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January 24, 2007

State Board of Education Jim Buckheit, Executive Director 333 Market Street Harrisburg, PA 17126-3787 Dear Mr. Buckheit, RECEIVED JAN 2 9 2007 PA. STATE BOARD OF EDUCATION



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I am very concerned about the proposed changes in the draft of Chapter 49-2. As the Dean of the College of Education at East Stroudsburg University of Pennsylvania, I have reservations about these changes on numerous levels.

I have had almost 30 years of experience in elementary education and I believe the proposed grade level changes in certification would be a profound mistake. One of my most critical concerns is the elimination of certification in elementary education. I believe that this is an extremely important certification that should not be condensed into Early Childhood or Middle School certification. The current elementary certification allows students to obtain certification for grades K-6. Our students are wellprepared to address the specific content and needs of learners of within this age group. The proposed grade level changes would not be beneficial for teacher candidates or young children. The mix of early childhood and elementary truly represents very different cultures within education that have unique needs. The same concern could be addressed with an elementary and middle school combination. It would be extremely difficult and ineffective to attempt to adequately meet the needs of those involved through one certification, especially within a 120 credit degree program. Currently the early childhood certification covers preschool - grade 3, but most students that pursue that option don't want to teach in public school settings and they often want just preschool preparation. I believe there needs to be a separate elementary track that focuses on the developmental needs and curriculum that are so different from the preschool culture. I seriously believe there needs to be separate certifications for early childhood and elementary education.

An additional concern is the future marketability of our graduates. The change in the certification to preschool-grade 3 (the new Early Childhood

East Stroudsburg University of Pennsylvania A Member of Pennsylvania's State System of Higher Education An Equal Opportunity/Affirmative Action Employer proposed arrangement) is very narrow in terms of the variation in grades that can be taught by our graduates. It will be very difficult for our graduates to get jobs in other states where elementary certification is desired. This is unfair to limit them in their marketability. Many students will opt to attend schools in other states that offer a broader range of certification options.

Another problem that will not surface for a few years is the reality that very few students will opt for certification in grades 4-8 and we will see a tremendous shortage of teachers that are prepared to teach these grade levels. Many students now often say that don't want to teach upper grades, so we anticipate that very few students will seek this certification while the early childhood market will be flooded. School administrators will have an extremely difficult challenge finding teachers for these age groups as the certification for teachers will be so limited.

The requirement of having a middle school certification (including a content area) will put a huge burden on programs that need to now have many more faculty available to teach content driven methods courses for a new age group. Many of the content professors will not have any experience teaching these age groups and this could lead to the use of inappropriate methods and curriculum for the middle school population.

Our program quality will suffer tremendously with the additional credit requirements for special education and diverse learners. Many valuable components will have to be cut to meet these new regulations, especially within the confines of a 120 credit program. The requirement for more courses in special education and diversity will place a huge demand on programs for more faculty and resources. This will create a burden on many institutions of higher education that are already in need of additional funding.

The time and effort that will have to be spent making these changes will be extremely costly to each institution of higher education. These changes would bring about a major revision of early childhood, elementary, special education, and secondary education programs. This would be a very costly effort that in the long run will not be best for our graduates that the students that they would teach (if they even get hired!). In summary, I have grave concerns about the new regulations, particularly the elimination of elementary education certification. I hope that you will do everything in your power to prevent these changes from taking effect.

Sincerely,

Pamela A. Kramer, Ed. D. Interim Dean, College of Education East Stroudsburg University of PA