

# Widener University

One University Place • Chester, PA 19013-5792

Office of the President  
(610) 499-4101  
Fax: (610) 499-4196

99 JUL 29 AM 9:13  
HARRISON  
July 26, 1999

Original: 2039  
Harbison  
cc: Harris Tyrrell  
Nanorta, Sandusky  
Markham, Legal  
Delaware Campus  
P.O. Box 7139, Concord Pike  
Wilmington, DE 19803

Harrisburg Campus  
3800 Vartan Way  
Harrisburg, PA 17110

Mr. Samuel Marcus  
Higher Education Association  
Bureau of Teachers Preparation and Certification  
333 Market Street  
Harrisburg, PA 17126-0333

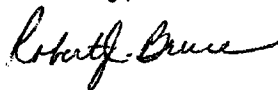
Dear Mr. Marcus:

I write on behalf of Widener University to urge that in the adoption of Chapter 354 regulations the department not impose a single set of teacher education standards upon the Commonwealth's colleges and universities.

Widener University is most concerned philosophically and academically with the end-product or outcomes of its education program and not with inputs that must adhere to a single standards approach to teacher education such as those advocated by NCATE.

To this end, the University has invested much energy and time in supporting the efforts of TEAC, the newly approved accrediting association as an alternate to the single-standards of NCATE. The students of Pennsylvania will be best served by open and creative approaches to teacher education.

Sincerely,



Robert J. Bruce  
President

RJB:jss

cc Dr. Don L. Francis, President  
Association for Independent Colleges





COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF EDUCATION

333 MARKET STREET  
HARRISBURG, PA 17126-0333

July 28, 1999

99 JUL 29 AM 9:11

RECEIVED  
DEPARTMENT OF EDUCATION

Robert J. Bruce  
Widener University  
Office of the President  
One University Place  
Chester, PA 19013-5792

Dear Dr. Bruce:

Thank you for your letter of July 26, 1999 on proposed standards Chapter 354.

Pursuant to the provisions of the Regulatory Review Act, copies of your comments are being provided to the Independent Regulatory Review Commission (IRRC) and the Chairmen of the House and Senate Education Committees.

Your comments will be considered carefully as the Department develops the final-form of these standards.

If you would like to receive information on the final-form of these standards when it becomes available, please contact me at PA Department of Education, Bureau of Teacher Certification and Preparation, 333 Market Street, Harrisburg, PA 17126-0333, telephone 717-787-3470.

Sincerely,

Ronald J. Simanovich  
Chief  
Division of Teacher Education  
Bureau of Teacher Certification  
and Preparation

cc: Senator Rhoades  
Senator Schwartz  
Representative Stairs  
Representative Colafella  
IRRC  
Patricia M. Fullerton  
Dr. Eugene Hickok  
Don Lunday  
Dr. Michael Poliakoff  
Dr. Peter Garland  
George Shevlin

College of Arts and Sciences  
Office of the Dean

Original: 2039

Harbison

cc: Harris  
Tyrrell  
Nanorta  
Markham  
Sandusky, Legal

July 26, 1999

**Bloomsburg**  
UNIVERSITY

99 JUL 29 AM 9:13

TEACHER EDUCATION

Division of Teacher Education  
Pennsylvania Department of Education  
333 Market Street  
Harrisburg, PA 17126-0333

To Whom It May Concern:

I am writing in support of the Teachers Education Reform Bill Chapter 354. It is extremely important that teachers be well schooled in their content area, so that they can properly explain the material to their students. Chapter 354 is a very good start at bringing some credibility to the teaching profession. All too often I have heard students state that they are an education major because it was easy and required very little work. Personally, I know of a teacher that majored in English and was teaching sixth grade math and science. This teacher would ask me to show him how to solve some of the math problems in the sixth grade arithmetic book. This type of situation is very shameful. It is very important that teachers have an excellent understanding of the content area of what they are trying to teach.

I hope that Chapter 354 is just the beginning in reforming teacher education. Further, I would suggest that the next step be to eliminate the undergraduate teacher education major and require all students to have a content major and minor and then use the free electives for the teaching pedagogue courses.

Thank you for your time and if I can be of any assistance, please feel free to contact me.

Sincerely,



Robert P. Marande, Ph.D.  
Associate Dean  
College of Arts and Sciences

RPM/rf

RECEIVED

99 JUL 27 AM 8: 59

BUR. OF TEACHER  
EDUCATION AND PREP.  
106 Waller Administration Building • Bloomsburg University • 400 East Second Street • Bloomsburg, PA 17815-1301  
717-389-4410

A Member of Pennsylvania's State System of Higher Education



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF EDUCATION

333 MARKET STREET  
HARRISBURG, PA 17126-0333  
July 27, 1999

99 JUL 29 AM 9:11

Robert P. Marande, Ph.D.  
Associate Dean  
College of Arts and Sciences  
106 Waller Administration Building  
Bloomsburg University  
400 East Second Street  
Bloomsburg, PA 17815-1301

RECEIVED  
DEPARTMENT OF EDUCATION

Dear Dr. Marande:

Thank you for your letter of July 26, 1999 on proposed standards Chapter 354.

Pursuant to the provisions of the Regulatory Review Act, copies of your comments are being provided to the Independent Regulatory Review Commission (IRRC) and the Chairmen of the House and Senate Education Committees.

Your comments will be considered carefully as the Department develops the final-form of these standards.

If you would like to receive information on the final-form of these standards when it becomes available, please contact me at PA Department of Education, Bureau of Teacher Certification and Preparation, 333 Market Street, Harrisburg, PA 17126-0333, telephone 717-787-3470.

Sincerely,

Ronald J. Simanovich  
Chief  
Division of Teacher Education  
Bureau of Teacher Certification  
and Preparation

cc: Senator Rhoades  
Senator Schwartz  
Representative Stairs  
Representative Colafella  
IRRC  
Patricia M. Fullerton  
Dr. Eugene Hickok  
Don Lunday  
Dr. Michael Poliakoff  
Dr. Peter Garland  
George Shevlin



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF EDUCATION

333 MARKET STREET  
HARRISBURG, PA 17126-0333

July 23, 1999

Original: 2039

Harbison

cc: Harris  
Tyrrell  
Nanorta  
Marksham  
Sandusky  
Legal

Melody Wilt, Ph.D.  
Division Administrator, School Services  
Berks County Intermediate Unit  
River's Chase Business Center  
1111 Commons Blvd., P.O. Box 16050  
Reading, PA 19612-6050

Dear Dr. Wilt:

Thank you for your letter of July 21, 1999 on proposed standards Chapter 354.

Pursuant to the provisions of the Regulatory Review Act, copies of your comments are being provided to the Independent Regulatory Review Commission (IRRC) and the Chairmen of the House and Senate Education Committees.

Your comments will be considered carefully as the Department develops the final-form of these standards.

If you would like to receive information on the final-form of these standards when it becomes available, please contact me at PA Department of Education, Bureau of Teacher Certification and Preparation, 333 Market Street, Harrisburg, PA 17126-0333, telephone 717-787-3470.

Sincerely,

Ronald J. Simanovich  
Chief  
Division of Teacher Education  
Bureau of Teacher Certification  
and Preparation

cc: Senator Rhoades  
Senator Schwartz  
Representative Stairs  
Representative Colafella  
IRRC  
Patricia M. Fullerton  
Dr. Eugene Hickok  
Don Lunday  
Dr. Michael Polakoff  
Dr. Peter Garland  
George Shevlin



July 21, 1999

Division of Teacher Education  
333 Market Street  
Harrisburg, PA 17126-0333

To Whom It May Concern:

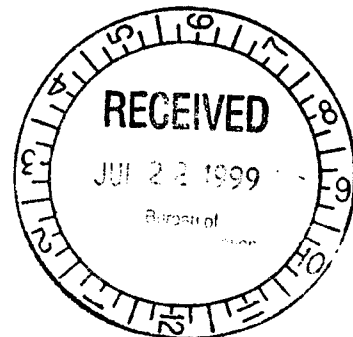
I received a copy of the new Chapter 354 regulations on Teacher Preparation and was appalled at the lack of requirements regarding technology integration skills. I work at an Intermediate Unit and help provide technology training to teachers in the 18 Berks County School Districts. I am often surprised at the lack of knowledge and skills in the areas of hardware, software, and the use of technology to support effective instruction.

Teachers must be equipped to give students what they will need to function effectively in the next century. It is frightening that institutions of higher education might be permitted to certify twenty-first century teachers without extensive experience and coursework in the use of computers and computer applications. How will teachers address the Commonwealth's Academic Standards regarding technology if their own skill level is less than proficient?

I beseech you to reconsider the current regulations and include extensive requirements for technology skills for all future teacher certification programs in Pennsylvania. I would be happy to be contacted further for comment. Thank you.

Cordially,

Melody Wilt, Ph.D.  
Division Administrator, School Services



Original: 2039

Harbison

cc:

Harris

Tyrrell

12 James Street

Mill Hall, PA 17751

July 23, 1999

Nanorta

Markham

Sandusky

Legal

99 JUL 29 AM 9:14

Samuel G. Marcus  
Higher Education Associate  
Bureau of Teacher Preparation and Certification  
333 Market Street  
Harrisburg, PA 17126-0333



Dear Mr. Marcus:

I am writing to you regarding certain proposed changes in the Pennsylvania General Standards and Procedures for Institutional Preparation of Professional Educators.

As a parent of two daughters in college, and as a professional in the field of career counseling and development for the last 24 years, I am most concerned about the required 3.0 GPA after three semesters of liberal arts course work. While I am certainly in favor of improving the quality of teachers in our state, this particular requirement is not related to teaching skill nor teaching quality.

Studies show that the freshman year is one of transition, and many find it much more difficult than expected. I have seen the "A" student in high school struggling to obtain "Bs" and "Cs" during their first year. Does this mean they shouldn't pursue their career goal of being teacher? I would hope not. However, the proposal to require a 3.0 GPA will most certainly discriminate against potentially excellent future teachers who are going through an adjustment period during their freshman year.

Furthermore, do other professions require such a GPA after only three semesters of liberal arts courses? Not that I'm aware of. Yet these proposed standards are assuming that GPA and test scores, after the first three semesters, can determine who will be a good teacher. If these same standards were in place for other professions, I am sure many of us would not be in our current positions.

With regards to the issue of Pennsylvania teacher supply and demand, it seems to be the goal of the current administration to reduce the number of teacher candidates graduating from Pennsylvania schools. While these proposed standards may in fact accomplish that, it may also have the reverse effect of losing these students to out-of-state colleges and universities. An individual who truly wants to be a teacher will simply seek the necessary education elsewhere.

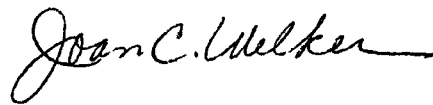
And, as to the quality of the recent and current graduates of Pennsylvania's teacher preparation programs, I have heard nothing but praise for these teacher candidates. The number of school districts from across the nation, coming to Pennsylvania to recruit, continues to increase each year. It's true, many of our graduates would prefer to teach in

Pennsylvania, but if there are no jobs, they are willing to go, and welcomed, in out-of-state districts. What better export from the state of Pennsylvania!

In conclusion, I hope that you will reconsider the current proposed standards and suggest a more reasonable alternative that will not only maintain the quality and integrity of our teacher preparation programs, but also allow individuals to pursue their career goal.

Thank you for your time and attention.

Sincerely,

A handwritten signature in cursive script that reads "Joan C. Welker". The signature is written in black ink and is positioned above the printed name.

Joan C. Welker





COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF EDUCATION

333 MARKET STREET  
HARRISBURG, PA 17126-0333  
July 27, 1999

99 JUL 29 AM 9:11

RECEIVED

Joan C. Welker  
12 James Street  
Mill Hall, PA 17751

Dear Ms. Welker:

Thank you for your letter of July 23, 1999 on proposed standards Chapter 354.

