

# Great Valley School District

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RITA S. JONES, Ed.D.  
District Superintendent

December 13, 2006

Mr. Kim Kaufman, Exec. Director  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101



Dear Mr. Kaufman:

I am writing to oppose the proposed amendments to Chapter 49 (Certification of Professional Personnel) that are now before the House and Senate Education Committees and the Independent Regulatory Review Commission. The specific revisions that concern us surround the elimination of the K-6 elementary certificate and the creation of new, separate certificates for grades pre K-3 and grades 4-8 certificate. In addition, we also are concerned about the requirement of all new special education certificate holders to hold a dual certificate in either pre K-grade 3 elementary certificate, grades 4-8 certificate or a subject area 7-12 certificate.

We are writing to you to oppose these changes for several reasons. Most importantly this amendment will narrow the preparation/knowledge base of elementary certificate holders at a time when teachers are expected to work with a broader range of performance in their classes. This revision will lead to departmentalizing disciplines at lower grades at a time when many curriculum experts are suggesting greater and more natural integration of content.

From a staffing point of view, it will result in less flexibility which may cause districts to add staff and thereby raise taxes to fund the additional staffing. In an era of shrinking resources and restrictions on budget growth, schools need more flexibility and permission to be more creative in how we staff our elementary schools. These proposed Chapter 49 changes will result in considerably less flexibility in how we assign staff within our schools. Ultimately, we feel that these changes will lead to shortages in upper-elementary certificated and special education certified teachers. As a district that strives to hire experienced and qualified staff, these proposed changes suggest a compromise in our hiring standards.

As a Superintendent in Pennsylvania for 20 years, and as a practitioner in the field of education for 35 years, I see these changes as detrimental to the education of our students of the Commonwealth of Pennsylvania. Rigor and relevance of coursework in pre-service education of our teachers is important and we applaud the emphasis on the development for a stronger knowledge base in the area of special needs students for all teachers. But the restrictive and narrowing focus of the proposed regulations moves us in the wrong direction for the future.

For all of the reasons cited above, we urge you to disapprove the Chapter 49-2 regulations.

Sincerely,

Rita S. Jones, Ed.D.  
Superintendent of Schools