2583



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

December 11, 2006

Dear Mr. Buckheit,

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DEPENDENT REGULATORY REVIEW COMMISSION 9801 Frankford Avenue Philadelphia, PA 19114-2009

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## DEC 2 6 2006 PA. STATE BOARD OF EDUCATION

4

I have begun my 14<sup>th</sup> year as professor of special education teaching at Holy Family University in Bucks County and Philadelphia, PA. In that time, I have had ample opportunity to see the effects of our current certification format for *Instructional I* certification. In my professional role, I teach several graduate courses in special education that lead to initial certification (CBP/HD). I teach many graduate students who, having received degrees and certification *Instructional I* in a secondary content area or in early childhood or elementary education alone without special education, are back seeking the certification in special education. The reasons for this are varied, but for many there is the realization that their initial certification program was incomplete in its preparation for educating the more than 65% of children with individualized education programs who have the general education classroom as their primary placement. To a person, these retuning teachers have said they were ill-prepared to effectively work with children who have disabilities and who are in their classrooms or who navigate the support systems offered through special education.

Based on my observations while visiting elementary education and special education classrooms and experiences as a university teacher, it is my position that teacher certification needs to be changed to meet the needs of all children. I applaud the efforts of the Pennsylvania Department of Education and the State Board of Education in putting forth proposed changes that I believe are necessary. I must admit, however, that I was extremely disappointed with the November 14, 2005 announcement disavowing the support for a required dual certification for all *Instructional I* endorsements for teachers in the areas of early childhood or elementary education. Despite self-congratulations from many teacher preparation programs on the overall quality of our teacher candidate graduates, Pennsylvania currently scores in the lowest quintile on accepted national rankings for inclusive classroom placements for all students with disabilities. The Gaskin agreement highlights that PA has failed to meet its obligations in light of the Oberti decision. It is my belief that required dual certification for all teachers, not just special educators, would have fundamentally changed teacher preparation for the good of all students and teachers.

My unease with any more weakening of the Chapter 49 proposal stems from multiple places. First and foremost is that the potential needs of children, especially those children with disabilities, are supplanted by the needs of institutions of higher education, which will face challenges because of required changes in certification. Despite my concerns over the past, and threatened continued, weakening of the proposed changes, I **support and encourage** the State Board of Education to retain the remaining provisions proposed to update Chapter 49. Specifically, I encourage you to maintain or strengthen commitment in these important areas:

1) Section 49.13(b)(4)(i). Require all undergraduate education majors to take 9 credits or 270 hours in how to teach students with disabilities and 3 additional credits or 90 hours in how to teach English language learners. The credit hour requirement is essential to assure that teacher preparation programs adhere to specific and measurable amounts of coursework related to educating diverse learners;

2) Section 49.16(d). Require school districts to provide induction activities for new teachers that "focus on teaching diverse learners in inclusive settings;"

3) Section 49.17(a)(7). Require school districts to ensure that all teachers take continuing professional education classes "focused on teaching diverse learners in inclusive settings;"

4) Section 49.62b. Add new areas for "program endorsement certificates" in assistive technology, assessment, autism spectrum disorders, curriculum modification, and gifted education. While this does not carry the weight of Instructional II certificates, incentives, such as these for advance practice in educating children are important

5) Section 49.83. To receive *Instructional II* (permanent) certification, all teachers must complete "six specific course credit requirements" within a total of 24 college credit hours. The State Board originally proposed that six credit hours would be required for teaching diverse learners in an inclusive setting. I strongly object to diluting the language around on-going course credit as it relates to educating diverse learners. The proposal can and should be fixed to restore the Board's original position of requiring 6 credits for teaching diverse learners in inclusive settings.

I applaud the State Board of Education and the PA Department of Education in taking the initiative in working on the necessary changes to teacher certification, especially as it relates to diverse learners.

Sincerely,

Brian Berry, Ph.D. Professor of Special Education School of Education Holy Family University 9801 Frankford Avenue Philadelphia PA, 19114

2