Pursuant to the provisions of the Regulatory Review Act, copies of your comments are being provided to the Independent Regulatory Review Commission (IRRC) and the Chairmen of the House and Senate Education Committees.

Your comments will be considered carefully as the Department develops the final-form of these standards.

If you would like to receive information on the final-form of these standards when it becomes available, please contact me at PA Department of Education, Bureau of Teacher Certification and Preparation, 333 Market Street, Harrisburg, PA 17126-0333, telephone 717-787-3470.

Sincerely,

Ronald J. Simanovich  
Chief  
Division of Teacher Education  
Bureau of Teacher Certification  
and Preparation

cc: Senator Rhoades  
Senator Schwartz  
Representative Stairs  
Representative Colafella  
IRRC  
Patricia M. Fullerton  
Dr. Eugene Hickok  
Don Lunday  
Dr. Michael Poliakoff  
Dr. Peter Garland  
George Shevlin



99 JUL 23 11:19 AM  
RECEIVED

July 23, 1999

Original: 2039  
Harbison  
cc: Harris  
Tyrrell  
Nanorta  
Markham  
Sandusky  
Legal

Division of Teacher Education  
333 Market Street  
Harrisburg, PA 17126-0333

To Whom It May Concern:

I am writing to you in support of the proposed Rulemaking on Chapter 354 of 22 Pa. Code. I have taught mathematics at Penn State since 1964 and was awarded the MAA Regional Distinguished Teaching Award in 1993. In addition to teaching mathematics for engineers and scientists, I have also taught courses that are primarily populated by future teachers. Furthermore I have served on committees charged with establishing requirements for future mathematics educators. I have served as department head during 1980-1982 and 1995-1997.

I welcome the high standards proposed in Chapter 354. Especially important is the assertion that "academic content area courses for the preparation of professional educators shall include all required core courses and required elective courses in the Bachelor of Arts or Bachelor of Science major academic area the candidate intends to teach."

This is a breath of fresh air. For far too long, colleges of education have promulgated the belief that if you have enough courses on the theory of teaching, then you can teach anything. If the 20<sup>th</sup> century has taught us anything, it is that this view is faulty at best. A moment's reflection will convince most anyone that a teacher cannot transmit knowledge if he or she doesn't have it to begin with.

Next I wish to applaud the requirement of a 3.0 GPA. It is a lightly guarded national secret that grade inflation has plagued higher education in America for decades. Consequently when middle-aged outsiders think back on college grades thirty years ago, they are likely to believe that a 3.0 GPA is a lofty requirement. Would that it were so. I regret saying that it is not lofty at all. We must adjust our standards in light of current realities, and the proposed Chapter 354 does exactly that.

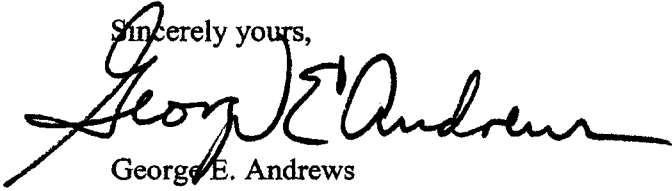
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BUR. OF TEACHER  
CERT. AND PREP.

**Page 2**

Teaching is an art and not a science. Consequently the education of a teacher has two components. First, a teacher must have substantial knowledge of his or her subject. Second, to become a teacher one should serve an apprenticeship. Field experience is essential and critically important. The proposed Chapter 354 clearly recognizes this.

Chapter 354 is a moderate, sensible step in the right direction. I urge its adoption for the good of Pennsylvania.

Sincerely yours,

A handwritten signature in cursive script that reads "George E. Andrews". The signature is written in black ink and is positioned above the typed name.

George E. Andrews  
Evan Pugh Professor of Mathematics

GEA/bak



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF EDUCATION

333 MARKET STREET  
HARRISBURG, PA 17126-0333  
July 27, 1999

99 JUL 29 AM 9:11

George E. Andrews  
Department of Mathematics  
Eberly College of Science  
The Pennsylvania State University  
218 McAllister Building  
University Park, PA 16802-6401

Dear Dr. Andrews:

Thank you for your letter of July 23, 1999 on proposed standards Chapter 354.

Pursuant to the provisions of the Regulatory Review Act, copies of your comments are being provided to the Independent Regulatory Review Commission (IRRC) and the Chairmen of the House and Senate Education Committees.

Your comments will be considered carefully as the Department develops the final-form of these standards.

If you would like to receive information on the final-form of these standards when it becomes available, please contact me at PA Department of Education, Bureau of Teacher Certification and Preparation, 333 Market Street, Harrisburg, PA 17126-0333, telephone 717-787-3470.

Sincerely,

Ronald J. Simanovich  
Chief  
Division of Teacher Education  
Bureau of Teacher Certification  
and Preparation

cc: Senator Rhoades  
Senator Schwartz  
Representative Stairs  
Representative Colafella  
IRRC  
Patricia M. Fullerton  
Dr. Eugene Hickok  
Don Lunday  
Dr. Michael Poliakoff  
Dr. Peter Garland  
George Shevlin



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF EDUCATION

333 MARKET STREET  
HARRISBURG, PA 17126-0333  
July 23, 1999

Original: 2039  
Harbison  
cc:

Harris  
Tyrrell  
Nanorta  
Markham  
Sandusky  
Legal

C. Jay Hertzog, Dean  
College of Education  
Slippery Rock University  
Slippery Rock, PA 16057-1326

Dear Dr. Hertzog:

Thank you for your written testimony on proposed standards Chapter 354.

Pursuant to the provisions of the Regulatory Review Act, copies of your written testimony are being provided to the Independent Regulatory Review Commission (IRRC) and the Chairmen of the House and Senate Education Committees.

Your testimony will be considered carefully as the Department develops the final-form of these standards.

If you would like to receive information on the final-form of these standards when it becomes available, please contact me at PA Department of Education, Bureau of Teacher Certification and Preparation, 333 Market Street, Harrisburg, PA 17126-0333, telephone 717-787-3470.

Sincerely,

Ronald J. Simanovich  
Chief  
Division of Teacher Education  
Bureau of Teacher Certification  
and Preparation

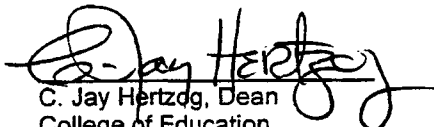
cc: Senator Rhoades  
Senator Schwartz  
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Representative Colafella  
IRRC  
Patricia M. Fullerton  
Dr. Eugene Hickok  
Don Lunday  
Dr. Michael Polakoff  
Dr. Peter Garland  
George Shevlin

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DEPARTMENT OF EDUCATION

59 JUL 26 AM 9:25

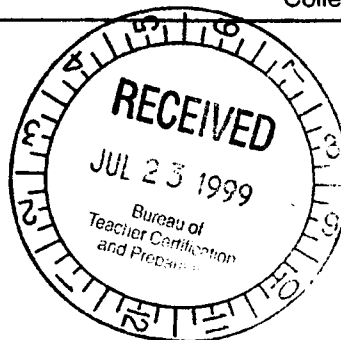
**SLIPPERY ROCK UNIVERSITY**

MEMO TO: Division of Teacher Education

FROM:   
C. Jay Hertzog, Dean  
College of Education

SUBJECT: Proposed Standards for Teacher Preparation

DATE: July 21, 1999



Having assumed the position of Dean of the College of Education at Slippery Rock University on 12 July 1999, being new to higher education in the state of Pennsylvania, and coming from out-of-state, I find myself in a debate that seems to have been ongoing for some time. However, the notion of raising the standards for admission to teacher education and teacher certification is a trend that is taking place throughout the country. A question I raised in my previous state when the discussion turned to raising the standards for teacher education was "where are our graduates falling short? Are the principals who are hiring our graduates voicing concerns about the preparation of our graduates?" If the answers to these questions can be identified, then we must work to address them. However, if we are raising standards in an attempt to address a secondary agenda, we are doing a disservice to those who aspire to teach, those who are teaching, and those who are preparing tomorrow's teachers.

Striving to produce the most competent teachers to work with the youth of our state is congruent with the mission of the College of Education at Slippery Rock University. Because improving education has received increased attention throughout the country, the approach outlined in Title 22, Part XVI, Chapter 354 provides a framework to raise the standards for those who are preparing to be teachers in the public schools. I would hope that the contents of this chapter, prior to it becoming law, would serve as a point of departure for a dialogue between universities, public schools, and the Department of Education to have the k-12 students in Pennsylvania taught by skilled professionals. In fact, many of the proposed standards have already been implemented at Slippery Rock University. However, it is my concern that the proposals set forth in Chapter 354, while raising standards for those aspiring to the teaching profession, may have some unexpected consequences.

The first issue of my concern related to the proposed standard is the mention that students should complete the preparation program within a four-year timeframe (354.26.a.4). As many people can attest, a growing number of freshman students are unsure of a major when they enter college and may change majors one or more times. When students do this, they increase the number of semesters needed for the completion of their college experience thereby carrying their college experience beyond the traditional four-year timeframe. In addition, by limiting students to four years for the completion of a program would have a detrimental effect on those individuals who are pursuing dual certification. In these instances, a student would have to declare one major, continue in that area until certified, and then pursue the second area rather than attempt to complete both at the same time. An example of this approach, which many of our Elementary Education majors choose, is to add Special Education certification while pursuing their degree. This form of dual certification is extremely helpful to our students given the increased emphasis on inclusion in our schools. In this way our students are better able to work with the special needs children who are placed in their classrooms.

A second area of concern with regard to the proposed Chapter 354 is the issue of academic competence as outlined in 354.25. Under the proposal (d) candidates for certification in more than one area must meet the requirements in the major area and for each additional area in which the candidate plans to serve. Implementation of this section would bring about an extreme hardship for small high schools within our service region in particular and throughout the state in general in the fields of science, social studies, and foreign language. An example of how this section could have an adverse effect can be seen in the field of chemistry. According to the spirit of this section, a person certified in chemistry would need to have a major in that subject and would permit him/her to teach only chemistry. However, the reality of the situation is that many of our local high schools do not have a sufficient student enrollment in their college preparatory program to hire a person to teach only chemistry. Rather, these schools need an individual who can teach one or more classes of a science-related course to fully accommodate the students (this same concern may also be raised in the social sciences—history, geography, or economics—and foreign language—Spanish, German, French, or Russian). The alternative to having such a content specialty would be to permit preparing institutions to develop a major such as broadfield science (social science or foreign language). Using this approach the student would develop content knowledge in the sciences (social sciences or foreign language) so that he/she could teach a variety of course offerings within the specified area depending upon the needs of the school.

A third area of concern I have with Chapter 354 is found in 354.31.4.iv. In this section the requirement is made that all students who aspire to enter teacher preparation programs must have a minimum GPA of 3.0 in areas outside of their professional education courses. In addition, section 354.33.4 indicates that candidates must have a 3.0 in their professional education courses and in their academic discipline... "related to the educational specialty in which they plan to serve." In other words, these two areas (354.31.4.iv and 354.33.4) set the GPA for graduation from a teacher education program at 3.0. Why? Will a 3.0 GPA indicate that a student will be a good teacher or a better teacher than a student with an overall GPA of 2.6 or 2.8? As a former principal and assistant superintendent, I can assure you that when I chose faculty for my schools, I was not solely interested in the applicant's GPA. Rather, I was looking for people who could relate to the needs of my students. Sometimes applicants with the highest GPA's could not understand why one of their students had difficulty in a subject. I was interested in hiring the well-rounded student who not only had a respectable GPA, but who also had taken time to get involved in non-academic activities and experience life. In addition, upon entering college, many students have difficulty making the adjustment from high school. This transition to college life results in students receiving low grades during their first one or two semesters. When this occurs early in the student's college career, it becomes extremely difficult for them to bring their GPA's to the level being proposed. However, after students settle into college life and find an area which they want to pursue, their grades improve and their GPA's rise. Given the 3.0 GPA required for three semesters for admission to teacher preparation programs and the 3.0 GPA required for certification, these individuals may never attain their dream of being a teacher. Furthermore, by resting a person's entry and exit from teaching solely on his/her GPA is a myopic approach to teaching because successful teaching is not based only on a person's content knowledge. Rather, successful teaching, unlike many other professions, is a combination of the individual's knowledge of the subject matter and the art to help students understand that subject matter. Finally, the tenor of these areas (354.31.4.iv and 354.33.4) also appears to discriminate against education by establishing a state-mandated GPA. I am not aware of state-mandated GPA's for other majors within the university.

