

Special Education Advisory Panel

Commonwealth of Pennsylvania
Pennsylvania Department of Education

2583

March 21, 2007

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

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Dear Mr. Buckheit,

Let us begin by thanking you and the State Board of Education for continuing to accept comments concerning the Chapter 49-2 proposed changes. We appreciate your concern in making sure that the changes are in the best interest of all who will be both directly and indirectly affected by them.

The Special Education Advisory Panel (SEAP) consists of members appointed by the Governor, or any other official authorized under State law to make such appointments, and is representative of the State population. It is composed of a diverse group of individuals involved in or concerned with the education of children with disabilities.

The members of the panel have discussed the proposed Chapter 49-2 teacher certification changes. It is our mission is to advise the state special education staff regarding the education of eligible students with disabilities. We continue to be concerned about the proposed changes and the direct and potentially negative impact on the field of special education and the 280,000+ students, as well as the detrimental impact on the general education population and professionals. Please consider the following points.

There are two major issues which have become a concern of many professionals within the Commonwealth. The first concern is the proposed teacher certification. The second concern is the requirement for all teacher preparation programs to endorse nine credits for educators to realistically teach students with exceptionalities. This requirement is minimal in its attempt to provide appropriate training for professionals.

The Elementary certification will create a problem both programmatically and fiscally to many of the school districts. The split in the elementary certification from currently K-6 to PK-3 and 4-8 will impose programmatic problems. Students performing above grade level will have teachers without the appropriate training to teach beyond the grade level. The advanced student will now be at a disadvantage. The struggling student will also be at a disadvantage as they advance across grades. The fiscal implications of these changes have also been expressed by supervisors, principals, and superintendents. This configuration stifles the ability to use faculty in a flexible way. For larger districts, this may be a temporary problem. For smaller districts, who, for example, hire a teacher for K-3 but later realize an opening at 4-8, not having the flexibility to move staff leaves classes without teachers. *Refer to Table 1- PAC-TE.*

<p align="center">Table 1 Comparison Certification Configuration in Pennsylvania</p>			
Grade Level	Present	Proposed	Change
Early Childhood	N-3	PK-3 rd Grade	Add Pre-Kindergarten This certification <u>required</u> to teach at this level.
Elementary	K-6	NONE	Eliminated Completely
Middle School	NONE	4 th – 8 th Grade	Added with <u>very broad</u> age range
High School	7-12	7 th – 12 th Grade	No Change
Special Education	N-21 (age range)	1. Spec Ed-EC 2. Spec Ed – Elem/Middle 3. Special Ed - Secondary	Adds grade/age bands to the certification. <u>All Spec Ed teachers must hold DUAL certificates.</u>

Teacher preparation programs will be impacted in extreme ways. Approximately, 5 years ago the State System of Higher Education was required to reduce program credit size to 120 credits and to expect graduation to be completed within four years. The proposed certification will impact these requirements considerably. Students would not be able to complete the certification program within the four year requirements without colleges and universities soliciting an exemption to the current requirements. Those not requesting exemptions may impact on the integrity of their programs and require alternative solutions. SSHE schools may exceed the 120 credit limit if there is a regulation or legislation that requires such.

The requirements from NCLB and later supported by IDEA in terms of highly qualified have not resulted in the real intent of the law. Are we truly generating more highly qualified teachers or just creating teachers who can pass the content PRAXIS tests? Do we really feel that someone who would attend a four year program and obtain content certification and one who takes the content test and passes are both truly highly qualified? Is it realistic to expect teachers who are genuinely pursuing a certification in Special Education to commit to extended time in order to be certified in all the areas they are required? For example, a teacher who is teaching students at the secondary level in an emotional support class which is considered the LRE for those students would need special education certification and the content certification of the instructed classes; this could mean 8-10 certifications for that teacher. This would require additional credits, expense, and additional safeguards to ensure compliance

The proposed elementary certifications will not be marketable across states. The contiguous states can not support the narrow certification requirements. Although our goal is to retain the teachers we produce, there are surpluses within certain categories. The proposed certifications will not facilitate the smooth transition that some students seek to be employed in other states. Recently, Texas has developed plans to move from their current narrow certification arrangement (similar to proposed new PA certification) to a larger span for

elementary education: what Pennsylvania currently has in effect. Many issues were identified as causes. Refer to Table 2 courtesy of PAC- TE.

