



# PARKLAND SCHOOL DISTRICT

*"Educating For Life"*

**Administration Center**

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December 11, 2006

Mr. Kim Kaufman, Exec. Dir.  
333 Market Street  
14th Floor  
Harrisburg, PA 17101

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 INDEPENDENT REGULATORY  
 REVIEW COMMISSION

Dear Mr. Kaufman:

We are writing to oppose the proposed amendments to the State Board of Education's teacher certification regulations (Chapter 49-2) that are now before the Independent Regulatory Review Commission.

The regulations, if finally adopted, would make it more difficult for us to appropriately staff our schools. In particular:

1. The split of the current K-6 Elementary Education Certificate into Pre K-3 (Early Childhood Education) and 4-8 (Elementary/Middle) will create an uneven pool of qualified teachers for our schools in Pennsylvania and result in staffing problems for districts that need K-6 flexibility. There will also be a shortage of quality middle school candidates.
2. The proposal would also require future teachers to choose a certificate before they have had the opportunity to experience the realities of teaching a range of age groups. Within the current K-6 program, students are able to identify grade level(s) of choice after a series of concrete practicum experiences. We believe the current K-6 certificate provides flexibility for students. This flexibility would be lost with the adoption of the new regulations.
3. The reality is that in a school district such as ours, we would want to interview and hire candidates that possess both certificates (K-3 and 4-8) so that we would have the flexibility to use these individuals in an elementary building setting, K-5. Otherwise, we would be locked into keeping hires in either K-3 or 4-8 assignments. This would be a tremendous limitation placed upon our school district. We would lose the current ability to be flexible in teacher assignments within an elementary building. In essence, as we grow and also have teacher retirements, we would lose our flexibility to appropriately staff.

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4. It also appears that the new regulations would make it very difficult for any teacher candidate to complete both certificates (which we would want them to possess) within a 4 year degree program. Therefore, if students need to go to school for more than 4 years to gain two separate certificates, it is likely that we could end up losing potential teachers from entering the field of education. The sheer cost of securing an education degree and the appropriate certificates in order to obtain a teaching position may discourage great candidates from choosing to be teachers.

In summary, we believe that the current certification standards in the Commonwealth of Pennsylvania are rigorous and comprehensive. We hire extremely talented teachers each and every year under the current certification regulations and therefore strongly believe that there is no need for this amendment. Furthermore, after careful review of the new regulations, and as an individual school district in the Commonwealth of Pennsylvania, there are many more downsides to the new Chapter 49 proposals and not enough upsides to warrant its support.

Therefore, we respectfully submit and strongly urge you to disapprove the Chapter 49-2 regulations.

Sincerely,



Louise E. Donohue, Ed. D.  
Superintendent



Pamela M. Kelly  
Director of Human Resources