A final area of my concern is found in 354.23. At the end of this section (c), information is requested as to the placement of graduates from teacher preparation programs. This information is currently tracked and available from our university. However, the implications of this section are that teachers from our institutions: 1) are not finding employment in education; and/or 2) finding employment out of state. In either case, the concern does not seem justified. Graduating from a teacher preparation program provides a student with multiple options for employment in a variety of occupations—not just teaching. A look at the recent graduates from the College of

Education at Slippery Rock University indicates that 3 out of 4 of our graduates have found employment in their chosen field, either in a full-time or part-time capacity. Whether or not our most outstanding students are hired is not within the purview of the university, rather, those decisions are made by lay boards of education. In addition, the fact that other states attend our job fairs to attract our teacher education graduates should be viewed as a compliment to our program rather than a mark against the teacher education programs. I personally find it interesting that concern is being voiced about the success students in the Colleges of Education realize in obtaining employment in teaching. Do the same questions arise about graduates from other programs and their success in finding employment in the field of their initial (bachelor's degree) credential or who find employment outside the state?

In conclusion, I concur with much of what is found in the proposed Chapter 354 as it is designed to improve the content knowledge and ability of our graduates as well as to establish multiple methods for monitoring and assessing student progress (354.32). The concerns I have outlined above are provided to serve as areas to consider for the improvement of the proposal. Given the unique clientele we serve in western Pennsylvania (lower income, first generation college students, and rural) we have consistently been the hope of our area's students to improve their station in life by receiving a college degree. In this region of Pennsylvania, as throughout the state, we need of qualified and competent teachers; however, we must not overlook the schools/students we serve. The students in tomorrow's schools must have teachers who are prepared in such a manner as to be receptive to and knowledgeable about the needs of the area and the students they serve. If our region of Pennsylvania is to continue to grow and prosper, we must rely on teachers to provide their students with the materials they will need to be successful. In addition, we must work with our students to assure that they not only have the content knowledge to succeed in the classroom, but also have the teaching/people skills necessary to succeed in their chosen profession. We have done this in the past and will continue to do this in the future.



July 23, 1999

Mr. Samuel Marcus  
Higher Education Associate  
Bureau of Teacher Preparation & Certification  
333 Market Street  
Harrisburg, PA 17126-0333



ORIGINAL 2039  
HARRISON  
COPIES: Harris  
Tyrrell  
Nanorta  
Markham, Sandusky, Legal

Dear Mr. Marcus,

I write in regard to the discussion surrounding the proposed Chapter 354 regulations for teacher preparation and certification. It is my understanding that as the topic of accreditation for colleges and universities that offer teacher certification programs has arisen, some suggestions have emerged that the Department of Education require NCATE accreditation for all institutions offering teacher certification in the Commonwealth.

While I support the Commonwealth's interest in ensuring high quality standards for teacher certification programs, I emphatically do not support the use of NCATE accreditation as the vehicle for achieving this goal. Many respected educators in Pennsylvania and nationally have raised questions about NCATE's appropriateness as a one-size fits all solution to teacher preparation accreditation. Less than half of the approximately 1300 teacher education programs in the United States are nationally accredited, a statistic which reflects the important differences in institutional mission and philosophy behind an institution's teacher education program - quite simply, some institutions believe that complying with the NCATE standards would weaken their programs. An alternative accreditation body, the Teacher Education Accreditation Council, was created in 1997 through a project sponsored by the Council of Independent Colleges, in response to educator's concerns about the need for choice in accrediting associations.

Because NCATE does not accurately reflect the value of small, liberal arts institutions' approaches to teacher education, I believe that requiring NCATE accreditation would do great harm to programs such as ours with outstanding track records and results.

For example, Chatham's approach to teacher education has since its inception been content-based, requiring each student to complete a content major, in combination with the pedagogical study necessary for certification. We believe that this philosophy is much in keeping with the demands of school districts that require more and more content expertise of their classroom teachers every year.

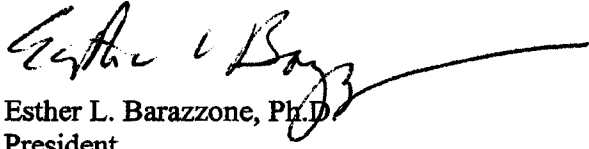
And there is hard evidence that our approach works: in the 1997 study by Carnegie Mellon University Professor Robert Strauss, Chatham teacher certification students ranked first on the Pennsylvania state teacher certification exam in general science and in chemistry, third in English, fourth in social studies, and in the top ten in all other certification areas we offer.

Additionally, Chatham College in partnership with Carnegie Mellon University and the Pittsburgh Public Schools, was chosen last December as one of only 4 sites in the country for the Yale-New Haven Teachers Institute National Demonstration Project. Our partnership received a

\$400,000 implementation grant to create the Pittsburgh Teachers Institute, which brings college and university faculty with content expertise together with K-12 teachers who have pedagogical expertise. Teachers and faculty work together in seminar formats to create new educational unites that are taken back and infused into the public school curricula, strengthening subject content and fundamentally improving the way that teacher and learning occur in the classrooms. The Pittsburgh Public School District is committed to teacher participation from throughout its 93-school system, so that the Institute's benefit will be felt over time by all of the district's 40,000 students. Chatham's historic content-based approach to teacher education was cited as a strong positive influence in the Pittsburgh proposal's selection as a national demonstration site.

Please do not adopt teacher certification accreditation regulations which would not continue to recognize and respect the significant role that liberal arts institutions such as Chatham can play in educating outstanding teachers for the Commonwealth's future. Thank you for your consideration.

Sincerely,



Esther L. Barazzone, Ph.D.  
President

RECEIVED  
99 JUL 29 AM 9: 36  
BUR. OF TEACHER  
CERT. AND PREP.



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF EDUCATION

333 MARKET STREET  
HARRISBURG, PA 17126-0333  
July 29, 1999

RECORDED

99 AUG -2 AM 9:56

ORIGINAL: 2039  
HARBISON  
COPIES: Harris  
Tyrrell  
Nanorta  
Markham  
Sandusky  
Legal

RECEIVED  
REGULATORY REVIEW COMMISSION

Esther L. Barazzone, Ph.D.  
President  
Chatham College  
Woodland Road  
Pittsburgh, PA 15232

Dear Dr. Barazzone:

Thank you for your letter of July 23, 1999 on proposed standards Chapter 354.

Pursuant to the provisions of the Regulatory Review Act, copies of your comments are being provided to the Independent Regulatory Review Commission (IRRC) and the Chairmen of the House and Senate Education Committees.

Your comments will be considered carefully as the Department develops the final-form of these standards.

If you would like to receive information on the final-form of these standards when it becomes available, please contact me at PA Department of Education, Bureau of Teacher Certification and Preparation, 333 Market Street, Harrisburg, PA 17126-0333, telephone 717-787-3470.

Sincerely,

Ronald J. Simanovich  
Chief  
Division of Teacher Education  
Bureau of Teacher Certification  
and Preparation

cc: Senator Rhoades  
Senator Schwartz  
Representative Stairs  
Representative Colafella  
IRRC  
Patricia M. Fullerton  
Dr. Eugene Hickok  
Don Lunday  
Dr. Michael Poliakoff  
Dr. Peter Garland  
George Shevlin

College of Arts and Sciences  
Office of the Dean

Original: 2039  
Harbison  
cc: Harris  
Tyrrell  
Nanarta  
Markham  
Sandusky, Legal

**Bloomsburg**  
UNIVERSITY

July 22, 1999

Division of Teacher Education  
Pennsylvania Department of Education  
333 Market Street  
Harrisburg, PA 17126-0333

99 JUL 29 AM 9:13

RECEIVED  
99 JUL 27 AM 8:58  
BUR. OF TEACHER  
CERT. AND PREP.

Dear Sir or Madam:

I am writing you in support of Chapter 354.

One of the most serious problems in society is the failure of our elementary and high schools. If they were successful, no remedial education would be needed at the college level, and employers would not be complaining about the inability of high school graduates to function at a minimally expected level.

There are obviously many reasons for the failures of these schools. We can find many excuses—poor families, social-economic environment, etc. But the single most obvious reason has been the failure of schools of education to produce competent teachers. This is something that can be changed with some leadership at the legislative level. Schools of education are archaic institutions controlled by people oblivious to their shortcomings who will never reform on their own. Their deans and senior faculty still think obsolete pedagogical theories are all teachers need, and knowledge in subject areas is of no consequence. Their courses are redundant and shallow in terms of content according to their own students. They demand “dumbing down” the courses in Arts and Sciences for teachers in training. They object to intellectual vigor, although students in teacher education are not inferior to those in other fields when admitted. They refuse to recognize that teachers must teach and students must learn reading, writing and mathematics as well as the contents of arts, humanities, social studies, and natural sciences. Which school district hires teachers to teach theories of education, history of education, philosophy of education, social foundation, etc.? The failures of certified teachers to pass basic subject area tests, as shown in New York and Massachusetts in the recent two years can easily happen in Pennsylvania if the same easy tests are given. We must have the moral courage to face the fact that the certified teachers have not been trained properly—they have been deprived of good training by schools of education. NCATE accreditation and Praxis tests have little to do with the teachers’ knowledge in the content areas without which no teaching and learning can happen. NCATE has not emphasized subject areas enough; Praxis II covers only general knowledge at the high school level. When K-12 students do not learn matters of substance such as knowledge and skills in subject areas and are bored, disciplinary difficulties and classroom management issues naturally occur.

The curriculum for secondary education majors must include all courses required for the subject area majors. The curriculum for elementary and early childhood majors may be slightly different but must include at least a minor in the arts and sciences. Actually a better way is simply to require the students to major in a subject area for a bachelor's degree, and to take some courses in education, including student teaching, to get certification—K to 12.

Since the grades in education have already been inflated to the utmost limit, a 3.0 QPA requirement to assure quality can be meaningful only if it is in the subject area and in general education, but not in education. (The mean grade in the Department of Curriculum and Foundations at Bloomsburg University for Fall 1997 was 3.76! For their upper division courses, 94.4% of the grades are A's and B's; 83.1% are A's and A-'s.) A QPA of 3.0 in the subject area is not an unreasonable requirement in that practically all students get better grades in their own major areas because their interest is focused in the major, and most students can rise to the occasion if expectations are high. If it is true that there is not much oversupply in teachers of sciences and mathematics as those in other areas, it cannot be blamed on the proposed 3.0 requirement yet to be applied in the future. Such "shortage" has been caused by the ill-prepared teachers in the high schools who cannot motivate and train enough students to attend college with the proper preparation to major in sciences and mathematics. There is a vicious cycle. Chapter 354 may break this vicious cycle. To have better trained teachers is, therefore, of paramount importance.

I support Chapter 354 of your proposed teacher education reform project because it is long overdue and it is in the right direction.

I support better pay for teachers and urge you to seek legislation in the future to prohibit school districts to hire teachers without the equivalent of a bachelor's degree in the subject area they are to teach.

