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November 27, 2006

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

Dear Mr. Buckheit:

As Chapter 49-2 enters the "public comment" period, I would like to express concern about the section of the regulation copied below:

Taken from 49.13: The evaluation by the Department will provide assurance that, on or before January 1, 2010, all teacher education programs will require at least nine credits or 270 hours, or an equivalent combination thereof, regarding accommodations and adaptations for students with disabilities in an inclusive setting. Within the content of these nine credits or 270 hours, instruction in literacy skills development and cognitive skill development for students with disabilities shall be included, as determined by the institution.

The ideal way to enhance the preparation of teachers regarding "accommodations and adaptations for students with disabilities in an inclusive setting" is to define the expectations for what all teachers should know and be able to do relative to teaching diverse learners. This along with accepted measures of competence for teaching in "an inclusive setting" will improve all teaching and learning.

Defining hours, courses and credits does <u>not</u> guarantee that educators will be prepared to meet these academic needs. I would strongly urge that the PA State Board of Education consider the adoption of the INTASC Model Standards for Licensing General and Special Education Teachers of Students with Disabilities. Example to follow:

INTASC Principal #2: The teacher understands how children learn and develop and can provide learning opportunities that support the intellectual, social, and personal development of each learner.

Implications for students with disabilities: Both general and special education teachers understand that all children have similar patterns of learning and development that vary individually within and across cognitive, social, emotional, and physical areas. They recognize that children with disabilities may exhibit greater individual variation in learning and development than students without disabilities, and that a disability often influences development and functioning in more than one area. Teachers use knowledge of the impact of disabilities on learning and development to optimize learning opportunities for each student.

Adoption of these standards, along with careful consideration by teacher preparation institutions about how to effectively demonstrate competence for each of these Model Standards, will enhance the preparation of teachers who can provide meaningful accommodations and adaptations. Attempts to enhance teacher preparation in these areas by mandating courses and clock hours can only provide a flood of concerns about just what is the appropriate way to meet and document this section of the regulation.

More complete information on INTASC Model Standards can be found at the website below. INTASC Standards are one of the many projects of The Council of Chief State School Officers (CCSSO).

http://www.ccsso.org/projects/Center for Improving Teacher Quality/CD/web pages/documents/resources/Model%20Standards%20at%20a%20Glance.pdf

Sincerely,

Clythera S. Hornung

Cly thera Q. Harning



Commonwealth of Pennsylvania STATE BOARD OF EDUCATION

December 5, 2006

Dr. Clythera S. Hornung 616 Sunset Road Saint Marys, PA 15857

Dear Dr. Hornungi:

Thank you for your letter received by the State Board of Education on November 30, 2006 regarding the proposed Chapter 49 Certification of Professional Personnel regulations.

Your letter is considered official public comment. As such copies are shared with each member of the State Board of Education, the chairs of the House and Senate Education Committees and Independent Regulatory Review Commission (IRRC). Your letter is also considered a public document that may be publicly released upon request.

The Regulatory Review Act provides that notice regarding final regulations be provided to those who make official comment if requested. If you would like to receive a copy of the final-form regulation when it is submitted for final approval by the legislative committees and IRRC, please submit a written request to me at the address listed below.

Sincerely,

Jim Buckheit Executive Director

Cc: Members of the State Board Senator James Rhoades Senator Raphael Musto Representative Jess Stairs

Representative James Roebuck, Jr.

IRRC