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House of Representatives
COMMONWEALTH OF PENNSYLVANIA
HARRISBURG

Chairman Education Committee
Intergovernmental Affairs Committee

Caucuses

PA Higher Education Assistance Agency, Member
Board of Directors

PA Historical And Museum Commission
Black History Advisory Committee, Member

April 25, 2007

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

RE: Proposed Regulation #006-303(Chapter 49-2 - Certification of Professional Personnel)

Dear Mr. Buckheit:

Pursuant to Section 5 of Act 181 of 1982, known as the Regulatory Review Act, the House Education Committee held a hearing on Wednesday, March 28, 2007, to review proposed regulation #006-303, State Board of Education, 22 PA Code, Chapter 49-2: Certification of Professional Personnel. At this time, the Committee has several concerns and thus offers the following comments, which were prepared by the Committee's bipartisan staff:

1) Requirements related to instructional certificates issued on or after January 1, 2012:

- Less flexibility to staff elementary schools
- Split of elementary certificates puts Pennsylvania education graduates at a distinct disadvantage with those from other states; discourage teacher candidates from enrolling in Pennsylvania teacher preparation programs and makes Pennsylvania graduates less employable in other states. Every state on the eastern seaboard (except Georgia) has a K-6 certificate along with early childhood and Middle School certificates. Reportedly, Texas is reversing itself and plans to move from its more restrictive certification levels similar to those included in the proposed Chapter 49-2 revisions to a larger span elementary education certification as currently exists within Pennsylvania.
- Force graduating teachers to obtain dual certification (K-3 and 4-8) in order to be appropriately prepared to teach children in their future classes.
- Require future teachers to choose a certificate before they have the opportunity to experience the realities of teaching in range of age groups.
- Increase costs for the 95 colleges and universities with teacher education programs. Additional costs would also be placed on students because of the extra course work required, possibly

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extending the time to graduate to 5 years, at least for Pennsylvania's State System of Higher Education universities which must operate within 120 credit hours to graduate and on the state, which helps to fund public education.

- Inappropriately place grade 4 and grade 8 in the same certificate preparation program when children in these grades are developmentally different.
- Require compliance before teacher education programs can adjust their programs.
- Narrow the preparation of elementary certificate holders at a time when teachers are expected to work with a broader range of performance in their classes.
- Lead to over-specialization at lower grade levels at a time when many curriculum experts are suggesting a wider range of content in teacher preparation programs.
- Reassigning staff to accommodate the lack of properly certificated professional may be limited by the collective bargaining agreements.
- Exacerbates the existing shortages in upper-elementary certified and special education teachers.
- Increases the responsibilities of school districts by requiring them to "offer" opportunities in continuing professional development activities related to diverse learners and to "ensure" that all professional employees participate in such opportunities including those professionals in community providers for pre-kindergarten programming if the community provider is under contract with the school district.

There were several recommendations provided to accommodate the practical issues that school districts would face in implementing these suggested changes including maintaining the K-6 certificate in addition to the Early Childhood (pre-K to 3) and the Elementary/Middle certificate (Grades 4 -8) or, at a minimum, offering overlap between the grade levels as well as having the department offer voluntary suggestions through the Certificate and Staffing Policy Guidelines included in Section 49.83 (3) in order to accommodate the Board's desired staffing arrangements.

2) Timetable for change in Instructional certificates

The Board's needs to address why implementing these changes in certificates for the 2012 graduates is reasonable and appropriate.

3) Concerns that the Board will only grant exceptions to the program requirements for a teacher education program "that apply Statewide" shortages of certified personnel as opposed to also allowing for local shortages of certified personnel. Concerns were also expressed about what criteria will be used by the department in granting these exceptions, how will exceptions be granted for immediate or short-term vacancies as well as whether these exceptions (emergency certificates) are allowable under the No Child Left Behind Act or will such a designation deem an affected teacher as not highly qualified under the Acts' provisions.

4) Flexibility in Additional 12 Credits (360 hours)

Given the concerns about the ability of teacher education programs to fit the additional 9 credits or 270 hours of diverse learner courses and 3 credits or 90 hours for English language learners into their existing program, consideration should be given by the Board to spread out this requirement over both the Instructional I and Instructional II certification timeframe. For example, require 6 credits or 180 hours of diverse learner courses for Instructional I certification and require 3 more credits or 90 hours of diverse learner courses as well as 3 credits or 90 hours for English language learners for Instructional II certificates. There are other variations that should be considered as well.

Additionally, this greater flexibility in this requirement should be accompanied by the Department offering free courses on diverse learners and English language learners to teachers seeking Instructional II certification and continuing education credits under the Chapter 48 requirements.

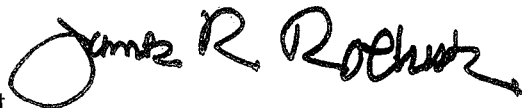
It has been further suggested that rather than requiring dual certifications, consideration should be given to offering "concentrations" to already certificated teachers based upon completion of a set number of hours or credits of continuing professional development.

The committee and its staff greatly appreciate many of the other issues addressed by the Board and the effort which went into the proposed changes. We compliment the Board members and its staff for their hard work and look forward to working with them in their effort to improve Chapter 49-2.

Sincerely,

James R. Roebuck, Chairman
House Education Committee

JRR/st



cc: Mr. Arthur Coccodrilli, Chair, Independent Regulatory Review Commission
House Education Committee Members
Honorable James Rhoades, Chairman- Senate Education Committee