

Buckheit, James**RECEIVED**

From: Couchara, S. Carol Anne [CCouchara@Immaculata.edu]
Sent: Thursday, November 30, 2006 10:41 AM
To: OOstatbd@psupen.psu.edu
Cc: jbuckheit@state.pa.us; IRRC@irrc.state.pa.us; hornung@pitt.edu; jflynn@velocity.net.
Subject: FW: Chapter 49.2 comments

DEC 5 2006

**PA. STATE BOARD
OF EDUCATION**

To Whom It May Concern:
 I sent the email below on Monday.
 Please consider this as an addendum:

The newly-proposed certification level is Elementary/Middle (grades 4-8). Early Childhood (Pre-K through Grade 3) remains the same (but would be required). The current Elementary certification (K-6) is proposed to be eliminated. My Administration asked me for the rationale for these proposed changes – I truthfully don't know how to answer their question. What even prompted this dramatically different idea? If approved, reciprocity with all states (except possibly Georgia) is gone, there is no match with the current basic education format in our state (most schools are K-5 or K-6), there is crossover between Elementary/Middle and Secondary (7-12) but none with Early Childhood.

Thank you for your consideration.

*Sister Carol Anne Couchara, IHM, Ed.D.
 Immaculata University
 Education Department, Chairperson*

From: Couchara, S. Carol Anne
Sent: Monday, November 27, 2006 10:19 AM
To: 'jbuckheit@state.pa.us'; 'IRRC@irrc.state.pa.us'
Cc: 'hornung@pitt.edu'; 'jflynn@velocity.net.'
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.

12/5/2006

RECEIVED
 2006 DEC -7 AM 10:51
 INDEPENDENT REGULATORY
 REVIEW COMMISSION

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.
Immaculata University
Education Department, Chairperson

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

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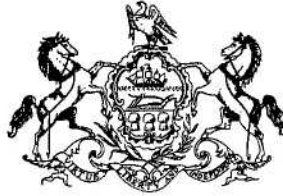
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Thank you for your consideration.
Sister Carol Anne

*Sister Carol Anne Couchara, IHM, Ed.D.
Immaculata University
Education Department, Chairperson*

2583



Commonwealth of Pennsylvania
STATE BOARD OF EDUCATION

December 5, 2006

Sister Carol Anne Couchara
Chairperson, Education Department
Immaculata University
1145 King Road
Immaculata, PA 19345 0702

INDEPENDENT REGULATORY
REVIEW COMMISSION

2006 DEC -7 AM 10:51

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Dear Sister Carol Anne:

Thank you for your letter received by the State Board of Education on December 5, 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,

A handwritten signature in cursive script that reads "Jim Buckheit".

Jim Buckheit
Executive Director

Cc: Members of the State Board
Senator James Rhoades
Senator Raphael Musto
Representative Jess Stairs
Representative James Roebuck, Jr.
IRRC