

29TH DISTRICT  
**JAMES J. RHOADES**

PLEASE REPLY TO:



SENATE P.O. BOX 203029  
THE STATE CAPITOL  
HARRISBURG, PA 17120-3029  
PHONE: (717) 787-2637  
FAX: (717) 783-9149



32 E. CENTRE STREET  
MAHANOEY CITY, PA 17948  
PHONE: (570) 773-0891  
(570) 621-3413  
FAX: (570) 459-3921



**Senate of Pennsylvania**

Original: 2039

Harbison

cc;

Harris

Nanorta

COMMITTEES

Markham

EDUCATION, CHAIRMAN Sandusky

AGING AND YOUTH Legal

APPROPRIATIONS

ENVIRONMENTAL RESOURCES AND ENERGY

TRANSPORTATION Notebook

McGinley

PHEAA BOARD OF DIRECTORS

EDUCATION COMMITTEE OF NCSL

COMMISSIONER, EDUCATION COMMISSION OF THE STATES

SPECIAL COMMITTEE ON INTERSCHOLASTIC ATHLETICS, CHAIRMAN

August 23, 1999

The Honorable Eugene W. Hickok  
Secretary  
Department of Education  
Tenth Floor, 333 Market Street  
Harrisburg, PA 17020

Dear Secretary Hickok:

Please accept the following as comments submitted on behalf of the Senate Education Committee on proposed standard #6-264 as required by section 5(d) of the Regulatory Review Act of 1982 (P.L. 633, No. 181). As this standard is in the proposed phase of the regulatory review process, I wish to provide the Department with a range of comments, observations and suggestions in hopes that they will be taken into consideration as the Department prepares its final rulemaking.

It is clear that the Department, the standing committees, and the institutions currently approved to prepare Pennsylvania's teachers share the goal stated in section 354.2 of the proposed standard: that our teacher candidates should "... master both the content and the teaching methodology of their discipline." These comments are presented in pursuit of this shared mission.

## **I. GENERAL OBSERVATIONS**

This proposed standard attempts to set forth the requirements that institutions must meet in order to be approved by the Department as programs that prepare Pennsylvania's teachers. Generally, these requirements direct institutions that wish to be approved to:

- adopt and implement standards for curriculum design,
- enforce standards for maintaining the academic competence of teacher candidates,
- develop mechanisms to assess candidates' competencies in certain "skill dimensions,"

SEP 23 PM 4:15  
1000  
1000

- establish institution-specific “exit criteria,” and
- ensure that graduates have achieved a level of “professional competency.”

As I will further explain, I believe that this proposed standard presents an opportunity for policy-makers to answer the question that section 354.2 seems to beg: What are the content knowledge and teaching skills that a candidate must master to become a competent teacher? Certainly, we can not set standards for our teacher candidates until we understand fully what a competent teacher should know and be able to do. And although I believe this proposed standard does not clearly identify these competencies, I believe that it represents a beginning.

The substance of these comments will be constructed around my belief that we must establish these kinds of standards for our teacher candidates. While I disagree with some elements of the proposed standard, I suggest that it can be shaped to reflect a system that defines the competencies we expect of our professional educators. Such a system can begin to take shape by creating a closer connection among some of Chapter 354’s key principles. In addition to making specific comments on individual sections of the proposed standard, these comments attempt to address the following concepts:

- The importance of identifying the knowledge and skills a teacher must possess.
- The need to define “academic competence” as the mastery of the identified knowledge and skills, perhaps based on the “skill dimensions” listed in section 354.32.
- The need to correlate “skill dimensions” to the assessments of “academic competence” required by section 354.25.
- The need to relate mastery of “skill dimensions” to the assessment of “professional competency” required in section 354.33.

## **II. CATEGORY 1 – PROGRAM DESIGN**

### **A. Identifying the Knowledge and Skills Teachers Must Possess**

Just as the required elements of an approved teacher preparation program are key to the identification of the knowledge and skills that a teacher candidate should possess, so should the proper identification of knowledge and skills inform the development of approved teacher preparation programs. Certainly, I agree that our teacher candidates should “... master both the content and the teaching methodology of their discipline.” However, I respectfully suggest that more emphasis should be placed on identifying what specific knowledge and skills a teacher candidate should possess when he or she exits an approved program.

