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INDEPENDENT REGULATORY  
REVIEW COMMISSION

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Independent Regulatory Review Commission  
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Ladies and Gentlemen:

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?