

Mr. Kim Kaufman.
 Director, Independent Regulatory Review Commission
 333 Market St., 14th floor
 Harrisburg, PA 17101
 December 4, 2006

INDEPENDENT REGULATORY
 REVIEW COMMISSION

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Dear Mr. Kaufman:

I am writing to oppose the proposed amendments to the State Board of Education's teacher certification regulations (Chapter 49-2) that are now before the Independent Regulatory Review Commission.

Specifically, I am opposing the grade level structures for the proposed certificates (Early Childhood, Pre K-3 & Elementary/Middle, 4-8) that would eliminate the current Elementary Education Certificate (K-6).

As one of many parents of children who attend a public school in Pennsylvania, I oppose the changes for the following reasons:

1. I believe that teachers working with children in the elementary grades should receive training in the widest developmental range possible.
2. The elementary certification split seems arbitrary. Grade 4 is developmentally very different from Grade 8, and I do not understand how those grade levels are represented in one certificate in the proposed structures.
3. I have heard from teacher educators that the split of Elementary Certificate into two proposed certificates may result in a shortage of qualified teachers prepared to teach in grades 4-6.
4. I have heard from school administrators that this split will result in staffing problems for schools that need K-6 flexibility. In my own child's elementary school, an excellent 2nd grade teacher was moved to a 5th to fill a staffing need. With the split such flexibility will not be possible.
5. If the changes are proposed in order to strengthen the early childhood education in Pennsylvania, I suggest that we pay greater attention to state-sponsored preschool programs, full-day kindergarten, earlier compulsory school age (currently 8 years), and/or smaller class sizes in grades pre k-2.

I highly recommend keeping the current Elementary Certificate (K-6) and adding a legitimate middle school certificate (6-8).

Sincerely,

Betsy Ragan

*1828 W. Pennsylvania St.
 Allentown 18104*

Betsy Ragan
 Allentown Public School Parent

cc: Jim Buckheit, Ex. Dir. State Board of Ed.
 Senators Patrick Browne, James Rhoades
 Representatives Karen Beyer, Jennifer Mann, Jess Stairs, James R. Roebuck, Jr.