1. Standards Identified in 22 PA Code, Chapter 49

The recently-approved revisions to 22 PA Code, Chapter 49, could serve as a summary of the standards that a candidate for teacher certification should meet. These standards list references to both content knowledge and pedagogical skills.

2. Relation of 3.0 GPA to Success in the Classroom

While I do not disagree that the Commonwealth has an interest in setting high standards for prospective teachers, I am not certain that establishing a 3.0 grade point average (GPA) as the Department proposes in several sections of the proposed standard is a benchmark that relates to success in the classroom. To truly identify a standard of excellence for our teacher candidates, we should proceed to the difficult task of identifying the specific content and pedagogical competencies we expect from our teachers.

3. 22 PA Code, Chapter 4 Standards

Certainly, this is not an easy task. However, Pennsylvania has in the past demonstrated that it can accept this difficult challenge. The graduation standards identified for our public school students in 22 PA Code, Chapter 4 articulate what we expect a high school graduate to know and be able to do. I respectfully submit that we should proceed to the identification of the content knowledge and pedagogical skills that teacher candidates must possess to assist public school students as they work to master the Chapter 4 standards. I further suggest that the identification of these standards should be a cooperative enterprise that includes input from teacher preparation programs, teachers, and other academics.

In addition to this general comment, I offer the following observations about specific sections of the proposed standard.

**B. Emphasis on Core Curriculum - Section 354.24.**

I strongly agree with the requirement in section 354.24 that teacher preparation programs should require prospective students to successfully complete six semester hours in college-level mathematics and six semester hours in college-level English composition and literature prior to enrolling. These skills are basic to all instruction and should be mastered by every teacher candidate.

**C. Defining Academic Competence - Section 354.25.**

For reasons identified in section II(A) of my comments, I am concerned that the requirement of section 354.25(a)(3), that a candidate maintain a 3.0 GPA in his or her "academic discipline," is not a true indication of the mastery of the content and the teaching methodology needed to succeed as a teacher in a given discipline.

1. Assessments – Section 354.25(a)

If the Department elects to move toward the identification of specific knowledge and skills competencies for teacher candidates, I believe the assessments required in section 354.25(a) and the very general standards on which those assessments are based in section 354.25(a)(1) would be vastly strengthened. It is my belief that a menu of objective, measurable standards would lead to the kind of assessment mechanisms that can truly be useful in identifying the strengths and weaknesses of our teacher preparation programs. With such information, the Department can more readily move to correct deficiencies that it may discover in the teacher preparation programs it approves.

2. References to Pedagogy

Although section 354.25 is given the general title “academic competence,” the section appears to place a disproportionate emphasis on competence in “academic disciplines that the candidates plan to teach” at the expense of courses devoted to educational pedagogy. References to “general studies,” “content area courses,” and “major area” in sections 354.25(b), (c), and (d) seem to preclude consideration of pedagogy in the determination of academic competence. Similarly, the standards for assessing the maintenance of academic competence in sections 354.25(a)(1) and 354.25(a)(3) focus on skills related to an academic discipline and on the GPA earned in an academic discipline. This considered, I suggest that academic competence be redefined to clearly include the maintenance of high standards in pedagogical studies.

As indicated in section II(D) of my comments, I believe that preparation programs’ curricula should include a strong emphasis on quality pedagogical studies. If the Department chooses to pursue this course, it would only be appropriate to ensure that proficiency in pedagogical skills be included in any standards established for academic competence. However, even if the Department does not elevate the position of pedagogical studies in section 354.26, I believe that mastery in these areas should be included in the definition of academic competence. Certainly, we agree that an individual’s expert knowledge in a given content area does not automatically provide that individual with the skills to convey that knowledge effectively to others.

Therefore, I suggest that “academic competence” as defined in section 354.25 be broadened to include competence in pedagogical studies.

**D. Preparation Program Curriculum – Section 354.26**

Returning to the idea that the proposed standard should include a clear identification of the specific content knowledge and pedagogical skills a teacher candidate should possess to be proficient in the classroom, I strongly suggest that section 354.26 contain more than the current passing reference to the types of pedagogical instruction that preparation programs’ curricula should include.