There are those who advocate the abolishment of education schools. I think these schools should be given an opportunity to reform under Chapter 354 as the first step for improvement.

Sincerely,



Hsien-Tung Liu, Ph.D.  
Dean  
College of Arts and Sciences



COMMONWEALTH OF PENNSYLVANIA  
**DEPARTMENT OF EDUCATION**

333 MARKET STREET  
HARRISBURG, PA 17126-0333

July 27, 1999

99 JUL 29 AM 9:11

Hsien-Tung Liu, Ph.D.  
Dean  
College of Arts and Sciences  
106 Waller Administration Building  
Bloomsburg University  
400 East Second Street  
Bloomsburg, PA 17815-1301

Dear Dr. Liu:

Thank you for your letter of July 22, 1999 on proposed standards Chapter 354.

Pursuant to the provisions of the Regulatory Review Act, copies of your comments are being provided to the Independent Regulatory Review Commission (IRRC) and the Chairmen of the House and Senate Education Committees.

Your comments will be considered carefully as the Department develops the final-form of these standards.

If you would like to receive information on the final-form of these standards when it becomes available, please contact me at PA Department of Education, Bureau of Teacher Certification and Preparation, 333 Market Street, Harrisburg, PA 17126-0333, telephone 717-787-3470.

Sincerely,

Ronald J. Simanovich  
Chief  
Division of Teacher Education  
Bureau of Teacher Certification  
and Preparation

cc: Senator Rhoades  
Senator Schwartz  
Representative Stairs  
Representative Colafella  
IRRC  
Patricia M. Fullerton  
Dr. Eugene Hickok  
Don Lunday  
Dr. Michael Poliakoff  
Dr. Peter Garland  
George Shevlin



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF EDUCATION

333 MARKET STREET  
HARRISBURG, PA 17126-0333

July 22, 1999

Original: 2039  
Harbison  
cc: Harris  
Tyrrell  
Nanorta  
Markham  
Sandusky  
Legal

J Linda M. LeMura  
Department of Health,  
Physical Education and Athletics  
Lawrence H. Tanner  
Department of Geography and  
Earth Science  
Bloomsburg University  
Bloomsburg, PA 17815

Dear Dr. LeMura and Dr. Tanner:

Thank you for your written testimony on proposed standards Chapter 354.

Pursuant to the provisions of the Regulatory Review Act, copies of your written testimony are being provided to the Independent Regulatory Review Commission (IRRC) and the Chairmen of the House and Senate Education Committees.

Your testimony will be considered carefully as the Department develops the final-form of these standards.

If you would like to receive information on the final-form of these standards when it becomes available, please contact me at PA Department of Education, Bureau of Teacher Certification and Preparation, 333 Market Street, Harrisburg, PA 17126-0333, telephone 717-787-3470.

Sincerely,

Ronald J. Simanovich  
Chief  
Division of Teacher Education  
Bureau of Teacher Certification  
and Preparation

cc: Senator Rhoades  
Senator Schwartz  
Representative Stairs  
Representative Colafella  
IRRC  
Patricia M. Fullerton  
Dr. Eugene Hickok  
Don Lunday  
Dr. Michael Polakoff  
Dr. Peter Garland  
George Shevlin

99 JUL 25 AM 9:26  
PROCESSED  
INDEPENDENT REGULATORY REVIEW COMMISSION



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF EDUCATION

333 MARKET STREET  
HARRISBURG, PA 17126-0333  
July 22, 1999

Linda M. LeMura  
Department of Health,  
Physical Education and Athletics  
Lawrence H. Tanner  
Department of Geography and  
Earth Science  
Bloomsburg University  
Bloomsburg, PA 17815

Dear Dr. LeMura and Dr. Tanner:

Thank you for your written testimony on proposed standards Chapter 354.

Pursuant to the provisions of the Regulatory Review Act, copies of your written testimony are being provided to the Independent Regulatory Review Commission (IRRC) and the Chairmen of the House and Senate Education Committees.

Your testimony will be considered carefully as the Department develops the final-form of these standards.

If you would like to receive information on the final-form of these standards when it becomes available, please contact me at PA Department of Education, Bureau of Teacher Certification and Preparation, 333 Market Street, Harrisburg, PA 17126-0333, telephone 717-787-3470.

Sincerely,

A handwritten signature in cursive script, reading "Ronald J. Simanovich".

Ronald J. Simanovich  
Chief  
Division of Teacher Education  
Bureau of Teacher Certification  
and Preparation

cc: Senator Rhoades  
Senator Schwartz  
Representative Stairs  
Representative Colafella  
IRRC  
Patricia M. Fullerton  
Dr. Eugene Hickok  
Don Lunday  
Dr. Michael Polakoff  
Dr. Peter Garland  
George Shevlin





# BLOOMSBURG UNIVERSITY

July 20, 1999

Division of Teacher Education  
333 Market Street  
Harrisburg, PA 17126-0333

This letter is written in support of the addition of Chapter 354, *Institutional Preparation of Professional Educators*, proposed by the Department of Education. Specifically, we support the commitment to the academic competence requirements for professional educator candidates (Section 354.25) and standards for admission to candidacy (Section 354.31). The undersigned have a combined twenty-two years experience in general education and subject area instruction of educator candidates and can speak to the need for stricter standards in admission to candidacy.

All too often we face education students unprepared to perform university level academic work. This has been particularly true of candidates in elementary education. Minimum academic standards are necessary to insure that only qualified students be admitted to candidacy for professional education, as specified in provision a, Section 354.31. We further agree with provision a, Section 354.25, that candidates maintain a minimum grade point average during candidacy. We also agree with provision b, Section 354.25, that the preparation program including study equivalent to the subject area Bachelor of Arts or Bachelor of Science degree is the most effective means of training candidates to teach the subject area.

The future of education demands that professional educators be held to the highest standards and the effort to implement these standards must start with preparation programs. We applaud the effort of the Pennsylvania Department of Education to institute these new standards.

Sincerely,

Linda M. LeMura  
Department of Health, Physical  
Education and Athletics

Lawrence H. Tanner  
Department of Geography and  
Earth Science  
Bloomsburg University

RECEIVED

JUL 22 1999

Secretary  
Postsecondary Higher Education  
PDE

Bloomsburg University, Bloomsburg, PA 17815

A Pennsylvania State System of Higher Education University

# California Area School District

Dr. Marian B. Stephens  
Superintendent

Original: 2039  
Harbison  
cc:

Harris  
Tyrrell 724  
Markham  
Nanorta

750 Orchard Street  
California, Pennsylvania 15419-1428  
(412) 938-2511  
Fax Number (412) 938-2587  
724

July 22, 1999

Sandusky, Legal

Pennsylvania Department of Education  
Division of Teacher Education  
333 Market Street  
Harrisburg, PA 17126-0333

99 JUL 29 11 9: 14

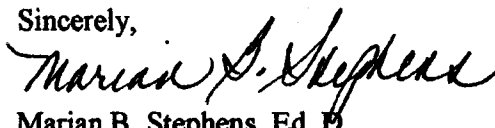
To Whom It May Concern,

It has come to my attention that the proposed General Standards and Procedures for Institutional Preparation of Professional Educators fail to address skills related to technology. As we approach the new millenium the integration of technology in our schools is a fact of life. Our students have the skills that our teachers sorely lack in the area of technology. School districts are now directing many staff development dollars to assist veteran teachers in acquiring the necessary skills so they may effectively integrate technology into both curriculum and instruction. It has been said that the teacher of tomorrow will not be replaced by a computer, but instead by someone who knows how to use one in the classroom.

To allow a person to complete a teacher education program without a technology component and specific technology skills will be to place Pennsylvania teachers at a serious disadvantage in this state or wherever they may choose to teach.

Please address standards for technology integration within teacher education programs to enable Pennsylvania teachers to serve all the skills necessary for a successful career in education, now and in the future.

Sincerely,



Marian B. Stephens, Ed. D.

MBS/cb

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99 JUL 26 AM 11: 27

BUR. OF TEACHER  
CERT. AND PREP.

*Equal Opportunity Employer*



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF EDUCATION

333 MARKET STREET  
HARRISBURG, PA 17126-0333

July 27, 1999

99 JUL 29 AM 9:11

RECEIVED  
DEPARTMENT OF EDUCATION

Marian B. Stephens, Ed.D.  
Superintendent  
California Area School District  
750 Orchard Street  
California, PA 15419-1428

Dear Dr. Stephens:

Thank you for your letter of July 22, 1999 on proposed standards Chapter 354.

Pursuant to the provisions of the Regulatory Review Act, copies of your comments are being provided to the Independent Regulatory Review Commission (IRRC) and the Chairmen of the House and Senate Education Committees.

Your comments will be considered carefully as the Department develops the final-form of these standards.

If you would like to receive information on the final-form of these standards when it becomes available, please contact me at PA Department of Education, Bureau of Teacher Certification and Preparation, 333 Market Street, Harrisburg, PA 17126-0333, telephone 717-787-3470.

Sincerely,

Ronald J. Simanovich  
Chief  
Division of Teacher Education  
Bureau of Teacher Certification  
and Preparation

cc: Senator Rhoades  
Senator Schwartz  
Representative Stairs  
Representative Colafella  
IRRC  
Patricia M. Fullerton  
Dr. Eugene Hickok  
Don Lunday  
Dr. Michael Poliakoff  
Dr. Peter Garland  
George Shevlin



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF EDUCATION

333 MARKET STREET  
HARRISBURG, PA 17126-0333

July 22, 1999

Original: 2039

Harbison

cc:

Harris  
Tyrrell  
Markham  
Nanorta  
Sandusky  
Legal

Dr. James E. Barker  
Superintendent of Schools  
The City of Erie School District  
1511 Peach Street  
Erie, PA 16501

Dear Dr. Barker:

Thank you for your written testimony on proposed standards Chapter 354.

Pursuant to the provisions of the Regulatory Review Act, copies of your written testimony are being provided to the Independent Regulatory Review Commission (IRRC) and the Chairmen of the House and Senate Education Committees.

Your testimony will be considered carefully as the Department develops the final-form of these standards.

If you would like to receive information on the final-form of these standards when it becomes available, please contact me at PA Department of Education, Bureau of Teacher Certification and Preparation, 333 Market Street, Harrisburg, PA 17126-0333, telephone 717-787-3470.

Sincerely,

Ronald J. Simanovich  
Chief  
Division of Teacher Education  
Bureau of Teacher Certification  
and Preparation

cc: Senator Rhoades  
Senator Schwartz  
Representative Stairs  
Representative Colafella  
IRRC  
Patricia M. Fullerton  
Dr. Eugene Hickok  
Don Lunday  
Dr. Michael Polakoff  
Dr. Peter Garland  
George Shevlin

RECEIVED  
DEPARTMENT OF EDUCATION  
HARRISBURG, PA  
99 JUL 26 AM 9:26

# THE SCHOOL DISTRICT, CITY OF ERIE

1511 PEACH STREET • ERIE, PENNSYLVANIA 16501  
 PHONE: 814/871-6370 FAX: 814/871-6281

**DIRECTORS**  
 TIM PEARSON  
 PRESIDENT  
 SAMUEL L. VONA  
 VICE-PRESIDENT  
 TOM CASEY  
 JOHN C. HARKINS  
 JIM HERDZIK  
 RICHARD R. HILINSKI  
 CASIMIR J. KWITOWSKI  
 NANCY R. NIELSEN  
 EVA TUCKER, JR.

