



Commonwealth of Pennsylvania
STATE BOARD OF EDUCATION

December 1, 2005

Dr. John Baillie
Executive Director
Chester County Intermediate Unit
455 Boot Road
Downingtown, PA 19335

Dear Dr. Baillie:

Thank you for your letter of November 29, 2005 on proposed 22 Pa. Code, Chapter 4, academic standards and assessments.

Your letter is considered as official public comment and is being shared with all members of the Board. Pursuant to the provisions of the Regulatory Review Act, copies of your comments are also being provided to the Independent Regulatory Review Commission (IRRC) and the Chairpersons of the House and Senate Education Committees.

The regulatory Review Act provides that information on proposed and final regulations be mailed to public commentators at their request. If you would like to receive the final-form of these regulations when they are finalized, please make your request to me in writing at the address printed below.

Sincerely yours,


Jim Buckheit
Executive Director

cc: Members of the State Board
Senator Rhoades
Senator Musto
Representatives Stairs
Representatives Roebuck
IRRC

Original: 2499

Human Resources



Chester County Intermediate Unit

November 29, 2005

Mr. James Buckheit, Executive Director
State Board of Education
333 Market Street
Harrisburg, PA 17126-0333

Dear Mr. Buckheit:

I am writing on behalf of the school districts of Chester County and the Chester County Intermediate Unit (CCIU) regarding the Pennsylvania Department of Education's proposed changes in the special education, early childhood and elementary education certificates.

Although these proposals are intended to improve student performance, we believe they may have the opposite effect, and that the increased restrictions imposed by these changes will be detrimental to the learning environment.

We are most concerned with two of the current recommendations. Our concerns are outlined below:

1. Separation of the current pre K-12 special education certificate into two certificates: special education pre K-6 and special education 7-12.

The separation of these certificates is problematic for two reasons.

- A. Students, aged 11 and 12 years old, will no longer be placed in the same classroom unless the teacher has two special education certificates. The CCIU operates several classrooms at the Child and Career Development Center in which children aged 11 and 12 years old are in the same classroom (as this is the most appropriate learning environment for these students). Since employees holding both a K-6 and 7-12 special education certificate will be rare, if the proposed change in certification is approved, these students will be separated.
- B. The proposed change will create a shortage of teachers with special education certification at the 7-12 grade level.
 - i. The vast majority of new teacher candidates choose elementary certification over secondary certification when given the choice. Preservice teacher candidates are unlikely to obtain the multiple certifications required to teach in a secondary, self-contained special education classroom (special education 7-12 certification and certification in each core content area).

This shortage will lead to unqualified teachers teaching the most severely disabled students.

2. The reform of early childhood and elementary education certificates.
- A. The current recommendations restrict evidence-based practices that districts use to meet the needs of an increasingly diverse student population, including:
- i. "Looping" programs in which teachers remain with the same group of students over a two- to three-year period.
 - ii. Non-graded or un-graded elementary settings in which children progress through identified skills and content at their developmental ability.
 - iii. The capacity of districts and teachers to move between elementary grades to accommodate changing student-targeted intervention programs.
- B. While there are specialized skill sets for pre-school children, there is a wide congruence in the instructional knowledge base for K-5 elementary grades.
- C. Chapter 14 regulations allow a three-year age span at the elementary level. The P-3 and 3-6 certificates do not allow students in grades 2, 3, and 4 to be instructed by the same teacher in an appropriate instructional setting as provided by Chapter 14.
- D. School districts will face a dramatic decrease in flexibility for staffing elementary classrooms. School districts often face "bubbles" in student populations that require school districts to adjust the number of specific grade classrooms each year as the bubble moves with the student population. If the proposed changes are approved, instead of reassigning staff as a bubble moves through the second, third and fourth grades, school districts will be forced to furlough staff members while hiring new staff at the same time. This type of forced staff turnover is costly as well as detrimental to the learning environment.

Thank you for considering the long-term implications of the proposed changes in special education, early childhood, and elementary certificates before approving the proposals.

There are solutions to the challenges to education presented by No Child Left Behind, Gaskins, and IDELA. I would appreciate the opportunity to discuss both the ramifications of the current proposals as well as solutions to the urgent issues facing Pennsylvania's public schools.

Best Regards,


John K. Baillie, Ed.D.
Executive Director

cc: Chester County Superintendents
Chester County Human Resources Directors