



Pennsylvania Partnerships for Children

Joan L. Benso, President and CEO

Michael J. Breslin, Chair of the Board

20 North Market Square, Suite 300, Harrisburg, PA 17101-1632

June 29, 2006

Jim Buckheit
Executive Director
State Board of Education
333 Market Street, First Floor
Harrisburg, PA 17126-0333

Dear Jim:

Please consider this letter to be Pennsylvania Partnerships for Children's official public comments on the State Board's proposed prekindergarten regulations published in the *Pennsylvania Bulletin*. First, we would like to compliment the Board for recognizing the need to establish basic rules for what hopefully will become an ever-increasing public investment in pre-K programs. In order for this investment to yield successful results, it must support programs that meet generally recognized standards of quality. We believe these proposed regulations represent a major step in the right direction.

We have been involved in the Board's process of developing these regulations since its inception and want once again to thank the Board's chair, staff, and pre-K committee for their openness throughout the meetings, roundtables, and public hearings in which we participated.

At this point, we offer only a few specific comments that we hope will be helpful as the Board moves to adopt final form regulations.

Last November, we told the Board that research supports two overwhelmingly important criteria of effective pre-K programs – appropriate class size and appropriately credentialed teachers.

With respect to the former, we support the inclusion of a requirement in proposed Section 4.20(6) that pre-K classes have at least two adults (minimally a teacher and a teacher assistant) for every 20 children. We believe it is vital that this requirement be retained in your final form regulations.

With respect to credentials, things appear to have become more complicated. We are pleased with the Board's proposed qualifications for teacher assistants in Section 4.20(7). We also support the approach taken to phasing in certification requirements for teachers in community-based programs under contract with districts – as contained in a parallel set of revisions of Chapter 49 (Section 49.85(d)). In response to concerns raised by the Independent Regulatory Review Commission, the Board has agreed to separate from Chapter 49 an additional qualification not directly related to certification – that head teachers in contracted community pre-K programs initially have at least an associate's degree in early childhood education or child development. We therefore urge the Board to include the following provision (that previously appeared in proposed revisions of Chapter 49) in the final form of Section 4.20 as subsection (7), with the current subsections (7) through (10) renumbered as (8) through (11):

(7) Community provided pre-kindergarten programs that contract with a school district to provide head teaching services shall ensure that pre-kindergarten teachers possess a minimum of an associate's degree in early childhood education or child development and that they possess the certification required by § 49.85(d) (relating to limitations) within the time set forth in that subsection.

Given the essential nature of class size and credentials requirements in assuring quality pre-K programs, we ask the Board to retain the class size and teacher assistant requirements in this proposed rulemaking and to shift the proposed contracted teacher qualifications from Chapter 49 to Chapter 4 as suggested above.

We offer one additional suggestion. In our testimony in January, we urged the Board to require districts to develop an initial plan for pre-K rather than waiting until its next strategic plan was due. We explained that this would give the district and potential community partners an opportunity to assess community needs and resources and plan the most effective and efficient use of resources to meet the needs of young children. Your response was Section 4.20(10), which requires the district to submit a plan that describes how it will operate pre-K. However, it does not require the participation of anyone other than the district superintendent or, perhaps, the school board. In fact, in juxtaposition with the last sentence of that subsection, the initial plan is clearly intended to be different from the strategic plan, and, arguably, therefore, not subject to the participation requirements found in section 4.13. We appreciate your effort to address the concern we raised last winter but believe this proposed language is not constructive. We suggest the following revision (or the elimination of Section 4.20(10)):

(10) A school district planning to offer or contract with a community agency to offer a prekindergarten program shall develop an implementation plan that describes the program and its target population ~~consistent with paragraph (e)~~ **in consultation with parents or guardians of pre-K age children, including children with disabilities, and representatives of early intervention and community preschool programs.** The plan must identify the facilities, staffing needs and other resources that ~~the district~~ **the district** will use to deliver the program. In years subsequent to the initial year of the program, the implementation plan must become part of the strategic plan described in § 4.13 (relating to strategic plans) and included in the mid-term review and annual updates described in § 4.13.

We hope these comments are helpful and urge the State Board to move forward with the adoption of final form prekindergarten regulations in Chapters 4, 11, and 12. Thank you for your consideration of our views.

Sincerely,



Robert E. Feir
Director of Education Initiatives



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Commonwealth of Pennsylvania
STATE BOARD OF EDUCATION

July 3, 2006

Dr. Robert E. Feir
Director of Education Initiatives
PA Partnerships for Children
20 North Market Square, Suite 300
Harrisburg, PA 17101-1632

Dear Dr. Feir:

Thank you for your letter of June 29, 2006 on proposed 22 Pa. Code, Chapter 4, 11, and 12 regarding pre-kindergarten programs.

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,

A handwritten signature in cursive script that reads "Jim Buckheit".

Jim Buckheit
Executive Director

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