DR. JAMES E. BARKER  
 SUPERINTENDENT OF SCHOOLS

July 20, 1999



**SECRETARY**  
 LOIS OWENS

Dr. Michael Poliakoff  
 Deputy Secretary for Higher Education  
 Pennsylvania Department of Education  
 333 Market Street  
 Harrisburg, PA 17126

Dear Dr. Poliakoff:

This is a letter of appreciation from the Pennsylvania Department of Education's Alternative Certification Program. As the second largest employer in Erie County, it is often difficult to find experienced, qualified individuals with the technological and math/science background required to prepare students for today's industry. For example, the Erie School District recently created a program with members of the local industry and educators to develop a Tool & Die Program. This program will provide much needed skilled Tool & Die Makers for Pennsylvania. The district was unable to find appropriately qualified individuals to teach this program. The Alternative Certification Program allowed us to recruit practitioners who assisted us in doing the necessary math, science and literacy appropriately necessary to be effective in the Tool & Die Industry. Creative solutions provide districts with the flexibility required to better educate students. The Alternative Certification Program is one important component in preparing the Workforce 2000.

Concurrently, all Alternative Certification Teachers must have a GPA of 3.0 in their specific area, must pass the NTE including their specialty areas, thereby ensuring that only the best and the brightest are prepared to enter into the teaching profession. This is consistent with the Erie School District's practice of not hiring teachers with less than a 3.0 GPA, with a preference for an advanced degree in content majors, i.e., math, science, etc. This combination of professional factors advantages teachers in the classroom.

It is our hope that the Department will continue to develop Alternative Certification opportunities so that individuals from business and industry can assist school districts better prepare students for the next century.

Should any other information be helpful, please feel free to contact me at 814-871-6370.

Sincerely,

Dr. James E. Barker  
 Superintendent of Schools

The Mission of the School District of the City of Erie, the flagship of educational opportunity that charts the course to individual excellence, is to ensure academic, personal, and vocational success for the individual, with a focus on school-age youth, by using state-of-the-art technology as a catalyst to optimize the delivery of individualized instruction, and to challenge students to realize their potential.



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF EDUCATION

333 MARKET STREET  
HARRISBURG, PA 17126-0333

July 22, 1999

Original: 2039

Harbison

cc:

Harris  
Tyrrell  
Nanorta  
Markham  
Sandusky  
Legal

Dr. Keith Verner  
Director, Penn State University  
College of Medicine Center for Science  
and Health Education  
The Milton S. Hershey Medial Center  
500 University Drive  
Hershey, PA 17033-2390

Dear Dr. Verner:

Thank you for your written testimony on proposed standards Chapter 354.

Pursuant to the provisions of the Regulatory Review Act, copies of your written testimony are being provided to the Independent Regulatory Review Commission (IRRC) and the Chairmen of the House and Senate Education Committees.

Your testimony will be considered carefully as the Department develops the final-form of these standards.

If you would like to receive information on the final-form of these standards when it becomes available, please contact me at PA Department of Education, Bureau of Teacher Certification and Preparation, 333 Market Street, Harrisburg, PA 17126-0333, telephone 717-787-3470.

Sincerely,

Ronald J. Simanovich  
Chief  
Division of Teacher Education  
Bureau of Teacher Certification  
and Preparation

cc: Senator Rhoades  
Senator Schwartz  
Representative Stairs  
Representative Colafella  
IRRC  
Patricia M. Fullerton  
Dr. Eugene Hickok  
Don Lunday  
Dr. Michael Polakoff  
Dr. Peter Garland  
George Shevlin

RECEIVED  
99 JUL 26 11 09 26  
INDEPENDENT REGULATORY REVIEW COMMISSION

**Testimony of Dr. Keith Verner**  
**Director, Penn State University College of Medicine Center for Science**  
**and Health Education**  
**Associate Professor of Pediatrics and Education**

**concerning**

**Rule Making 22 PA Code, Ch 33 Section 354**  
**Standards for Teacher Training**

**July 19, 1999**



Rule Making 22 PA Code, Ch 33 Section 354  
Standards for Teacher Training

Testimony of Dr. Keith Verner

Over the years, I have become acutely aware of the importance of public education. Through my role as a faculty member in Pediatrics at the College of Medicine in Hershey, coordinator of various educational outreach programs, and recent school board president, I have gained the deepest respect for those who make the complex system of public education work. Teachers, school administrators, school boards and parents all share in the mission of giving our children the greatest gift possible – an excellent education.

It is exciting to witness the important new changes occurring in public education in Pennsylvania. There is little doubt that the condition of our educational system - both basic and university education - is one of the most important measures of our State's overall health. Governor Ridge and Education Secretary Hickok introduced State Academic Standards demanding that our K-12 students and teachers have clear, meaningful and measurable academic objectives. The adoption of these Standards, along with the pending Pennsylvania Science Standards, represents a major and long overdue boost to educational reform. However, the Governor's *Pennsylvania's Teacher Preparation Initiative*, promises to have an even greater positive and long-lasting impact on public education in the Commonwealth.

Next to students, teachers are the most important group of individuals in our public school system. No amount of school construction, technology or curricular enhancements is as important as improving the overall quality of our teaching professionals in the classroom. The new *Initiative* first addresses this reality by demanding higher standards for entrance into the profession. The plan sets a requirement of a 3.0 Grade Point Average (or B average), based on three semesters of Liberal Arts studies, for admission into accredited teacher preparation programs. This is to demonstrate the potential teacher's mastery of general knowledge in college level Liberal Arts course work. The requirement of a 'B' average for admission into a teaching program is very reasonable and certainly not too high given the fact that even more stringent cumulative Grade Point Averages are required for entrance into other professional schools such as law, medicine, dentistry, etc. Given their direct impact on so many lives, I



would argue that the teaching profession is every bit as important as any of these. Demanding a minimum of a 3.0 Grade Point Average to gain entrance into education programs will go a long way toward finally recognizing Pennsylvania teachers among the ranks of other professionals in the Commonwealth.

In addition to higher admissions standards, the Governor's plan also prescribes that prospective secondary school teachers take the same courses in their selected discipline as majors in that subject. For example, a future teacher in mathematics would need to take all of the same rigorous math courses as a math major. Further, they would need to maintain a 3.0 Grade Point Average in those courses. This phase of the *Initiative* can only help to strengthen the student's content knowledge base. It would ensure that future teachers are masters of their subjects and fully understand all the details of their chosen discipline. In complying with this requirement, prospective teachers will take these courses from professors in academic departments devoted to the subject area. In doing so, the education students will benefit from close interactions with experts in their disciplines – ultimately conveying this familiarity with the field to their own students. Training by specialists will also serve to build professional bridges that can be exploited in the future to augment classroom instruction.

A third element of the *Initiative* is to require higher scores for passing the National Teachers Exam and the Praxis exam. This is an important component of the plan since no one is served by the certification of students who perform very poorly on such exams. The minimum scores that qualify for certification are often shamefully low. For example, a candidate that gets nearly half the questions wrong on the Praxis Biology test can become certified to teach secondary school Biology in Pennsylvania! The nature of the questions on the exam is so basic that it is difficult to imagine the level of scientific understanding that an individual who scores so poorly actually has. For example, with such low qualifying standards a student could get virtually every question wrong involving molecular biology, cellular biology, classical genetics and evolution and still pass the exam. Clearly, they shouldn't be teaching Biology to our children. This component of the *Initiative* will not pose a problem for students in the future since higher marks on the exams will likely occur as a result of other components of Governor Ridge's *Initiative*. Elevated admission standards into educational programs and high performance in content-based courses will inevitably increase exam scores.

The fourth part of Governor Ridge's *Initiative* relates to alternative certification of teachers. The new plan would provide a mechanism for experts and professionals from various fields to teach in Pennsylvania's public schools without going through a traditional education program. School boards and administrators could hire highly qualified experts that would be closely monitored during their first year in the classroom prior to actual certification. Consequently, scientists could teach science courses, engineers could teach physics, writers could teach composition, historians could teach history, and so on. Private school students have benefited from such expertise for years. It is time for public schools to avail themselves to the same opportunity. The actual number of professionals from other fields that will choose to teach in our public schools is uncertain. However, the infusion of energy and diversity of perspectives that results from this initiative could have a major beneficial impact on the entire system.

The *Pennsylvania's Teacher Preparation Initiative* is an important component of the surge to improve public education in the Commonwealth. The plan is appealing because it is rooted in common sense. It recognizes the central importance of our teachers in the educational process and will serve as a clear guide to promote this critical profession to even greater heights.

Original: 2039  
Harbison  
cc: Harris  
Tyrrell August 5, 1999  
Nanorta  
Markham  
Sandusky, Legal

**SUMMARY OF ORAL TESTIMONY, WRITTEN TESTIMONY AND COMMENTS ON  
PROPOSED STANDARDS 22 PA CODE CHAPTER 354**

- 4 Individuals and/or organizations submitted oral testimony on July 14, 1999 at PA Dept. of Education in Harrisburg, PA.
- 3 Individuals and/or organizations signed attendance register on July 14, 1999.
- 4 Individuals and/or organizations submitted oral testimony on July 20, 1999 at Carbon-Lehigh IU 21 in Schnecksville, PA.
- 9 Individuals and/or organizations signed attendance register on July 20, 1999.
- 7 Individuals and/or organizations submitted oral testimony on July 27, 1999 at Arin IU 28 in Indiana, PA.
- 11 Individuals and/or organizations signed attendance register on July 27, 1999.
- 31 Individuals and/or organizations submitted written testimony or comments before the 4:00 p.m. August 2 deadline date.
- 2 Individuals and/or organizations submitted written testimony or comments after the 4:00 p.m. August 2 deadline date.
  
- 46 **TOTAL ORAL AND WRITTEN TESTIMONY RECEIVED BEFORE DEADLINE**

1999 AUG -9 AM 9:16

**CHAPTER 354 HEARING SCHEDULE  
PENNSYLVANIA DEPARTMENT OF EDUCATION, HARRISBURG, PA  
JULY 14, 1999**

<b>TIME</b>	<b>NAME</b>	<b>ORGANIZATION</b>
9:00	Dr. Arnold Hillman	PA Assoc. of Rural & Small Schools (PARSS)
9:15	John Shropshire Dean of Enrollment Management & Academic Records Clarion University	Penn. Black Conference on Higher Education
9:30	Robert Bartos Dean, College of Education & Human Services Shippensburg University	None
9:45		
10:00		
10:15		
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 HARRISBURG, PA

**CHAPTER 354 HEARING SCHEDULE**  
**CARBON-LEHIGH INTERMEDIATE UNIT 21, SCHNECKSVILLE, PA**  
**JULY 20, 1999**

TIME	NAME	ORGANIZATION
9:00	Tony Johnson Dean, School of Education West Chester University	West Chester Univ.
9:15	John Johnson Indiana University of PA	IUP College of Education
9:30	<del>Harry Feitelbaum</del> <i>Randy D. Schaeffer</i> Assoc. Dean, College of Education Kutztown University	Kutztown University
9:45	Phil Tripp Asst. Director, Career Development West Chester University	State System of Higher Education Career Services
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**CHAPTER 354 HEARING SCHEDULE  
ARIN INTERMEDIATE UNIT 28, INDIANA, PA  
JULY 27, 1999**

<b>TIME</b>	<b>NAME</b>	<b>ORGANIZATION</b>
9:00	John Butzow (Dean, College of Education) Indiana University of PA	PACTE
9:15	<del>Dr. Barbara Grugel</del> Clarion University	<i>Cancelled 7/21/99</i>
9:30	Dr. Gail Grejda Dean, College of Education & Human Svcs. Clarion University	
9:45	Wayne Moore Senior Faculty Member Indiana University of PA	Teacher Education Coordinator's Council
10:00	Constance K. Smith Consultant and Program Assessment	Higher.edu
10:15	John Snyder Assoc. Director of Career Services Slippery Rock University	Mid-Atlantic Assoc. for School, College & University Staffing
10:30	Michael Saraka Director of Career Services St. Francis College	PA Career Counseling Services (PACCS)
10:45	Carla Hart Director of Career Services Slippery Rock University	Slippery Rock University
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CHAPTER 354 HEARING ATTENDANCE REGISTER  
FOR JULY 14, 1999

