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Bucknell

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**PA. STATE BOARD
OF EDUCATION**

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

Dear Mr. Buckheit:

I am writing to follow up on my April letter concerning the State Board of Education's effort to revise Chapter 49. These revised comments are offered during the 30 comment period following publication of the revised guidelines in the Pennsylvania Bulletin. Similar to my last letter, my concerns focus on (1) changes to Section 49.13 related to the required hours/credits of instruction on accommodations and adaptations for students with disabilities in an inclusive setting and the instructional needs of English language learners and (2) changes to Section 49.85(b) with respect to the elimination of a general K-6 elementary certification.

With respect to the first issue I have spoken broadly with other teacher educators across the state and share their concern that adding hour requirements and credit requirements for education students in any area is a poor substitute for specifying actual competencies in these areas. I do believe that quality instruction related to accommodations and adaptations for students with disabilities is of central importance as is instruction regarding the needs of English language learners, however, mandating hours and/or credits will not insure that quality training will occur. Rather than specify hours, or courses, clear competencies should be defined so that colleges can design programs that will appropriately address those competencies. Simply adding hours does not guarantee that pre-service teachers will develop the necessary competencies and simultaneously makes graduation within a 4 year time frame more challenging. Again, I urge the committee to charge PDE to designate the required skills and competencies and allow the colleges to determine how these competencies will be met. Mandating hours and credits runs counter to the principles of good policy development and is likely to alter the rest of the curriculum in ways that will be potentially damaging to the quality of future teachers and even may place some high quality teacher training programs in jeopardy. This is certainly the case at Bucknell and at other small liberal arts colleges who have small programs but train some of the most talented college students in the state.

I would also like to voice concern about eliminating the current K-6 certificate. I am concerned that eliminating this certificate will create a shortage of teachers in the higher grades and would also make it difficult for teachers to cross state borders. Shortages would result from large numbers of students selecting the K-3 certificate over the 4-8 certificate. Even within a K-6 program most Bucknell students are more interested in the earlier grades. In addition, crossing state boundaries would be challenging because most states on the eastern seaboard still adhere to the traditional K-6 designation. Instead, I would endorse a core certificate with a pre-K to K or grade 7-8 add on. Portability is particularly salient for a college like Bucknell with large out of state enrollments.

Thank you for openness to receiving feedback on this important topic.

Respectfully,

Abe Feuerstein, Ph.D.
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