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DEPARTMENT OF EDUCATION

LYCOMING COLLEGE  
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INDEPENDENT REGULATORY  
REVIEW COMMISSION

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AUG 02 2007  
PA. STATE BOARD OF EDUCATION

To: All Concerned Parties  
From: Dr. Rachael Hungerford, Chair  
Lycoming College Department of Education  
Re: Proposed changes to Chapter 49-2  
Date: July 31, 2007

As chair of the Lycoming College Department of Education, I am requesting that the Pennsylvania State Board of Education, all legislators and the IRRC seriously reconsider the proposed certification changes to Chapter 49-2.

I do not feel that enough serious consideration has been given to the negative impact these changes will have on the financial resources and student enrollment of universities and colleges, in particular, those small colleges who only offer teacher certification programs.

I feel the current teacher certification guidelines are very efficient and most effective for teacher preparation in Pennsylvania. It is my hope that the current certification requirements will remain in place.

As a member of PAC-TE, Lycoming College has previously indicated support for what we have referred to as the AADL (adaptations and accommodations for diverse learners) portion of the proposed regulations. We are willing to comply with AADL.

Along with PAC-TE, we would also like to reinforce the concept that teacher preparation does NOT begin with acceptance into teacher preparation after forty-eight (48) credits. It begins during those early semesters when prospective educators take courses that assist in their decision to pursue that career path and are required for completion of the program.

Institutions of higher education view their published program for students as a "contract" between the institution and their students. Most believe that they have at the very least a "moral" responsibility to deliver course content as it is described to students at the time of their enrollment. . . at the beginning of their college experience - NOT after several semesters and NOT when they officially are admitted to teacher education. In keeping with this accepted practice, Pennsylvania teacher education preparation programs believe they should have fully developed and published programs of studies for teacher education at the beginning of the typical four-year teacher preparation program.

Please feel free to contact me by email: [hunger@lycoming.edu](mailto:hunger@lycoming.edu), phone: 570-321-4213, or by mail: Dr. Rachael Hungerford, Lycoming College, Box 22 700 College Place, Williamsport, PA 17701.

Thank you. *Dr. Rachael Hungerford*

Enclosures  
RH:bh



From: Dr. Rachael Hungerford, Chair  
Lycoming College Department of Education  
Date: July, 2007  
Re: Proposed Chapter 49-2 changes

Listed below are my concerns and those of my college:

1. The split of Elementary (K-6) certification into N-3 (early childhood) and 4-8 (elementary) certifications is not a well thought out or sound possibility.

Consequences of this split are as follows:

- The creation of a lack of continuity in elementary program since teachers at all grade levels (k-6) need to understand the academic and development issues and stages of students through all grades. Students in the primary grades may need instruction at a higher level and those in the intermediate grades may need instruction at a lower level. Different preparation programs will not provide the needed understanding to make this happen,
- These proposed changes to levels create limits for school districts. For example, a school may have one large group of students in a primary level and so needs 3 primary teachers but when that large group of students moves on to intermediate grades the need for 4 teachers moves with them. That third teacher in the primary grade can now move up to where she/he is needed. The new changes would not allow this and districts will be faced too many or too few teachers where they need them.
- Other near by states (Ohio) have tried this new format of certification and have found it is not useful at all.
- We have many students who come to our college from other states – New York, New Jersey, Maryland, Delaware, and Virginia – for their education and especially for teacher education. Pennsylvania college and universities have excellent reputations. Lycoming has about one third of its students who are from other states. With the current certifications these students can transfer their teacher certificate to their home and to other states very easily. This transfer will not be easy and often not even possible under the proposed certification changes. Many out of state students will not be willing to come to PA for their teacher education if they have to deal with these changes.
- These out of state students contribute a great deal to the financial stability of the towns and cities in PA where the colleges and universities are located and the loss of revenue will be substantial.
- Many PA colleges and universities do not have the faculty, Facilities or funding to implement these new changes. At Lycoming we would have to create a whole new Early Childhood program which would mean a new tenure track position, completely restructure our existing elementary and secondary programs as well as add additional courses. Little of this is economically feasible for our college. Meanwhile, these

new changes would also mean loss of approximately one third of our out of state student population who come here specifically for teacher education certification.

Suggestions:

- Keep the existing certifications and provide options for teacher candidates to specialize in either early childhood or upper elementary/middle areas. Such specialization could be done as a concentration of courses or a special endorsement that happens after graduation and their initial certification is acquired. This would also fulfill the requirement for 24 additional credits in order to maintain certification. Endorsements would provide focus for those credits rather than the current random selection that often happens now.
2. The split and the additional requirements for special education certification is another serious concern.
- The supply of special education teachers is very low and are the ones in the most demand. Additional requirements of dual certification for every special education teacher will make this situation much worse. For most of us it means that our students seeking special education certification will not be able to complete their work in the four required academic years and in very substantial increases in the cost of their education. Both of these things are unnecessary burdens on students. Consequently many students may choose not to seek special education certification and adding to the already serious and growing problem of teacher shortage in this area.
  - The issue of reciprocity of certificates for out of state students applies to special education certificates as well as elementary and secondary.
  - The impact on higher education will be enormous and negative. At this time it is extremely difficult to hire highly qualified faculty in the special education areas. There are simply not enough faculty out there and there is no sign of this changing in the near future. These new changes/requirements will make the demand even greater.

Suggestions:

- Keep the existing certifications and provide options for teacher candidates to specialize in the other certification areas after they get their initial special education certification. This can be done in the same way as suggested above for elementary and secondary and early childhood.
3. The proposed new certification grade levels are not consistent with elementary and middle school organization as shown by theory and research.
- Currently most middle schools are organized around a 5-8 or a 6-8 grade level configuration. Research shows and most educators agree that the 6-8 grade configuration is better for students since it is based on developmental and academic needs of that age group.

- PA has spent a great deal of time, money and energy researching and writing up a plan for middle school certification that meets the criteria of adolescent development as set out by the National Middle School Association. The new changes negate this certification and do not consider the huge range of differences in academic and development between 4<sup>th</sup> graders and 8<sup>th</sup> graders.

Suggestions:

Keep the existing elementary and secondary education certifications as they are and offer the option of a new middle school certification as outlined by PDE

4. Additional course and hour requirements for all certifications in the area of special education and English language learning are not consistent with needs and practice.
  - Traditionally teacher certification requirements have been presented as competencies and not just course work. Many existing courses already include competencies in these areas or could be easily restructured to do so.
  - Again finding and funding more full time faculty to offer these courses is limited. It is not possible to simply add more courses to our existing programs since our programs are already set up to meet PDE requirements. Available faculty is very difficult to find. Those teachers who are already qualified in these areas often prefer to work in public school where benefits and pay are better.
  - Increase in course load means an increase in cost for students as well and tuition for higher education is already rising at an alarming rate.

Suggestions:

- Provide special education and English Language Learner requirements as competencies not courses or hours – a practice consistent with existing teacher certification programs.
- Allow or require teachers to use their required 24 credits after they get their initial certification as suggested earlier in this document.

Increasing the quality of teacher in and trained by the Commonwealth of PA is important and needs careful consideration. Cooperative ventures among all areas of teacher education are already in place and provide creative ways to accomplish what we want. Accommodating the financial needs of perspective students is also necessary. While we can always improve we are already doing a fine job.

Thank you for your time and consideration. I deeply appreciate it.