Red Hill  
John Shropshire  
Paul & Leah

PARBS

Pa. Black Conference on Bible Ed.  
AA General Assembly

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Chapter 354 Hearing Attendance Register for July 20, 1999

Name	Address	Organization	
John R Johnson	104 Stouffer Hall IUP Indiana PA 15705	IUP College of Ed.	1
Tony W. Adams	213 Recitation Hall West Chester University West Chester, PA 19383	W.C.U.	2
Phil Tripp	106 Lawrence-WCU West Chester PA 19383	SSHE Career Services Assn.	3
Mary Ann Maggitti	106 Recitation Hall West Chester University West Chester, PA 19383	West Chester University	4
HARRY TELBAUM	257 BEEKEY ED. CTR. KUTZTOWN U. KUTZTOWN, PA 19380	KUTZTOWN U.	5
Dale Titus	260 Beekey Ed. Ctr. KUTZTOWN U. KUTZTOWN, PA 19380	KUTZTOWN U.	6
Ann E. Batena	MATH DEPT KUTZTOWN UNIV	KU	7
Randy S. Schaeffer	MAT/CIS DEPT. KUTZTOWN UNIV.	KU	8
Kathleen A. Hartman	Dept. of Developmental Studies Kutztown University Kutztown, PA 19380	KU	9
			10



Chapter 354 Hearing Attendance Register for July 27, 1999

Name	Address	Organization	
John Butyr	117 Concord St Indiana PA 15701	PAC-TE	1
Lail Gupta	Clarion University 101 Stevens Hall Clarion, PA 16214	Clarion Univ.	2
Mark Anthony	414 Forest Ridge Indiana PA 15701	IUP	3
Michael Saraka	St. Francis College Box 600 Loretto, PA 15940	Pa CCS	4
Constance Smith	251. Malby Slippery Rock PA	private business	5
CARLA HART	SLIPPERY ROCK UNIV SLIPPERY ROCK, PA	SRU	6
John Snyder	104 Kelly Blvd Slippery Rock PA	NAAACLS	7
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Chapter 354 Hearing Attendance Register for July 27, 1999

Name	Address	Organization	
Reggy Burke	Box AB St. Bonaventure NY 14778	St. Bonaventure University	1
Carol Anne Person	School of Education St. Bonaventure, NY 14778	St. Bonaventure University	2
Wayne Moore	FUP Eberly College of Bus Indiana PA	SD. Teacher Educator	3
<del>JOHN BRADY</del>	Rm 111 RETAILER MANSFIELD UNIV. MANSFIELD, PA.	CERT. OFFICE + TECH. EDUC.	4
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## CHAPTER 354 WRITTEN TESTIMONY AND COMMENTS

DATE REC'D	NAME	ORGANIZATION
7/16/99	Terry W. Blue, Ph.D. Chair, Education Department Elizabethtown College	Education Department Elizabethtown College
7/22/99	Dr. Keith Verner Director, Penn State Univ. College of Medicine Center for Science and Health Education Assoc. Professor of Pediatrics and Education Penn State College of Medicine The Milton S. Hershey Medical Center	
7/22/99	Arlene G. Otis, Ed.D. Division Administrator Student Instructional Services Berks County Intermediate Unit	
7/22/99	Melody Wilt, Ph.D. Division Administrator, School Svcs Berks County Intermediate Unit	
7/22/99	Linda M. LeMura Department of Health, Physical Education and Athletics Lawrence H. Tanner Department of Geography and Earth Science Bloomsburg University	
7/23/99	C. Jay Hertzog, Dean College of Education Slippery Rock University	
7/26/99	Marian B. Stephens, Ed.D. Superintendent California Area School District	
7/26/99	Joan C. Welker Mill Hall, PA 17751	

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DATE REC'D	NAME	ORGANIZATION
7/26/99	George E. Andrews Evan Pugh Professor of Mathematics Penn State University University Park, PA 16802	
7/27/99	Hsien-Tung Liu, Ph.D. Dean, College of Arts and Sciences Bloomsburg University	
7/27/99	Robert P. Marande, Ph.D. Associate Dean College of Arts and Sciences Bloomsburg University	
7/28/99	Robert J. Bruce President Widener University	Widener University
7/29/99	Jenny L. Hershour Etters, PA 17319	
7/29/99	Charles Rubin Assoc. Professor of Political Science Graduate Faculty, Center for Social and Public Policy Duquesne University	
7/29/99	Thomas J. Gentzel Assistant Executive Director for Governmental and Member Relations Pennsylvania School Boards Assoc.	Pennsylvania School Boards Association
7/29/99	Esther L. Barazzone, Ph.D. President Chatham College	
7/29/99	David W. Kirkpatrick Senior Fellow, Allegheny Institute Pittsburgh Distinguished Fellow, The Blum Center Marquette University, Milwaukee Harrisburg, PA 17104	

DATE REC'D	NAME	ORGANIZATION
7/29/99	Stephen C. Wilhite Dean School of Human Service Professions Widener University	
7/30/99	John P. Branson, Ed.D. Director of Educational Technology Chester County Intermediate Unit	
7/30/99	Dale N. Titus, Ed.D. Department of Secondary Education Kutztown University of PA	
8/2/99	Stephen G. Simpson Department of Mathematics Pennsylvania State University	Department of Mathematics Pennsylvania State Univ.
8/2/99	Frederick J. Hartwigsen Mechanicsburg, PA 17055	None
8/2/99	Louis V. Mingrone, Ph.D. Chairperson/Professor Hartline Science Center Bloomsburg University	
8/2/99	Dr. Mary Glennon, RSM Vice President of Academic Affairs and Dean of the College College Misericordia	College Misericordia
8/2/99	Roberta DiLorenzo, Ed.D. Superintendent Washington School District	
8/2/99	Grace Cureton Stanford Associate Professor of Education Coordinator of Urban Education Penn State University, Delaware County	

DATE REC'D	NAME	ORGANIZATION
8/2/99	Mark E. Anthony Director, Career Services Indiana University of Pennsylvania	
8/2/99	Charlene M. Brennan, Director Curriculum and Technology Services Colonial Intermediate Unit 20	
8/2/99	Karl H. Lewis, Ph.D. Assoc. Prof. of Civil and Environmental Eng. and Director of the Pitt Eng. Impact Prog. School of Engineering University of Pittsburgh	
8/2/99	Mahmoud H. Fahmy, Ph.D. President Education and Training Center Wilkes-Barre, PA 18701	
8/2/99	Dr. Daria Brezinski Eartheart Foundation, Inc. Palmyra, VA 22963	

**CHAPTER 354 HEARING SCHEDULE  
CARBON-LEHIGH INTERMEDIATE UNIT 21, SCHNECKSVILLE, PA  
JULY 20, 1999**

TIME	NAME	ORGANIZATION
9:00	Tony Johnson Dean, School of Education West Chester University	West Chester Univ.
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9:45	Phil Tripp Asst. Director, Career Development West Chester University	State System of Higher Education Career Services
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## GENERAL STANDARDS FOR TEACHER PREPARATION PROGRAMS

West Chester University supports the efforts of Governor Ridge and Secretary Hickok to improve the quality of teacher education in the Commonwealth. Clearly, standards for admission into teacher preparation need to be strengthened and standards raised to ensure that students completing teacher education programs possess the knowledge and skills they need to succeed in the classroom. While we support these efforts to raise the standards for those pursuing careers as professional educators, we are concerned that the 3.0 cumulative GPA for admission into teacher education will have unintended consequences. Our concerns are summarized below:

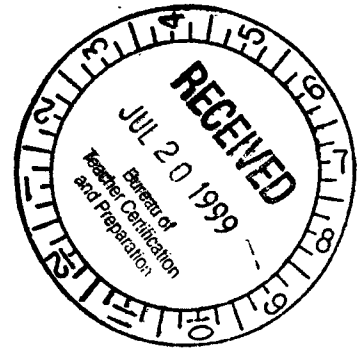
- The 3.0 GPA is an unforgiving standard. Requiring a 3.0 cumulative GPA in the first 4 semesters of college/university coursework as the criteria for admission into teacher education, creates an unforgiving standard. Many potentially outstanding teachers will be denied the opportunity to fulfilling a life-long dream due to a brief lapse during a single semester. One bad or mediocre semester makes achieving a 3.0 GPA within the first 4 semesters a daunting task for even the most capable individuals.
- The 3.0 GPA will result in grade inflation. Establishing a cumulative 3.0 GPA admission requirement on all prior college/university coursework will result in enormous pressure on the faculties teaching general education courses to inflate the grades of substantial numbers of students pursuing teaching careers. We oppose grade inflation as contradictory to the goal of raising standards.
- The 3.0 GPA is a campus based standard that will vary tremendously from institution to institution. We cannot assume that a 3.0 GPA at one institution is equivalent to a 3.0 GPA at another institution. In order to ensure that standards for admission to teacher education are being raised, we need a way of assessing the basic skills and knowledge of students that is uniform rather than campus based.

In short, while we support and commend this effort to improve the quality of those entering the teaching profession, we question the proposed means for achieving this end. As an alternative, we suggest the following modification in the proposed standards for admission into approved teacher preparation programs:

- Establishing a cumulative 2.6 GPA requirement in the first two years of college work for admission into teacher preparation programs.
- Establishing cut scores on the reading, writing, and mathematics components of the PreProfessional Skills Test (PPST) that are equivalent to a 3.0 GPA earned at quality institutions.

Using the 2.6 GPA in conjunction with rigorous scores on the PPST genuinely raises the bar for admission to teacher education. In addition, since students can retake the exam once deficiencies are identified, it is more forgiving, but no less rigorous. A computer based tutorial is available to assist students in mastering these essential skills. Add to this rigorous cut scores on the specialty area exams required for teacher certification and standards can be raised uniformly and fairly. In this way we can improve the quality of those entering the teaching profession.





Testimony  
Presented to:  
Pennsylvania Department of Education  
Carbon-Lehigh Intermediate Unit 21  
Schnecksville, PA  
Regarding:  
Proposed Rulemaking 22PA. Code CH. 354  
Institutional Preparation of Professional Educators  
By:

John R. Johnson, Associate Dean, Teacher Education  
Indiana University of Pennsylvania  
July 20, 1999

I am here to give testimony regarding the proposed Rulemaking on Chapter 354 of 22 PA Code as a representative of the College of Education from Indiana University of Pennsylvania where I serve as Associate Dean for Teacher Education. That which I share with you today is reflective not only of my role as Associate Dean of Education, but also of my role as a school board president for the past 8 years and as Executive Director of the National Association of Laboratory Schools for the past 11 years.

The preparation of quality teachers is a process of constant evolution that requires those engaged in this activity to constantly be cognizant and reflective of society's needs and changes as well as predictive of what skills teachers will need in both the short term and long term future. To say this endeavor is a challenge is a gross understatement. With that in mind, I first applaud the desire to engage in an exercise of proposing new standards for the preparation of teachers in Pennsylvania that will attempt to bring about increased quality of the teachers prepared and thus, with great hope, increase the achievement, learning and eventual preparation of the next generation of public school graduates in the state of Pennsylvania. This is no small undertaking given the ever-increasing diversity of the state's population and the regional and local needs. The task is even further complicated by our collective inability to define what constitutes good teaching, what it is that teachers should know to be effective teachers, what personality traits need to be in place and what it is in terms of the skill and content that public school students need to know.

Everyone in our society is an expert on the matter of schools because we all went to one and the model to which we were subjected is the correct model if for no other reason than we are here today as labeled educated people. Therefore each citizen and policy maker, regardless of background, holds the necessary information to make the policies that will "fix" Pennsylvania education and eventually American education.

