



DEC 04 2006

November 27, 2006

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

Dear Mr. Buckheit:

Now that the final version of Chapter 49-2 has been published in the *Pennsylvania Bulletin*, I wish to express some concerns I have about the proposed regulations.

As a dean and a faculty member, I feel I have a very good perspective on what has worked well and what needs improvement in teacher preparation over the past 30+ years that I have been in higher education. First of all, I am concerned that we are eliminating elementary certification (K-6) to be replaced with two separate certifications, K-3 and 4-8. The 4-8 specialization gained from this change will make it difficult for teachers to deal with young students who many not have mastered K-3 skills or vice versa. Second, there is a real concern that the number of students certifying in K-3 will far outweigh those who select 4-8, which could eventually create staffing problems for elementary schools. Third, the separation of certification will limit the portability of PA certified elementary teachers who elect to teach outside of PA.

We have an excellent reputation in PA for training outstanding teachers. To best prepare our graduates for successful employment, the Universities will be pressured from students to offer both certifications to be completed in a reasonable period of time. This will be difficult to achieve without requiring many additional credits, resulting in higher cost and an extension of time to graduate. For those who teach in the SSHE institutions, this situation becomes even more stressful as programs are limited to 120 credits. Additionally, the new mandates related to "diverse learners" will in many cases require more courses, raising the question: what important skills need to be eliminated from other areas in order to include more emphasis in this area?

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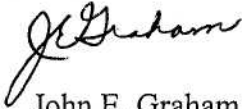
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Lastly, requiring dual certification for special education certification will most definitely exacerbate the current short supply of special education teachers, particularly due to the credit requirements for dual certification. Furthermore, as a dean, I am very much concerned about the availability of candidates whom I could hire with the expertise needed to teach in this area. Even now it is difficult to find qualified candidates; the new requirements will cause serious staffing issues.

I do appreciate the work that has been put into examining Chapter 49-2 in order to make improvements in teacher preparation that will ultimately benefit students in PA classrooms. However, I also feel that some of the mandates will generate more harm than good and I respectfully ask that you give further consideration to addressing some of the concerns I have addressed.

Sincerely,



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