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Sent: Monday, November 27, 2006 10:19 AM
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Subject: Chapter 49.2 comments

To: State Board of Education
 From: Sister Carol Anne Couchara
 (Chairperson of Education Department of Immaculata University)
 Date: November 27, 2006

The current Chapter 49.2 proposal will have a major impact on Immaculata University's certification program.

1. Over the past five years, Immaculata has graduated 274 students in the area of "elementary" and 21 students in "early childhood". An informal survey of our current elementary students asked "Given a choice, would you choose Early Childhood (pre-K through Grade 3) or Elementary/Middle (Grades 4-8, with a specialty in a middle level content area). The overwhelming majority selected "Early Childhood". Might this trend lead to a future shortage of Elementary/Middle teachers?
2. At Immaculata we already have one special education course in all our certification programs. We also integrate components of special education, including ESL instruction, throughout our program – e.g., students complete field experiences in special education settings as well as in urban settings, students develop modifications for special needs students to be included in all lesson plans. Counting up 270 + 90 hours dedicated to either special education or ESL is a logistical nightmare. Mandating three additional courses (2 in special education and 1 in ESL) is impossible in some of our programs – especially those in secondary content areas.

In addition, I believe the current Chapter 49.2 proposal has many unforeseen and unintended consequences. Among these are:

1. The replacement of Elementary certification with Elementary/Middle (49.85) exacerbates and creates hiring and staffing problems rather than helping to reduce or eliminate them. It complicates supply and demand of teachers rather than working to balance them. (The proposed designation of Elementary/Middle as Grades 4-8 with specialty in a middle level content area is very limiting for principals when assigning teachers). It creates problems for current teachers and for those students already in the "pipeline" leading to certification. (Shouldn't we have certified teachers qualified to teach in any grade in an "elementary school" – 1,100 schools in PA are K-5, 439 are K-6?)
2. The mandate (49.13) of adding 9 credits of special education (or 270 hours) and 3 credits of ESL (or 90 hours) can prohibit some certification candidates from being able to complete a program during a four-year college degree. Currently most student rosters are full, particularly in areas of secondary content certification. Education programs do not have the power to add credits to current degree requirements (ours is already set at 128). Adding four courses to a program adds a semester. (Education programs should be able to work special education content into existing courses.)

It is my belief that:

1. The current grade level assignments of instructional certificates (49.85) should be retained. For

example, Early Childhood Education should remain pre K-3 and Elementary Education should remain K-6.

2. The teacher induction process should be used to enhance the preparation of beginning teachers. For example, holders of the initial Elementary certificate should be required to schedule additional Special Education courses and experiences. Special Education teachers at the same career stage should be required to supplement their preparation in academic content.

Thank you for your consideration.
Sister Carol Anne

Sister Carol Anne Couchara, IHM, Ed.D.
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