

Buckheit, James

From: Doris O'Shea [d.oshea@comcast.net]
Sent: Thursday, December 07, 2006 12:28 PM
To: j buckheit@state.pa.us
Cc: Doris O'Shea
Subject: Proposed Regulatory Changes

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INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Mr. Buckheit,

It is my understanding that publication of the proposed regulatory changes to Chapter 49 (i.e., Certification of Professional Personnel) has been disseminated and is open to public comments. I have been a Special Educator for more than 34 years, the past 12 years spent as a faculty member of a tertiary teacher training entity in Pennsylvania. Please find, below, my comments on this important issue to the Commonwealth of Pennsylvania.

As I understand, the proposal would overhaul Pennsylvania's teacher certification system by creating new certificates for early childhood (pre-K through grade 3) and elementary/middle (grades 4 through 8), and replacing the current K-12 special education certificate with three new certificates that require all special education teachers to be dually certified in the academic area for their grade level: special education-primary (pre-K through grade 3), special education-elementary/middle (grades 4 through 8) and special education-secondary in a core academic subject (grades 7 through 12). Among other changes, the proposal also would require all teachers to receive training in working with diverse learners during preparation programs, induction programs, and ongoing professional development.

After reading the April 2006 report: "A Rising Tide: The Current State of Higher Education in the Commonwealth of Pennsylvania," I believe it is imperative to expand the use of State statutes and regulations to promote standards-based reforms that are reshaping pre-K-12 education in the Commonwealth. As an important precedent for state lawmakers interested in a similar reshaping of higher education across the Commonwealth, I believe it will take regulations enacted by the General Assembly to delegate to Commonwealth agencies the authority to reshape Pennsylvania's system of higher education faculty involved in teacher training entities. It makes little sense to me to require the "highly qualified" status of pre-k-12 teachers in Pennsylvania, as promulgated by State and federal regulations, when teacher preparation, induction program, and/or ongoing professional development faculty, themselves, may not have the knowledge and skills to prepare and develop teachers. (At the tertiary level, "highly qualified" degree-granting faculty status must be represented by a discipline degree--not by a certification that can be obtained at the undergraduate level. A relevant degree is necessary to ensure that tertiary faculty have the knowledge and skills required to prepare and support the training and professional development of the Commonwealth's teacher cadre working with diverse learners.)

Thus, I believe Chapter 49 should be reauthorized (and aligned with degree granting, teacher certification, and Act 48 requirements) to ensure that tertiary faculty providing teacher training and development are "highly qualified" in their disciplines. Faculty providing university and/or college undergraduate Special Education teacher preparation programs should be mandated to have at least a Master's degree in the Special Education discipline (i.e., in order to provide preparation coursework and grant Special Education degrees at the undergraduate level). Additionally, faculty involved in university or college Special Education graduate degree granting programs should be mandated to have, at the minimum, a terminal degree in the Special Education discipline (i.e., in order to provide coursework and grant Special Education degrees at the Master's level and above).

I hope the General Assembly would not be persuaded by the argument that "inclusion of special need learners in general education" allows anybody with a certification or degree in any aspect of education or "related area" to plan and implement Special Education tertiary coursework. (I am not referring to "related services" as defined under the IDEA and Chapter 14.) Mandating that tertiary faculty teaching undergraduate or graduate level Special Education coursework have necessary academic qualifications (i.e., evidenced by a relevant degree in the Special Education discipline) underscores the provision of a free, appropriate education to diverse learners, including children and youth with disabilities.

In order to ensure a FAPE and the provision of highly qualified teachers, I am requesting that Chapter 14, Act 48, and Chapter 49 regulations raise the Special Education teacher-preparation and development standards by mandating, monitoring and ensuring the "highly qualified" status of Pennsylvania tertiary faculty at degree and certification granting programs. Without standards being regulated and closely monitored (e.g., teacher preparation and development coursework is provided by whom??.does the tertiary faculty demonstrate the knowledge and skills, themselves, required to prepare and develop teachers??...), the issue of highly qualified teachers from pre-k-12 is moot.

Thank you for the opportunity to provide my opinion. Please feel free to contact me at the above e-mail address if you require further information.

Respectfully submitted,

Dorothy J. O'Shea, Ph.D.
Professor of Special Education