



PENNSYLVANIA HEAD START ASSOCIATION

PARENTS, STAFF, ADMINISTRATORS AND FRIENDS AFFILIATED FOR CHILDREN

Original: 2543

July 17, 2006

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

REC'D JUL 17 2006

INDEPENDENT REGULATORY
REVENUE COMMISSION

JUL 19 AM 9:07

RECEIVED

Dear Jim:

Please consider this letter to be The Pennsylvania Head Start Association's (PHSA) official public comments on the State Board's proposed prekindergarten regulations published in the *Pennsylvania Bulletin*. PHSA appreciates the Board's process of repeatedly seeking public input, and we commend the Board's thorough and attentive work in this important area. These regulations will set minimum standards that are critical to ensuring that programs contain attributes that are necessary for quality. We view these regulations as a positive step forward for Pennsylvania's youngest children, and yet another indicator of Pennsylvania's commitment to quality early care and education. We would like to provide some specific comments related to the proposed regulations.

First, with respect to chapter 4, we are pleased with the Board's inclusion of language related to curriculum and instruction that is aligned to the academic standards and is accompanied by appropriate assessment strategies. These points are necessary to ensure quality classroom experiences for children.

Second, with respect to class size and teacher child ratios, 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. Research overwhelmingly supports class size and supervision of children as criteria of effective pre-K programs. Though PHSA would recommend ratios as low as 15 to 2, we feel that 20 to 2 sets a minimum making it vital that this requirement be retained.

Third, we agree that districts who wish to operate pre-K programs should do so only after careful planning. The language in Section 4.13 related to strategic planning clearly mandates that districts involve all stakeholders in the process of assessing community needs and resources. The language in Section 4.20(10) related to pre-K implementation plans, however, does not require the participation of anyone other than the district superintendent or, perhaps, the school board. Though the inclusion of this initial plan affords districts the opportunity to begin planning pre-K programs before their next strategic plan, we feel strongly that the inclusion of community partners in this initial plan is crucial to program success. Therefore, we support either the elimination of Section 4.20(10), or the following revision suggested by our colleagues at Pennsylvania Partnerships for Children with one minor change that would highlight Head Start programs as quality partners that schools should consult in the planning process:

3700 Vartan Way • Harrisburg, PA 17110 • Phone (717) 526-4646 • Fax (717) 541-8226
E-mail: stateoffice@paheadstart.org or visit us on the web at www.paheadstart.org

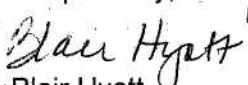
(10) A school district planning to offer or contract with a community agency to offer a prekindergarten program shall develop an implementation plan that describes the program and its target population ~~consistent with paragraph (e)~~ **in consultation with parents or guardians of pre-K age children, including children with disabilities, and representatives of Head Start and other early intervention and community preschool programs.** The plan must identify the facilities, staffing needs and other resources that ~~it~~ **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.

Finally, The PHSA is pleased with the language in Section 4.20(7) which sets minimum qualifications for teacher assistants, however, we would like to take this time to offer some final comments related to the credentialing of lead teachers. We support the parallel set of revisions of Chapter 49 (Section 49.85(d)) that provides for the timely and fair phasing in of certification requirements for lead pre-K teachers in community-based programs under contract with districts. It is our understanding that the Board has agreed, based on concerns raised by the Independent Regulatory Review Commission, to remove from Chapter 49 the additional requirement that head teachers in contracted community pre-K programs initially have at least an associate's degree in early childhood education or child development raised. These additional qualifications are not directly related to certification, and therefore, are not appropriate to include in that Chapter. As a result, we again support the suggestion of our colleagues at Pennsylvania Partnerships for Children that the Board 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.

The PHSA would again like to express appreciation for the State Board of Education's work on these important early care and education issues. We hope the Board finds these comments to be useful, and urge you 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.

Respectfully,

 ^{CBT}
Blair Hyatt
Executive Director

ORIGINAL: 2543



Commonwealth of Pennsylvania
STATE BOARD OF EDUCATION

July 17, 2006

Ms. Blair Hyatt
Executive Director
PA Head Start Association
3700 Vartan Way
Harrisburg, PA 17110

Dear Ms. Hyatt:

Thank you for your letter of July 17, 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 black ink that reads "Jim Buckheit".

Jim Buckheit
Executive Director

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

INDEPENDENT REGULATORY
REVIEW COMMISSION

2006 JUL 19 AM 9:09

RECEIVED