As I have carefully studied and re-studied the various versions of Chapter 354, I am constantly reminded that the one missing variable to make this proposal work is resources. The resources of money, time, space, and appropriate personnel, both in quantity and quality, are implied in this set of standards. However, I am pleased that the current version under review has incorporated for the first time, some of the suggestions from those who have elected to make education and particularly the preparation of teachers their life's work. Having said that, there are still some major concerns in the proposed regulations.

From what is stated under *I. Program Design*, the program proposed for a teacher preparation institution under the various subsections would look like this:

1. 354.24 General Studies 6 hours of English and 6 hours of Math being the same required by the BA or BS for that subject area discipline.
2. 354.25 (1). A sequence of courses or experiences or both to develop an understanding of the structure, skills, core concepts, ideas, values, facts, methods of inquiry, and uses of technology related to each academic discipline in which they plan to teach.
3. 354.25 (3) (c) All required core courses, all required electives that are required for a BA or BS in the subject area discipline

4. 354.26 (a) ...ensure that professional candidates acquire and learn to apply the professional and pedagogical knowledge and skills needed to ensure that all students learn that is (1) based on sound research, is (2) non-repetitive, (3) founded in an efficient sequences of courses or experiences, or both in professional studies and pedagogical studies, (4) all of this is to be accomplished by the student within 4 years from the time of initial enrollment.

The key question in terms of the resource of time which is limited to four years by this proposal is: "How does an institution provide the same program for education majors as it would for the BA or BS degree candidates, which normally takes 4 years, and add to it the courses and experiences of pedagogy, professional studies and field experiences, all in the same already spoken for 4 years of college?"

In addition to this, there are many teacher preparation institutions in the Commonwealth of Pennsylvania, which have elected to be accredited by NCATE and by learned discipline based societies. This is done so our teachers are competitive in the national arena and are in tune with and prepared for what is happening nationally. As is the case at IUP, we are already and have been hard-pressed to program all the courses required by PDE, NCATE and the learned societies in addition to the rigorous 53-55 credit Liberal Studies sequence required of all IUP graduates. This is particularly true in the area of Physics, Chemistry, Biology, General Science and Earth and Space Science. The university governance structure has recognized that we cannot keep adding credits to a major that will extend the student's time at the institution beyond a normal 4-year program.

A question will need to be addressed if this set of standards passes and is enacted. Whose standards will be the priority to follow so it all fits into a 4-year program? Will it be the University? Will it be the PA Department of Education? Will it be the learned societies? Will it be NCATE? Quite obviously, if an institution wants to be certified to prepare teachers in Pennsylvania it will be the PDE standards that will take priority treatment. So therefore this means that the standards and requirements of NCATE, the University, and learned societies are not worthy of consideration. As a result, we can conclude that PDE knows without any hesitation that it has "the standards" for teacher preparation and it will be only a matter of time until the rest of the country falls into line

I can tell you that in learned societies such as Speech Pathology, ASHA, the learned society has already established itself nationally as the standard bearer for that profession. This is just one example of the potential conflicts that will occur when increased standards are not aligned with other accrediting agencies.

I believe it is absolutely necessary for a proposed program to be realistically capable of being implemented. Unless there is something I am missing in the wording, I cannot see how this proposed program can be implemented given the time constraints of four years.

The other area I would like to address is the one of cumulative grade point average. At IUP we have found over the years, that some of the best teachers we have prepared, who are the most successful in helping students to learn, are not necessarily the ones with the highest grade point average. I have also seen in recent years, that many of the students who have the most difficulty during "student teaching" are those who have a high grade point average. Some of them have a 3.5 GPA or higher before student teaching. It is a puzzle as to why both of these phenomena are so. It would seem that a person with a high grade point average would naturally be expected to be the best teacher.

I have some speculation as to the answers that are supported across the nation by teacher preparation colleagues.

1. There is a different set of skills needed to acquire knowledge in comparison to the skills needed to help someone else learn. How many of us in our education career encountered a brilliant professor or teacher but found they did not have the ability or the personality to facilitate learning or as we used to say "just could not get it across." Having worked with a few students in a grade school setting that had an IQ above 165, I recall that those individuals had a very difficult time relating to fellow students and even adults for they had no patience for those who could not process information as rapidly as they

could. They did reflect and analyze the same as others. And others who were less capable were a bother to them because they held them back in their quest for information and knowledge.

2. Likewise, it could very well be that a person who has struggled themselves to learn, may have a pre-disposition and innate understanding of the complexities of those who also have difficulty in learning. It could be that they, through experience of life, have learned how to organize material and present it in such a way that a non-brilliant student can grasp the information and concepts. My guess is, above all else, they have empathy and understanding since they know what it is to struggle and to "get it" the first time through.
3. We are concerned that many potentially good teachers will be eliminated from the pool because they cannot achieve and maintain an arbitrary 3.0 grade point average. During a recent meeting of teacher educators from across the state from both private and public institutions we entered into a discussion about this very issue of a 3.0 GPA. These were all successful people most with a doctorate and obviously at the top of their profession with each possessing an admirable track record as a teacher. I asked the question, "How many of you gathered here today had an undergraduate GPA of less than 3.0?" Of the 20 people in the room, all but 3 raised their hands. The question becomes one of accurately defining what constitutes success and what is needed to be successful in each field of endeavor. From that impromptu, unsophisticated survey, a 3.0 GPA did not seem to be the correlating element.
4. I can also tell you that several disciplines at IUP, and the math department is among them, consider 2.0 to be average. Therefore, still using a bell curve or modified bell curve, there are very few A grades and very few B grades. Most of the grades for math courses cluster dramatically at the C level or 2.0. Their argument is, oddly enough, in light of this discussion, "We have high standards and there is already too much grade inflation. The grade of C is average and most everyone is average so therefore that is where the vast majority of the grades will fall."

I predict that when these standards are enacted, the number of Math teachers prepared at IUP will drop significantly as you see, a 2.0 is considered to be average and most of the "math world" is average. This will further frustrate the already short supply of math teachers.

5. In a study completed in May 1999 at IUP Master's Thesis researcher/writer, Laurie Garris explored several related questions evolving around the factors contributing to the predictability of success as a teacher and employability. Below are excerpts from that study that relate directly to the Chapter 354 standards under review from her thesis titled: *Some Distinguishing Academic Characteristics Between Employed and Unemployed Teacher Education Graduates*

Research conducted by Guyton and Farokhi (1987) challenged "the assumption that successful academic performance assures good teaching," (p. 38) and found that the grade point average acquired in upper level courses, where education courses are taught, had a much stronger correlation with teaching performance than did grade point average acquired in lower level courses. They suggested that "requiring a higher GPA to exit a teacher education program than to enter the program" (p. 40) might be a better course of action and would make more sense. And, as they indicated, "instituting such a process may help deal with the concern that high GPA requirements for entry to teacher education may keep out qualified candidates with educational talents. Also, it may be that academic performance in education courses is the best predictor of teaching success" (p.40).

High GPAs and basic skills do not necessarily equate with good teaching. Elimination of students based solely on these criteria may 'weed out' a large group of potential students who would make good practitioners. Gatekeeping may be better accomplished through more stringent exit criteria (Guyton and Farokhi, 1987, p. 41).

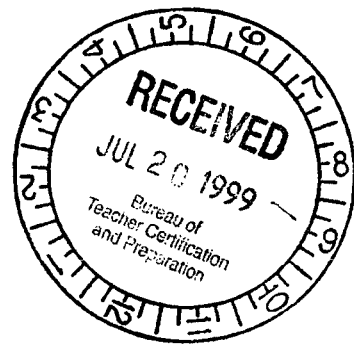
Obviously, it is not just an arbitrary cutoff, such as a grade point average of 3.0 or 2.5, that determines who will be a successful candidate throughout the interview process and who will be offered full-time employment as a teacher. This research suggests that, of all the variables examined, the student teacher evaluation is an academic variable which contributes the most to the ability to obtain full-time employment. Gaining fulltime employment as a teacher may involve a combination of many variables, none of which accurately can be considered alone by administrators and hiring personnel in making a sound decision. Other factors which may contribute to the ability to obtain a full-time teaching position are noncognitive in nature, i.e., the ability to present oneself in a positive manner, the ability to develop rapport, a candidate's personality, and interpersonal skills.

Results of this study clearly indicate that the student teacher evaluation has a statistically significant relationship with the ability to obtain full-time teaching employment. Based on the data collected in this study, there is no way to know whether or not school administrators actually reviewed student teacher evaluations throughout the hiring process. Nevertheless, a correlation was found between student teacher evaluations and the ability to obtain full-time teaching employment. It is possible, therefore, to conclude from this study that those skills and abilities learned by the student and evaluated by the cooperating teacher throughout the student teaching experience contribute the most to the graduate's ability to present himself as competent as a teacher. Therefore, this perception may result in an offer for full-time teaching employment.

The ability to become an effective teacher may also be related to the concept of "excellence," which has been associated with the ability to perform in the classroom and to make use of knowledge (Piper & O'Sullivan, 1981). Therefore, the ability to demonstrate and apply knowledge in the classroom may be far more important to one's ability to obtain a full-time teaching position, than a high grade point average alone.

In summary, as indicated before, not all teachers achieve competency at the same rate or in the same manner; therefore, individualized assessment via the evaluation process may provide a more accurate picture of a candidate's skills and abilities when being considered for employment. Evaluations are often used to support personnel decisions not only at the beginning of one's teaching career, but also throughout, so the findings of this study support the value of the student teacher evaluation process in the development of teaching ability. This study suggests that there may be more value to increasing teacher education exit criteria, as recommended by Guyton and Farohki (1987), rather than instituting more stringent admissions criteria. Since the skills and qualifications of the new teacher upon hiring remain the most important consideration in the school district's ability to acquire quality educators, such a change might be the best solution. For it might provide teaching opportunities for students who do not possess a high grade point average at the beginning of their college career to achieve teaching competency and full-time employment.

In conclusion, it will be interesting to see if the final version of Chapter 354 and its sub-components like a GPA, will be based upon similar research as called for in 354.26 (a) (1) which states, "The preparation program design will be consistent with the unit's mission, reflect knowledge derived from research and sound professional practice and be of high quality."



**Chapter 354**  
**Testimony of Randy S. Schaeffer**  
**Kutztown University**

On behalf of Kutztown University, I would like to begin by expressing our gratitude to the Pennsylvania Department of Education for giving us this opportunity to provide our testimony relative to Chapter 354. I would also like to say that I am both deeply honored and humbled that my colleagues have entrusted me with this very important task. My name is Randy Schaeffer. I am a professor of mathematics and computer science at Kutztown University, and I am actively involved in the preparation of our teacher candidates.

Let me begin by saying that we applaud any initiative that will serve to enhance the education of the children of the commonwealth. At Kutztown University, we too have long been concerned with the quality of teacher education. We take our responsibility very seriously, and we earnestly believe that we already do indeed prepare our students well for careers in teaching. Having said that, we nevertheless view Chapter 354 as another step in the ongoing process of evaluation and improvement of our delivery system.

As you are well aware, there has been a fair amount of controversy attached to Chapter 354. After having thoroughly reviewed it, we believe that Kutztown University and the authors of this legislation are in fact on the same side. We both believe in having high standards, and we both strive toward the same goal: the best teachers we can possibly train. Where we disagree, however, is exactly how to achieve that goal. For the sake of clarity and brevity, our concerns can be summarized into two main areas: (1) the required minimum 3.0 GPA for admission into the program and (2) the requirement that students in an education program take the same courses as those in a BA or BS program in the same discipline.

First, we believe that the 3.0 GPA for admission into the program is prematurely and arbitrarily high. We fear that requiring such a high standard so early in a student's career will prevent many fine candidates from continuing—that we will be left with only white females in the classroom. We obviously need both male and minority teachers to serve as positive role models for our youth. If enacted, the 3.0 GPA entrance requirement will effectively slam the door in their faces.

