement. (g) The method for students and parents to sue school districts to enforce the settlement agreement is by filing a special education due process complaint before a due process hearing officer, unless an exception to the exhaustion requirement would apply, in which case, a court action could be filed.

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[5] As the School Districts pointed out in their main brief in support of summary judgment, and will not be repeated herein, the practices in a state pre-empt the general rule in the IDEA. *See* 20 U.S.C. § 1412(a)(1)(B)(i).

Exhibit P-61, ¶ 83.

Klein provided similar factual evidence. Exhibit P-33, ¶'s 20, 21. PDE has not filed any evidence to dispute these opinions as it is permitted to do in Pa. R.C.P. 1035.3. These facts are material because, as the School Districts pointed out in their main brief in support of summary judgment, the practices in a state pre-empt the general rule in the IDEA. 20 U.S.C. § 1412(a)(1)(B)(i).

VI. CONCLUSION

For the foregoing reasons, the School Districts respectfully request that the Court deny PDE's Application for Summary Relief and grant Summary Judgment in favor of the Petitioners and against the Respondents.

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Date: Wednesday, January 10, 2024

CERTIFICATE OF COMPLIANCE

Pursuant to Rule 2135, I certify the following:

This brief complies with the type-volume limitation of Rule 2135, as it contains 3,620 words, excluding the parts of the brief exempted by the Rule.

Dated: Wednesday January 10, 2024

/s/ Michael I. Levin, Esquire
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CERTIFICATE OF SERVICE

I, the undersigned counsel, hereby certify that I served the foregoing Petitioners' Sur-Reply Brief on the following counsel and on the date indicated below in the manner indicated, which service satisfies the requirements of Pa. R.A.P. 121:

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