## Fleetwood Area School District

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Paul B. Eaken, Ed.D. Superintendent

December 6, 2006

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

Dear Mr. Kaufman:

We are writing to express concern about 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. These regulations, if finally adopted, would make it more difficult for us to appropriately staff our schools.

Our greatest concern is the staffing of our special education programs. Currently, special education teachers receive K-12 certification. In Fleetwood, we have had great difficulty staffing our secondary and life skills support special education classrooms. Under the current system we have had the flexibility to assign special education certified teachers to these classrooms based upon our staffing needs. In the past few years, we have had six special education teachers (four of whom hold special education and elementary education certificates) who initially preferred teaching at the elementary level but were assigned to secondary special education positions due to the district's need. All of these teachers have become very successful at the secondary level. The proposed requirement that special education teachers also be certified for a particular age range (specifically early childhood, elementary/middle, or secondary) will greatly impact our ability to find appropriately certified special education teachers to meet our programming needs.

Although we have not experienced any difficulty staffing elementary positions, we are concerned that a similar problem may arise with a limited scope of certification for elementary teachers under the proposed regulations. We are also concerned that further specialization in the certification of elementary teachers will interfere with our efforts to provide a seamless curriculum throughout the elementary grades. New teachers hired under the proposed regulations will not have the background and experience in both the early or upper elementary grades that they presently have upon graduation.

Based upon these concerns, we urge you to oppose the adoption of the proposed Chapter 49-2 regulations in their current form.

Sincerely,

Paul B. Eaken, Ed.D. Superintendent

Bethany L. Bosold, Ed.D. Assistant Superintendent

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