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INDEPENDENT REGULATORY REVIEW COMMISSION

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

Jan. 25, 2007

To the Members of State Board of Education,

I am writing to express concern over proposed changes to Pennsylvania's system for teacher certification (Chapter 49-2). As a former schoolteacher and now a teacher educator at the Pennsylvania State University, I need to question the likely consequences of such serious alterations to licensure. My concern is that the proposed changes to Chapter 49-2 will cause disruptions and unforeseen dilemmas without providing any definitive benefits in return.

First, the changes will likely result in a lack of flexibility in grade-level assignment for elementary schools. Administrators staffing Grades 4-5 would be unable to draw from the Early Childhood (PK-3) pool and would be in competition with middle schools over the potentially quite limited Middle (4-8) pool. Second, the proposed licensure structure may cause shortages of teachers for Grades 4-6. Secondary certification (Grades 7-12) provides wide flexibility, as does the proposed new Early Childhood certification (PK-3). I am not sure that the Middle certification (Grades 4-8) will be as attractive because it teaches to two developmentally different "age levels" (pre-adolescent children and "tween" adolescents). Grades 7 and 8 can be filled by candidates with Secondary licenses, leaving Grades 4-6 in a potential deficit situation. Third, there may be unintended impact on high-school special education. Candidates interested in working with special-needs children may be drawn to the Middle (4-8) license, resulting in a potential shortage of special-education instructors certified for Grades 9-12. Finally, the proposed changes may interfere with reciprocity of licensure between PA and other states. Particularly a teacher with Grade 4-8 certification would not readily fit into the structure of the majority of other states, which divided licenses between Grade 6 and under and Grades 7-12. Given the tightness in the teacher job market in Pennsylvania and the likelihood that many new teachers need to look for jobs out of the state, the Early Childhood (PK-3) and Middle (4-8) licenses could prove problematic.

In conclusion, I advise caution in proceeding with the proposed changes. What is the research base informing the decision? I have not encountered any research that definitively supports this kind of licensure for improving student outcomes. Other states like Ohio have adopted the K-3/4-8 split, and I am not convinced it has been a positive experience. Thank you for your time and for considering my concerns.

Scott Alan Metzger, Ph.D.
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