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May 15, 2006

TO: Independent Regulatory Review Commission

FROM: Pennsylvania Association of Pupil Services Administrators
Dr. Robert B. Cormany, Executive Director *RBC*

RE: Chapter 49 (Certification) Regulations of the State Board of Education

PAPSA wishes to submit the following comments concerning the most recent draft of the State Board of Education's Chapter 49 (Certification) Regulations, which are currently in the Commission's hands.

Section 49.1 Definitions: On page 4, the definition for Educational Specialist eliminates the reference to home and school visitor. This certification has in the past been considered one of the four major categories of educational specialists, along with counselors, nurses and psychologists. PAPSA is concerned that by removing this certification from the definition, PDE is signaling its intent to eliminate the certificate. PAPSA is opposed to the elimination of an area of certification that is in use in virtually every school district. As an act of good faith, therefore, we request that the term "home and school visitor" be retained in the definition.

Section 49.13 Policies: On page 8, under subsection (d) the timeframe for major program reviews of higher education institutions has been changed from a 5-year cycle to a 7-year cycle. PAPSA is opposed to this change due to the added emphasis upon accountability for students, teachers and schools, which have been imposed under state and federal reform legislation such as No Child Left Behind. It would seem inappropriate that a program, which impacts all aspects of educational improvement such as the training of educators, should be subjected to less rather than more scrutiny. The reasoning provided by PDE, which is that this will bring the reviews into compliance with national review procedures such as those of NCATE, is not satisfactory since those reviews are largely directed toward administrative procedures and not content areas. NCATE and other national review programs rely upon content reviews by a wide variety of subject-oriented professional organizations, which offer reviews anywhere from 3-10 years apart. Only PDE has the authority to make decisions about a program's continuity based upon its procedures. We are concerned that PDE has already notified the higher education institutions of the state that a moratorium on review visits will be in effect during the 2006-07 term in preparation for the change to a 7-year cycle. It should also be noted that many university programs do not choose to adhere to NCATE or the separate content area reviews because they vary so widely from standards adopted by Pennsylvania. To make this change will in effect seek to force the universities to become part of such national review procedures, with PDE merely validating the decisions of those certifying bodies.

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Section 49.17 Continuing professional education: On page 10, PAPSA recommends that the wording identifying The various participants in the planning of the professional development plan, i.e., educational specialists, teachers and administrators, be retained as per the earlier draft. The purpose of this is to ensure equitable participation by the three major staff components in planning those professional development activities most essential to their growth and improvement as educators. In particular, to ensure that educational specialists are not subjected to professional development activities more appropriate to instructional staff, rather than programs specific to their unique needs.

Section 49.53 Elimination or change of types/categories of certificates: PAPSA strongly supports the addition of this section, found on pages 13-14, to the regulation. This will prevent unilateral decision making as to when an area of certification may be changed or eliminated. A system of checks and balances is necessary to ensure that proper consideration is given to such requests.

Section 49.69 Deletion of areas from certificates. On page 17, under subsection (a)(1) PAPSA strongly supports the change from 10 years to 5 years for the time frame for seeking deletion of areas from certificates. In the past it has been an all too common practice for districts to require a person to teach in an area for which they are certified but have had no experience for the past nine years in order to break the ten-year cycle and prevent them from qualifying to delete that area from their certificate. A five-year cycle may make it less likely that this practice will continue. This change will help to maintain "Highly Qualified" staff.

PAPSA appreciates the opportunity to present its concerns to the Commission and may be reached for further clarification by contacting the Executive Director at (717) 243-6413.

cc: State Board of Education
Senate Education Committee
House Education Committee