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INDEPENDENT REGULATORY  
REVIEW COMMISSION

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PA. STATE BOARD  
OF EDUCATION

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

Subject: Chapter 49-2

Dear Mr. Buckheit:

I am writing to you concerning the "Proposed Rulemaking" of 22 PA Code Chapter 49-2. The amendments have some validity but my main concern is the certification. To implement instructional certificates following the grade level limitations as outlined will only increase the severe teacher shortage already prevalent in the state of PA. Also forcing students to dual certify with Special Education may deter students from entering the program.

The \$3.2 million dollar implementation cost will be passed onto the student making the overall cost and student loans unattainable for some students. Teachers with this dual certification may be assigned to teach Special Education classes which never were their intent. Now we have teachers in areas where patience and understanding are not met. Presently some regular education classroom teachers do not have a realization of the adaptations and modifications needed for students with disabilities to be successful. I do not find it unreasonable to have education students include specialized credited coursework specifically geared to the student with disabilities but disagree with forcing all to be dual certified.

Please consider my thoughts on the subject.

Sincerely,



Michele Dotta  
Special Education Teacher