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

Dear Mr. Buckheit,

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INDEPENDENT REGULATORY REVIEW COMMISSION RECEIVED

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PA. STATE BOARD OF EDUCATION

As a veteran teacher of 15 years in the State of Pennsylvania, I am writing to express my concern regarding Chapter 49-2. My concerns rest in the proposed rulemaking for certification for special education teachers at the secondary level. I can certainly understand the theory behind departmentalizing special education teachers into the "core academic subjects". In theory, it is a great idea. It gives the public the perception that all teachers are highly qualified, but in reality it makes us good test takers. Where this rule fails, is that is does not take into consideration, the professionalism that we as teachers exude to deliver the best quality of instruction to our students. Taking and passing a test doesn't make us good teachers, it makes us good test takers.

Prior to NCLB, I was allowed the flexibility to teach a variety of subjects in the learning support classroom. Not only was this a challenge, but also it was a refreshing change of pace to teach something new every few years. Now I am "stuck" teaching science because I had more science classes as an undergraduate than some of my colleagues and I was able to fulfill the requirements for a Bridge Certificate that states that I am highly qualified. Am I highly qualified now because I took a few science classes twenty years ago, or am I highly qualified because of my practical experience and professionalism to continue learning new strategies through collaboration with my peers in both special education and regular education?

In my opinion, because of Chapter 49-2, we are and will continue to lose good special education teachers to regular education. I also, believe this will have an affect on young teachers entering the job market. This will limit the teaching positions that they will be able to apply for in the future. If a person has the ability to pass the Praxis exam in one of the core subject areas, why would they choose to teach special education over regular education? I work with colleagues that have made the switch from special education to regular education classrooms. Several have stated that they would never go back to teach special education because of the abundant paperwork and discipline problems. So, I guess, Chapter 49-2 is helpful in driving good, highly qualified teachers out of special education and into regular education classrooms. Who will suffer now?

Good luck with achieving your goal of 100% grade level reading and math scores by 2014. Without good, professional, caring special education teachers, this is just another broken promise to student with disabilities.

Sincerely,

Christopher A. Gerhard