1. Classroom Trends Point to a Need for Classroom Management Skills

Recent studies indicating the decline in parent participation in education, the level of violence in Pennsylvania's schools, and the unique challenges presented by efforts to "mainstream" certain students with special needs, clearly describe a public school system in which teachers must be armed with more than knowledge of content areas in order to succeed. In my view, the successful presentation of content information is a challenge under the best of circumstances – let alone in classroom environments that are less than ideal. This considered, I suggest that the Department give attention to the challenges that today's professional educators face in the classroom in order to define the specific pedagogical programs that a professional preparation curriculum should include.

2. Quality Pedagogical Programs

Allow me to further clarify my suggestion by pointing out that I do not necessarily advocate increasing the number of credits a teacher candidate must earn in pedagogical studies, nor do I disagree with commentators who believe that some pedagogical courses are less than academically rigorous. However, I do believe that the quality of existing teacher preparation courses can be improved by pursuing the work I suggest in section II(A) of my comments. With a clearly defined menu of teaching competencies, the Commonwealth could not only provide specific direction to individual preparation programs but could also identify the kinds of pedagogical instruction that correlate to the challenges in the Commonwealth's schools. With this kind of information, the Department could identify and enforce standards that will ensure that our preparation programs' pedagogical courses are relevant and of high-quality.

3. The Possibility of Inconsistent Standards – Sections 354.26(a) – (c)

In the absence of clear standards for pedagogical studies, I am concerned that individual teacher preparation programs will adopt decidedly different interpretations of the "pedagogical knowledge and skills needed to ensure that all students learn" as stated in section 354.26(a). Sections 354.26(a), 354.26(b), and 354.26(c) only refer to standards of pedagogical knowledge in general terms such as "the pedagogical knowledge to teach, guide, and assist public school students in achieving the Pennsylvania Academic Standards." While providing individual programs with latitude to develop their own standards is important and useful, the degree of flexibility provided in sections 354.26(a) – (c) may result in a further diminishing of the quality and relevance of pedagogical studies because of the programmatic inconsistencies among institutions that this flexibility encourages.

Once again, to provide the necessary direction to preparation programs, it may be necessary to identify these content and skill areas, particularly with regard to teaching pedagogy. While section 354.32(a)(1) lists the "skill dimensions" around which a preparation program must develop performance-based assessments, it is not clear that these "skill dimensions" refer to pedagogical knowledge and skills.

4. Required Cooperation with Alternative Certification - Section 354.27(d).

As I understand the Department-created alternative certification program, it is intended to exist as an option that school districts, alternative certification candidates, and teacher preparation programs can pursue if they wish. If the alternative certification program is intended to be optional, I am concerned that section 354.27(d) seems to require a teacher preparation program to cooperate with a school district that exercises its option to initiate an alternative certification process. In the interest of consistency, I would suggest that the Department not require teacher preparation programs to participate in an alternative certification process that is intended to be optional for the school districts that initiate it.

**III. CATEGORY 2 – CANDIDATES.**

**A. Criteria for Admission - Section 354.31**

It is clear that the Commonwealth has a strong interest in ensuring that candidates for teacher certification have the strongest possible foundation in both content areas and pedagogy. However, I am concerned that setting a benchmark for admission to undergraduate teacher education programs does not improve the candidate pool, particularly when a student's accomplishment of this benchmark is based on his or her success in the general education courses on which students in the first, second and third semesters of college primarily focus. I am further concerned that setting such a benchmark for entry into programs is unnecessary micromanaging. In effect, such an entrance-level benchmark may deny students an opportunity to perform at high levels in teacher preparation programs in their final two years of college – the time in which they generally do their best work.

1. 354.31(a)(4) – GPA Exclusive of Professional Education Courses.

There is no reason why grades attained in professional education courses should not be included in any benchmark for admission, whether that benchmark is set by the Commonwealth or by individual programs. To exclude grades attained in these courses from the required average is to arbitrarily diminish the importance of instruction in educational pedagogy. As I noted in section II(D) of my comments, such instruction and the attainment of skills in this area are key to success in the ever-more-difficult area of classroom management.

2. 354.31(a)(4) – 3.0 GPA.

While I believe that establishing grade point average benchmarks for students who wish to enter teacher preparation programs can be useful, I again emphasize that the Department should explore the competencies that an effective teacher exhibits, that an effective candidate should demonstrate, and that a prospective student should exhibit at the onset of his or her teacher preparation program. In addition to this observation, however, I suggest that there will likely be a number of problems with a 3.0 standard.