Many students upon first entering college do not perform at their best. From my own experience, I can say that males are particularly guilty of this. The new-found freedom of life away from home and the change in the teaching/learning paradigm is a veritable culture shock to say the least. Under these new regulations, if a student has just one bad semester—the first—he will probably be prevented from advancing.

We make no illusions about who we are and who we serve. We are an access institution. We don't necessarily get the best prepared students. But we do believe that given time and effort, we can turn out the best prepared teachers. Three semesters simply isn't enough time for some students. Shouldn't we be more concerned with how good our students are when they leave our program instead of when they enter it? From our experience, our requirement of a 2.5 GPA by the end of four semesters has served us well, and has given us the time we need to help our students develop and mature. If the 3.0 GPA requirement is to be enacted, please give our students enough time to attain it.

As we discussed Chapter 354 these past few weeks, both formally and informally, I couldn't help but be struck by the number of examples we all had of students who would not have made it under these regulations. For example, I heard about the young African-American man who got off to a somewhat rocky start, but turned over a new leaf once he actually entered the elementary classroom, and then matured into one of our best teacher candidates ever, being aggressively recruited by both the Philadelphia and Allentown school districts. Had these regulations been in effect, we would have lost him long before he—and we—had realized his potential. I have numerous other examples, all equally compelling, but time prevents me from elaborating.

We are also disturbed that education courses are not to be included in the calculation of the GPA. The psychology, methodology, and pedagogy of teaching encompass a very serious business. Teaching is a profession, and professional coursework is a significant and integral part of a future teacher's education. We believe in having high standards for all our courses. Such an exclusion smacks of elitism and indeed diminishes the worth of what our education professors do; and frankly, we resent it.

Second, we believe that having the course requirements in the discipline for education majors the same as those for liberal arts majors in the same discipline is unnecessarily and unrealistically too rigorous. We believe that the preparation for graduate school (which is what many liberal arts programs are designed to prepare students for) and the preparation for being an effective classroom teacher are qualitatively and quantitatively very different.

I can speak best about my own discipline of mathematics. I want my students to take as many mathematics courses as possible. I want them to have enough depth and breadth so that they understand and appreciate the various branches of mathematics and the interconnections among them. For example, currently my students take three semesters of calculus. Under the new regulations, they would need to take five semesters. As a mathematician, a mathematics educator, and a former high school mathematics teacher, I find such a requirement absurd. One simply doesn't need five semesters of calculus to



effectively and successfully teach middle school arithmetic, but one does need that much calculus to take graduate level analysis. Other disciplines can offer similar examples.

My biggest concern, however, is not having my students over-prepared in mathematics, but rather having them under-prepared to teach. If they are required to take so many additional mathematics courses, and still graduate in the requisite four years, then something will have to be sacrificed. Again, I will use mathematics to illustrate my point. Our BA in Mathematics requires 60 hours of general education and 42 hours of mathematics. That leaves 26 hours for education courses. Student teaching will account for 14 of those 26 hours, leaving only 12 hours for psychology, methodology, and pedagogy. Twelve hours is simply not enough.

Before these proposed regulations came out, I was in the process of developing a course to teach my students how to use technology specifically to teach mathematics effectively. Because there is so much technology, and it is proliferating at an ever-increasing rate, I was having trouble figuring out how to squeeze it all into just three hours. If my students can have only 12 hours of professional courses, I cannot in all good conscience usurp three of those for my technology course. There are just too many other important facets of education that need to be addressed.

At a time when we are witnessing the meltdown of the nuclear family, our education students need more, not less, preparation in how to deal with the problems facing today's youth. Incidents such as the tragedy at Columbine certainly illustrate the point. Increasingly schools find themselves in the position of playing a significant role in the socialization and humanization of children. Learning how to do this effectively and humanely does not happen overnight, nor can it only be learned on the job. Decades of research have empowered us to give our education students insights into adolescent minds, along with strategies to teach them more effectively. Take away our professional education courses, and you remove that empowerment.

Perhaps an historical perspective is in order. When our society was largely agrarian, education was reserved for the few. As we moved into the industrial age, education was required for all, and the factory model seemed most appropriate. And now as we move rapidly through the age of technology, we need a new paradigm. Content is more widely and rapidly available than ever before. What teachers need to do is help their students structure the context of that content. And that is where professional education courses play a role.

Again, I will use my own experience to illustrate the point. I am proud to say that I am a product of the state system. I had much the same program that my students have, the same mix of mathematics courses

and education courses. I will admit, however, that my education courses were not as effective as they should have been. In spite of their best intentions, my education professors did not fully prepare me for the problems that would face me once I got in front of the classroom. The science of teaching was still in its infancy. In the intervening thirty years, we have learned much about teaching and learning. To not take advantage of all that research and knowledge would be a travesty. Simply put, education courses are not the “fluff” that they were once perceived to be. As an aside, I did go on to graduate school in pure mathematics and I was fully prepared for the rigors of that experience, in spite of not having had all the same mathematics as my liberal arts colleagues.

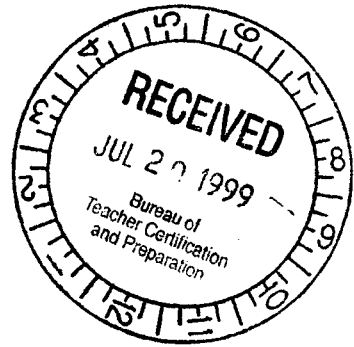
Teaching is as much an art as a science. It is axiomatic that teachers teach the way they were taught. In 1985, the Ford Foundation began an initiative to investigate what they called “the math problem.” In the words of their recently released report, “If teachers don’t change the way they teach, nothing different is going to happen in the classroom.” In 1989, the National Council of Teachers of Mathematics (NCTM), published their *Curriculum and Evaluation Standards for School Mathematics*, a seminal influence in the reform of mathematics education. Because of the efforts of these two groups and others, we are beginning to see substantive results. According to a 1996 National Assessment of Education Progress Report (NAEP), students’ scores on the NAEP mathematics assessment were higher in 1996 than they had been in 1992 and higher in 1992 than they had been in 1990. In 1997 the College Board announced that the average national score in mathematics was the highest it had been in more than two decades. I cite these two organizations because they are in the vanguard of educational reform, and more importantly because they both stress the importance and necessity for sound and innovative training in pedagogy. My colleagues in other disciplines tell me that their professional organizations have likewise reached similar conclusions. Chapter 354 seems to ignore the recommendations of these prestigious bodies by de-emphasizing the need for education courses.

If the number of courses is increased, we also fear that having to maintain a 3.0 GPA in the major may also be prohibitively too high for some majors, particularly math and science. For example, there is currently a national shortage of graduate physics students. A student with less than a 3.0 in physics can be accepted into a graduate program, proceed to obtain a doctorate, and then play a role in developing the systems vital to the defense of the nation. But under Chapter 354, that student would be ineligible to teach in Pennsylvania! And those students who can maintain a 3.0 in a rigorous math or science program will surely feel the allure of higher paying jobs in industry. In short, while Chapter 354 strives to increase the quality of our math and science teachers, it will have just the opposite effect by driving away otherwise qualified and interested students.

We are also concerned that candidates seeking alternative certification will not be held to the same high standard. Although it is not part of Chapter 354, it is our understanding that anyone who graduates with a college degree in a given discipline will be allowed to seek certification in that discipline with a minimum amount of additional coursework, the completion of an apprenticeship, and passing scores on specified Praxis exams. In most institutions in Pennsylvania, all that is required for graduation is a 2.0 GPA. Will such candidates also have to have had a 3.0 in their major?

We have one last concern about requiring education students to take the same general education courses as those in liberal arts. Currently, our education majors do not have to take a foreign language, whereas our BA students must take at least two foreign language courses at the intermediate level or higher. Our small foreign language department is not prepared for the sudden and massive influx into their courses. Obviously additional faculty and resources will be required.

As we were working on our response to Chapter 354, there were those who said that we were wasting our time, that everything had already been decided, that the decision was a political rather than an educational one. I am still naive enough to have faith that our system works, that after input from the experts in the field, changes are still possible. Please affirm my faith by carefully considering our concerns. Thank you.



**Testimony Concerning Chapter 354,  
Preparation of Professional Educators**

**Philip R. Tripp,  
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West Chester University of Pennsylvania  
Representing the  
State System of Higher Education  
Career Services Association  
July 20, 1999**

The members of the Career Services Offices of the State System of Higher Education support the continued improvement in the standards for teachers in the Commonwealth of Pennsylvania. That being said, we also feel that the proposed standards, while well-intentioned toward this goal, need further refinement and examination. Recruiters from our school districts tell us that they are pleased with the quality of our education graduates. The 1999 Public Mind Survey indicates that the people of Pennsylvania feel that Public schools have improved over the past five years and that Public schools should hire only certified teachers\*. Our standards for certification currently rank in the top quartile when compared to other states\*\*. Obviously, we must be doing well already in our preparation of teachers.

In recent meetings and over the course of the past year, we have followed the development of these proposed changes.

They were a major focus of our recent meeting at Indiana University of Pennsylvania as part of the Student Affairs conference for the State System of Higher Education which represents 14 state Universities, representing 95,000 students. Nearly 20,000 of these students are enrolled in education preparation programs.

Among the concerns which have been presented include the focus on having a 3.0 grade point average prior to entering a teacher education program. Most, if not all, of the courses measured by this average are general education courses. While important, they represent a time of exploration and adjustment. They allow many students the chance to develop the understanding and ultimate "passion" for their intended career of education. The final grade point average within the discipline is a much better indicator of potential success in the field.

The increased attention to practical experience through field experiences is also a much better indicator of success. In career services, we find that through "hands on" experiences, whether student teaching, volunteer experiences, service learning initiatives, or field experiences, students develop confidence and techniques which serve them well in their chosen profession. The contact with veteran teachers in these experiences serve as valuable mentoring opportunities which develop networks and allow for the implementation of classroom learning. This practical application is also a much better indicator of potential success in today's diverse classroom.

The emphasis on completing the degree in four years has also generated concern within our group. We agree that a college degree should be completed with efficiency. However, it should not be completed in haste. The assignment of a specific time constraint does not reflect the current status of many of today's college students. In the case of my own institution, the average student works 30 hours per week to contribute to their education. The average course load is 15 hours per week. With a minimum requirement for 128 credit hours to graduate,

that requires an additional semester for completion. And that average reflects the "traditional" full time student. What about the adult student or the individual who has chosen to return to college from another area to pursue a career in education? Advisors and educators within our programs need the latitude to tailor the time needed to produce an excellent teacher. Just as not all flowers bloom at the same time, neither does each student develop at the same rate.

There is much to agree with within the proposed standards. The mere fact that such attention is being focused on the quality of our teachers is admirable. However, we are not producing a uniform product. These are not bare chassis moving down an assembly line. The human being is an individual, and while not the most efficient system, the individualized approach develops the best product in each of us. The SSHE Careers Services Association and I do not propose to set the target so low that every person can hit it, but to challenge each individual to achieve at their highest level. Arbitrary limits cultivate and encourage creative ways to circumvent them, such as grade inflation or internal transfers; a focus on "playing the game", not learning the highest level.

Perhaps the focus of the standards should not only include what is expected of our students, but also what is expected of the institutions, the faculty and ultimately the entire educational system.

Thank you for your consideration of these points. In closing, I would like to reiterate that the attention to standards in education is crucial to our remaining a leading state in the field of education. However, the legislation of certain "benchmarks", such as the 3.0 entrance grade point average requirement does not insure that the best teachers will be developed. Standards can be set in the marketplace allowing employers to select the best candidates as is done in any other professional field.

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\*1999 Public Mind Survey: A Public Opinion Survey On Education Issues In the Commonwealth of Pennsylvania  
<http://psea.org/psea2/MakingNews/Research/pm99.htm>

\*\*Academic Employment Network <http://www.academploy.com>