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INDEPENDENT REGULATORY
REVIEW COMMISSION

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

DEC 04 2006

Dear Mr. Buckheit,

I am writing to express our concerns, once again, about the proposed changes to teacher certification in Chapter 49-2. While we appreciate the interest demonstrated in the proposals for meeting the needs of diverse learners, we believe that the structural changes demanded by the new requirements will effectively limit our ability to prepare excellent teachers for the state of Pennsylvania and the rest of the country.

Our first concern focuses on the elimination of the K-6 elementary certification and the proposed new certifications in PK-3 and 4-8. We see the following problems with this proposal:

- In principle, we believe that teachers need to be prepared to meet the developmental needs of children across the range of grades. In order to teach PK-3 effectively, they must be knowledgeable about the developmental needs and cognitive and social abilities of all children. Similarly, 4-8 grade teachers must know and be able to respond to the needs and abilities of younger children. No theory of development examines children in the age ranges specified by this certification designation, and no teacher training program could or should effectively teach one without the other.
- In practice, schools need teachers who can teach across grade levels. Shifting demographic needs, effective student groupings (including vertical grade groupings and looping practices), and the opportunities for teacher growth and development mean that teachers need to be prepared to move across grades within an elementary school. It is not effective to prepare teachers in ways that then limit their growth and their ability to meet the needs of the community and school within which they work.
- The 4-8 certification is also problematic on both principled and practical grounds. In principle, we believe that middle school teachers need subject area certification. As early adolescents begin to explore content in more depth, they need teachers who have a strong understanding of the structure, methods and content of their disciplines. In practice, providing undergraduates with coursework necessary for elementary certification and subject matter certification will be difficult, if not impossible for many teacher education programs, especially those at liberal arts colleges where students do

not major in education but have a range of other requirements to fulfill. (These are the very teachers who most clearly meet the “highly qualified” designation of NCLB.)

- The teachers we prepare teach in Pennsylvania but also around the country. The PK-3 and 4-8 certifications do not transfer well. We would point out that when the secondary social studies certification was replaced with Social Science and Citizenship certifications, Pennsylvania schools found that these certifications did not provide teachers prepared to meet their needs, nor could teachers transfer these certifications to teach in other states. The state has since returned to a single Social Studies certification. In the same way, the PK-3 and 4-8 certifications do not prepare teachers to meet the needs of either Pennsylvania schools or schools in other states.

We would recommend that the state consider alternative proposals that maintain the K-6 certification and allow students to specialize in PK-3 or 4-8 (the latter with content specialization).

Our second concern focuses on the requirement that all teachers must accumulate 270 credit hours in special education and 90 credit hours in ELL education. Swarthmore’s Department of Educational Studies has identified “instruction to meet the needs of individual learners” as one of its core values. We support the concept that all teachers need additional preparation to meet the needs of diverse learners, given current classroom expectations and student needs. However, we have the following concerns about the new proposals in this area:

- Requiring a certain number of credit hours does not guarantee that teachers will be prepared to meet the needs of students with disabilities or for whom English is a second language. No other requirement for teacher certification is stated in terms of hours – because we know that putting in the time does not equate with learning what teachers need to know.
- In small liberal arts institutions such as ours, students meet institutional distribution requirements, the requirements of their major, and the requirements for teacher certification. This kind of program prepares teachers who have a broad framework for understanding the world, are grounded in a particular field, and can integrate theory and practice in education. Adding a significant number of courses (or the equivalent hours) to these students’ programs will make it impossible for them to fulfill all of the requirements.
- Students who cannot fulfill certification requirements as undergraduates will not necessarily go on for graduate work through which they can get certified. The students who choose not to go on are often those from working class families and underrepresented minority groups. These requirements will, we believe, decrease the number of students we can prepare and will also decrease the number of students who choose to continue their preparation elsewhere. We will disproportionately lose teachers of color or teachers from lower classes for whom additional schooling is not an option.

We strongly recommend that the state define the expected competencies demonstrated by teachers who can effectively meet the needs of diverse learners. Schools and departments of education can then use these to develop the necessary programs to prepare teachers who have the knowledge and skills needed to address all students' needs.

Thank you for your consideration of these concerns.

Sincerely,

A handwritten signature in cursive script that reads "Lisa Smulyan". The signature is written in black ink and is positioned below the word "Sincerely,".

Lisa Smulyan
Professor and Chair