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INDEPENDENT REGULATORY
REVIEW COMMISSION

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State Board of Education
Dr. James Fogarty
Chapter 49-2 Chairperson
333 Market Street
Harrisburg, PA 17126-0333

Dear Dr. Fogarty:

As we approach the mid-point in the public comment period for Chapter 49-2, please consider these comments on this pending regulation and its impact on teacher education. As a group that represents teacher educators in Pennsylvania, we believe that there is always room for improvement in teacher preparation. We are anxious to assist in the implementation of changes that will improve teaching and thus enhance learning by school students who are enrolled in basic education.

Chapter 49-2 will have an enormous impact on teacher preparation in Pennsylvania. We have provided you with information about our concerns and what we believe are the unintended consequences. We would like to suggest some

compromise approaches to some of the most worrisome portions of this regulation now under consideration.

1. . . .the grade level limitations shall be the following:

Early childhood (prekindergarten, kindergarten grades one through three or ages 3 through 8).

Elementary/Middle (grades four through eight or ages 9 through 14). Elementary/Middle certificates permit instruction in any subject in grades four, five and six and in a core academic subject or subjects in grades seven and eight.

Suggestion:

There is great value in having teachers specially prepared to meet the needs of early childhood and likewise, the needs of preadolescents. However, there is a body of knowledge that all teachers should have in order to meet the needs of elementary students. A K-6 or 1-6 certification for elementary grades with a specialization in either Early Childhood Education or Middle-Level Education will provide better prepared elementary teachers. The specialization could be part of the initial preparation or part of the mandated post-baccalaureate twenty-four credits. Requiring the additional preparation, initially or post baccalaureate, will prepare teachers for all elementary students, increase the specialization in early childhood education and middle-level education, protect the portability of the Pennsylvania elementary certificate along with providing more flexibility in elementary teacher assignments.

2. all teacher education programs will require at least nine (9) credits or 270 hours regarding accommodations and adaptations for students with disabilities in an inclusive setting.

Suggestion:

Requiring courses and/or hours will not guarantee that educators will be prepared to meet the academic needs “of students with disabilities in an inclusive setting.” Consider the adoption of the *INTASC Model Standards for Licensing General and Special Education Teachers of Students with Disabilities* or similar existing standards/competencies. IHE’s can design offerings to meet these expectations.

The adoption should also require IHE's to provide evidence that each candidate has attained the skills and knowledge necessary to meet the competencies. Attempts to enhance teacher preparation in these areas by mandating courses and clock hours without definition can only provide a flood of concerns about just what is the appropriate way to meet and document this section of the regulation. Courses and/or hours based on standards/competencies will encourage meaningful approaches to preparing educators "regarding accommodations and adaptations for students with disabilities in an inclusive setting".

3. *Special Education/Secondary in a core academic subject (grades seven through twelve or ages 11 through 21).*

Suggestion:

Consider design of 7-12 special education certificates with middle-level content requirements. Secondary students who are functioning at grade level will be in inclusive classes with a general education teacher as the teacher of record. Secondary special education students not functioning at grade level will have a teacher with a 7-12 special education certificate with appropriate middle-level content expertise.

Fleshing out the complete details of these compromise suggestions will require collaboration and consultation. It is PAC-TE's intent to show that we believe that there are alternatives that can meet the basic intent of Chapter 49-2 while avoiding some of the concerns and unintended consequences that may result if the regulation is adopted in its current form. We stand ready to meet with the State Board to discuss these and other issues relating to Chapter 49-2.

Sincerely,

Clythera S. Hornung
President

cc: Mr. Jim Buckheit