



2003

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Mr. Kim Kaufman
Executive Director
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

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INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Mr. Kaufman:

Recently revisions have been proposed that will change the requirements for teacher certification; specifically, Chapter 49 regulations. I am writing to express my opposition to the proposed changes.

Studies indicate that there will soon be a shortage of people for teaching positions. Those of us involved in hiring are already observing this trend, and I fear that Chapter 49 will exacerbate the situation. However, even if the supply of prospective teachers will be abundant, the proposed revisions are educationally questionable.

From an educational perspective, the impact of this legislation may lead to the following:

1. Narrow the preparation of elementary teachers and lead to overspecialization. Any person who has ever taught or observed an elementary class knows the range of differences and abilities among students is diverse. Calibrating undergraduate training will reduce the ability of future teachers to apply differentiated pedagogy to all of their students.
2. The regulations may lead to a departmentalizing of disciplines at the lower grades. What we need is an integration, not specialization, of skills and knowledge.
3. Chapter 49 proposals will result in less flexibility in staffing. I have personally observed many talented teachers who have successfully moved from one grade to another in their careers. This may not occur if Chapter 49 is legislated.

Additionally, from a personnel perspective, I fear that the proposals will lead to a further shortage in special education teachers. We already face serious problems in this certification area. The new proposals may reduce our capacity to fulfill the "highly qualified" requirement of *No Child Left Behind*.

I respectfully request that you consider the impact of Chapter 49 on local school districts and urge you to disapprove the regulations. Thank you.

Sincerely,

Robert L. Urzillo, Ed.D.
Superintendent of Schools