



Department of Curriculum and Instruction

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December 10, 2006

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

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PA. STATE BOARD  
OF EDUCATION

Dear Mr. Buckheit:

On behalf of the elementary and secondary education faculty at Penn State University, which includes elementary education faculty at Altoona, Berks, and Lehigh Valley, as well as elementary and secondary education faculty at University Park, I am submitting comments concerning proposed revisions to teacher certification (Chapter 49-2).

Please know that our faculty is committed to educating high quality teachers, and believe it warrants careful thought and research-based attention. As you are aware, we have highly regarded programs. Our faculty members have national and international reputations for their research in education. School districts throughout the state and the nation actively seek to hire our graduates. The College of Education is consistently ranked among the top programs in the country. Our teacher education programs are accredited by the National Council for Accreditation of Teacher Education (NCATE), and our elementary education program is nationally recognized by the Association for Childhood Education International (ACEI). In addition, our Early Childhood Education program is recognized by the National Association for the Education of Young Children (NAEYC).

Therefore, we are pleased that you and your colleagues are revisiting teacher certification in Pennsylvania by moving this important issue to the forefront of state-wide discussions in education. We believe we would be remiss if we did not bring our specific concerns and suggestions about the recent proposed certification changes to your attention.

First, while some of the elements of the proposals appear to be driven by the NCLB Act and the Gaskin case, the problem for which the suggested changes present a solution is not clear to us. Further, we note a lack of empirical evidence backing the proposed changes. Therefore, we are unclear what motivates these specific proposals. In particular, many of us are concerned that the changes to elementary education certification might

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have detrimental consequences for children, for pre-service and in-service teachers, and for Pennsylvania's elementary schools. For example, the apparently arbitrary split with the certification in PK-3 and 4-8 strands will:

1. Make teacher education for grades 4 – 8 ineffective. There are no clear guidelines or rationale for this unusual grouping of grade levels, which means that beginning teachers will need to be prepared in elementary school (all subjects, child development) and specialized content areas. Because of this, we are concerned that: a) this will Reduce elementary school teachers' understanding of the broad range of child development and elementary school curricula. Eventually, this will reduce the quality of instruction that students in grades 4 to 6 will receive, and b) there will be a lack of interest among teacher education students for grades 4-6 (which is currently an issue in Ohio).
2. Limit the opportunities for our students to gain employment in K-6 schools.
3. Potentially restrict school administrators' abilities to organize their faculty to accommodate changes in school demographics. While there are provisions in the law allowing administrators to make exceptions, this could be burdensome and also contradict the goals Ch. 49-2 establishes for highly qualified teachers.
4. Negatively impact the 'whole school' philosophy of professional development school experiences.

**Because of these potentially detrimental effects, we would propose retaining the current N-3 and K-6 certificates, and suggest adding a middle school certificate (5-8). The state could use staffing guidelines (CPSGs) to encourage school districts to hire N-3 certified teachers in the primary grades and 5-8 certified teachers for middle schools. Research studies could be conducted to determine what fosters high quality teaching in each of these areas, and future decisions about certification and teacher education could be based on these studies.**

We agree that preparing teachers for increasingly diverse classrooms, including classrooms with special needs students, is extremely important. However, because of the number of credits already required for a bachelor's degree and initial certification in teacher education, **we encourage you to make the additional requirements for 'adaptations and accommodations,' and for 'English language learning' part of the requirements for Instructional II certification.** Some pre-service teachers may be able to meet some of the requirements in their initial certification programs; however, the added flexibility would mean that initial teacher certification could still be completed as an undergraduate degree program. The alternative may be to relax the 120-credit recommendation and recognize that teacher education will require a five year program.

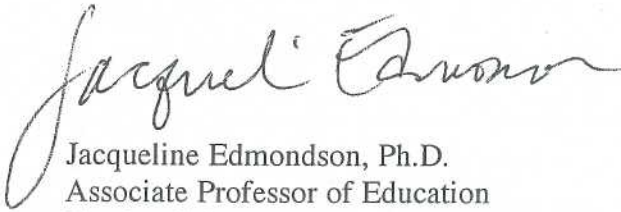


Finally, institutions of higher education will need time to make curricular changes to programs and to have these changes approved through university systems. We believe 2014 is a more realistic date to require any program changes to be in place.

While we appreciate the pressures that PDE faces with regard to NCLB, IDEA, and the Gaskin litigation, we suggest caution trying to anticipate these continuously evolving policies. Rather than moving too quickly toward apparent but untested solutions to ill-defined problems, we see this as a time for careful deliberation among those interested in Pennsylvania public education in order to design and implement research on alternative approaches to teacher certification within the Commonwealth. Toward this end, we are willing to engage in pertinent research with the PDE and the public schools in the state. We also hope that information included in the "Training America's Teachers Commission" will inform decisions at hand, particularly the commission's emphasis on the important role PDS experiences play in teacher education. We recognize this as an opportunity to bring positive changes to our state and for Pennsylvania to demonstrate educational leadership for the nation.

We welcome the opportunity to discuss these concerns and possibilities further with you.

Sincerely,

A handwritten signature in cursive script that reads "Jacqueline Edmondson". The signature is written in black ink and is positioned above the typed name and title.

Jacqueline Edmondson, Ph.D.  
Associate Professor of Education  
Teacher Education Coordinator  
(Elementary and Secondary Education Programs)