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# Riverside School District

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December 5, 2006

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

Dear Mr. Kaufman:

My purpose in writing is to express my opposition and that of my administrative staff's opposition to the proposed amendment to the State Board of Education's teacher certification regulations (Chapter 49-2) that are now before the Independent Regulatory Review Commission.

The regulations, if finally adopted, would make it even more difficult for us to appropriately staff our schools.

Our reasons for taking this position is that these regulations would create a workforce which lacks a "broad" preparation as elementary teachers, the inability to integrate curriculum in upper elementary grades, anticipated shortages in "properly" certified personnel, and lost flexibility in reassigning personnel in teaching assignments.

Finally, this piece of legislation does not reflect the essence of the term "highly qualified."

Thank you for your time and consideration.

Sincerely,



Salvatore F. Luzio, Sr.  
Superintendent  
Riverside School District

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