



BRYN ATHYN COLLEGE

December 11, 2006

Independent Regulatory Review Commission
 333 Market Street, 14th Floor
 Harrisburg, PA 17101-033

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 INDEPENDENT REGULATORY
 REVIEW COMMISSION

To Whom It May Concern:

I hope it is not too late to add my voice of concern to the Chapter 49-2 legislation that has recently been published and is now open for public comment. I represent the Bryn Athyn College which is a small religious college whose education program primarily prepares teachers to teach in the private elementary schools associated with our faith. Though we do not have state certifying status, our program works in conjunction with nearby Holy Family University to provide an education program that currently qualifies students for state certification. I fear this proposed legislation puts our program in jeopardy. In general I agree with the numerous concerns outlined by PAC-TE. I believe you have already seen their list so I won't re-create here for you again, but I would like to highlight the areas of concern that stand out to me and my institution.

I would like to preface my remarks by acknowledging that I whole-heartedly agree with the intent that is obviously behind these recommendations, but sincerely question their ability to actually deliver a better education to our children. I agree that our teachers need to be better prepared at meeting the diverse needs of students, but I do not believe that mandating course hours in special education will accomplish that goal as well as establishing observable and measurable competencies that could be evaluated during the observation component of the state certification requirements. Creating competencies would allow programs to integrate the skills into methods courses and provide more flexibility in meeting the standards the bill seeks to establish. Course hours does not necessarily assure that teachers will have the skills. The bill addresses the need for our future teachers to be more proficient in differentiating instruction in their regular coursework; it seems to me that a good place to start is by modeling how to do that in the students' own education program.

Of even greater concern to me is doing away with the K-6 certification. Breaking up our elementary degree to PK-3 and 4-8 certification seems to be in **direct**

conflict with the spirit behind the recommendation that all teachers be dual certified in special education. Teachers need to meet the needs of diverse abilities in their classrooms. Fourth grade teachers will have emerging readers/mathematicians in their classrooms and third grade teachers will have gifted ones. If we adequately prepare teachers to meet this diversity they WILL be capable of teaching the spectrum of PK-6 anyway, so why not let their career opportunities allow for that? School administrators need the flexibility of being able to move teachers to different grade level both to address changing enrollment as well as teacher burn out.

I have worked with education students long enough to know that when they first start to look at a career in teaching the vast majority of education students want to work with primary age students. Middle school students can be intimidating. It takes gentle nudging and opportunities to work with middle school students to build an education students' confidence. I am afraid that if this bill passes we will suffer from a shortage of teachers who would seek the 4-8 certification. The problems with certification transferring to others state will additionally exasperate the problem.

In conclusion, I believe the chapter 49-2 proposals are not in the best interest of our education students and certainly not in the best interest of the students they will teach. These proposals will create more problems than they will fix.

Sincerely,

Kay R. Alden
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Kathy Cooper

From: Alden, Kay [Kay.Alden@brynathyn.edu]
Sent: Tuesday, December 12, 2006 10:14 AM
To: IRRC
Subject: Chapter 49-2

Please consider the attached message as you consider passing the chapter 49-2 legislation.

Kay R. Alden

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"Endeavor to bring forth fruit"

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