State	ECE	Elementary	Middle	Special Education
Florida	Preschool	K-6th	5-9th	K-12
Georgia	P-5	4-8th	See Elementary	
Illinois	Birth – 3rd	K-9th		Endorsements
Maryland	Prek-3rd	K-6th	4-9th	P-12
Massachusetts	P-2nd	1-6th	5-8th	K-12
Michigan	ECE Endorsement	K-6th	6-8th	K-12 added to El or Sec Ed
Mississippi	Prek-3rd	K-3rd	4-8th	K-12 & K-8/Mild to Moderate & Severe
Nevada	None	K-8th		K-12 plus El or Sec
New Jersey	P-3rd	K-5th	6-8th	Dual
New York	Birth – Age 6	2-6th	5-9th	B-2; 1-6; 5-9
North Carolina	B-K	K-6th	6-9th	K-12
Ohio	P-3rd	None	4th-9th	K-12 Mild/Moderate or K-12 Moderate/Intensive
Oregon	P-4th	3-8th	5-10	Special Ed after content
South Carolina	K-4th	1-8th	5-8	K-12
Texas	EC-4th	4th – 8th	8th – 12th	K-12
Virginia	P-3rd	P-6th	6-8	P-12 or NK-12 ECE/Special Ed

Pennsylvania has 3,258 school buildings registered in the Department's School Grade configuration file. Refer to Table 3, courtesy of PAC-TE for building/grade totals:

Grades of Students Served	# of Buildings	# of Students
K-5 th	1,100	300,474
K-6 th	439	196,373
K-8 th	99	82,580
5 th – 8 th	79	65,572
6 th – 8 th	302	200,162
7 th – 9 th	27	26,104
9 th – 12 th *	444	445,797
10 th – 12 th	58	58,375

* Also includes a few 9th – 11th schools.

PDE Information from Harriet Dichter, Director – Office of Policy – December 2005

Nine (9) additional credits for the endorsed certification does not seem to be adequate in preparing general educators to meet the needs of all students as required by No Child Left Behind and supported by IDEA. The original crafters of the proposed recommendations, a group composed of administrators, teachers, parents, higher education professionals (general & special education) were very pleased when they wrote and strongly encouraged dual certification, both special education & general education. This was later dismissed as a penalty to some colleges and universities and has been reduced to nine credits hoping to adequately prepare professionals for the varied needs of all students.

The mandated dual certification for all special education teachers may especially discourage students from becoming secondary school special education teachers. Content certification plus certification as a special education teacher would require a minimum of ten (10) full-time semesters, as opposed to the typical eight (8) semesters. Special education teachers are already in short supply.

Students with moderate to severe disabilities would have teachers generically prepared to meet the individual needs of the students. Although we hope to create programs to ensure success in the general education curriculum, the reality is that some candidates are individually prepared to meet the alternative standards. The teacher preparation for these students becomes watered down and possibly nonexistent.

The disregard for current Pennsylvania regulations and court settlements, i.e. Gaskins and response to LRE has been heightened by the proposed certification regulations. As students are placed in the least restrictive environment (LRE) to the maximum extent possible with their non disabled peers, teachers need to be prepared to the fullest to meet those individual needs. Nine (9) credits to satisfy the special education requirements is significantly below what could be expected requirements. The legal issues that routinely face special education demand more teacher preparation in the area of special education.

As reinforced by information gathered by PAC-TE, the proposed changes will also impact how PA certifies middle school teachers. The Middle School certification is currently one that is not "earned" but involves content testing of PA certified teachers, most often those with elementary certification. Middle School certification (in Pennsylvania) will be something new and should require additional resources. If Pennsylvania is committed to quality middle level education it will require the teachers be prepared to work with young adolescents in addition to content preparation.


The timelines for implementation need to be adjusted in order to make the transition a reality. The task is to prepare well qualified teachers. There is the possibility to have a gap in "prepared" teachers until the new certification components are completed.

Finally, there are a minimum of 24 credits required after the Instructional I certification to become permanently certified. These credits could be instrumental in developing a more comprehensive system on connected credit requirements which could result in a certification that would have a deeper base for meeting the needs of the students served.

In conclusion, although the constituents represented on the State Special Education Advisory Panel are broad, the commonality for all is the concern for students. Students, regardless of their abilities, deserve an appropriately certified professional to meet the unique needs of the students. Adjusting grade levels within the certification framework may not culminate in the desired end results. Grade level certification areas remain K-6 and 7-12. In general education, with the special education verification maintaining its current configuration of N-21, develop a specialization and incentives for districts to utilize those specialized certifications.

Thank you for your time and consideration of our thoughts. Please feel free to contact Dr. Gina Scala, Dr. Geralyn Arango or me for further detail and/or clarification.

Sincerely,



Mike Burk
Chair

cc: John Tommasini, Bureau Director