First, there is no clear equivalency between a 3.0 GPA earned at one institution and a 3.0 GPA earned at another. Second, the 3.0 standard may not include appropriate assessments of skills learned in pedagogical studies. Third, the 3.0 standard does not guard against subjective "grade inflation" as do objective assessments of specific content knowledge and skill competencies.

3. 354.31(a)(4)(v) – 2.8 GPA and Qualifying Scores on PRAXIS I.

Although I have no specific comment on the concept that section 354.31(a)(4)(v) embraces, I would point out that I support the inclusion of alternatives to any entrance-level benchmark that the Commonwealth or an individual program may establish. This section certainly establishes such alternative. However, I believe that this benchmark, that is passage of a standardized test as a requirement for admission to an undergraduate major, would be unique among undergraduate majors offered by colleges and universities in the Commonwealth.

4. 354.31(a)(5) – Ten Percent Exception.

Finally, I support the existence of a discretionary exception similar to that established in section 354.31(a)(5). Exceptional circumstances should be taken into account for some students who fail to meet the entrance requirement. Such an exception for ten percent (10%) of students admitted to the teacher preparation program is reasonable.

**B. Monitoring, Assessment and Professional Competency**

Returning once again to the ideas expressed in section II(A) of my comments, I suggest that the monitoring and assessment mechanisms identified in section 354.32 and the standards for professional competency identified in section 354.33 be undergirded by exit requirements established by the Department. As I stated above, such a system would not only ensure consistency among preparing institutions but would also provide guidance to the programs that must develop individualized exit requirements under section 354.33(a)(1).

1. Relationship of Assessment to Academic Competence – Section 354.32(a)(1)

As I noted in section II(C) of my comments, I believe that clear standards of content knowledge and pedagogical skills would lead to strong and credible assessments of the competencies of individual candidates. Section 354.32(a)(1) lists "skill dimensions" around which a preparation program must create "performance-based assessments." However, there is no reference in this section or in section 354.25 about how competence in these skill dimensions relates to the "academic competence" of a candidate. I would suggest that a clear connection between mastery of these skill dimensions and academic competence could provide a clearer definition of academic competence. Certainly, this approach would be consistent with the suggestions made in section II(A) of my comments.

2. Elements of Assessment of Academic Progress – Section 354.32(a)(2).

The requirement that assessment of a candidate's academic progress be based on at least six data sources is a positive means of determining a candidate's overall competency as a potential teacher. As I suggested above, connecting a demonstration of competency in these six areas to the definition of academic competence in section 354.25 would result in a well-rounded evaluation of a candidate's knowledge and skills. A direct connection between performance in these six areas and academic competence could mitigate the need to rely on a 3.0 GPA as a benchmark of progress in a preparation program.

3. Professional Competency – Section 354.33

As I indicated in section II(A) of my comments, I strongly believe that determination of academic competence, professional competency, and ability as a teacher should be based on the attainment of clearly-identified standards of knowledge and skills. Sections 354.33(a)(1) and (2) require the mastery of "exit criteria" established by a preparation program. Again, I believe that this is a step toward the goal of creating a system of standards for our prospective teachers. However, without the clear guidance of the Department, a clear connection between "exit criteria" and academic competence, or a clear connection between "exit criteria" and the "skill dimensions" around which the assessments required by section 354.32(a)(1) are to be constructed, there will be tremendous inconsistency among the exit criteria developed by individual institutions. To eliminate this potential for inconsistency, I suggest that the Department consider the suggestion included in section II(A) of my comments and so integrate the mastery of skill dimensions with the concepts of academic competence and professional competency.

Returning once again to the requirement of a 3.0 GPA, I restate the concerns I raise in sections II(A), II(C) and III(A) of my comments. I am similarly concerned about section 354.33(a)(4)'s requirement that candidates attain a 3.0 GPA in order to have achieved "professional competency."

#### IV. CONCLUSION

Please accept these comments as those required by the Regulatory Review Act and please be advised that Senator Allyson Y. Schwartz, the minority chairwoman of the committee, concurs with the comments raised in this submission.

Respectfully Submitted,

  
JAMES J. RHOADES  
Chairman



**The Honorable Eugene W. Hickok**  
**Secretary of Education**  
**Page 9**

**Cc: Mr. John R. McGinley, Jr.**  
**Members, Senate Education Committee**