



Association of
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 of Pennsylvania

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PA STATE BOARD
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Association of Independent Colleges and Universities of Pennsylvania (AICUP)
 Comment to the Pennsylvania State Board of Education
 December 13, 2006

The AICUP Board of Directors met on December 13, 2006 and voted to submit the following comments to the State Board of Education in opposition to proposed regulations for Chapter 49-Certification of Professional Personnel, in compliance with the provisions for public comments contained in the Pennsylvania Bulletin (vol. 36, No. 47, November 25, 2006). The Board opposes certain provisions of the proposed regulations and specifically requests changes in the following areas:

1. The AICUP Board opposes the proposed regulatory requirements regarding the number of hours of teacher preparation for diverse learners and English language learners. First, the AICUP Board believes that identifying a set number of hours will not help teacher educators meet the specific concerns of the SBE and the Department. Since the Department is still in the process of writing specific competencies and has yet to receive full input from the field, colleges cannot be expected at this point to construct programs of specific hourly duration to meet the as-yet undetermined competencies. The AICUP Board therefore opposes including hours as the basis for teacher preparation institutions' activities and review. However, if it is determined that the requirement is going to be hourly or credit driven, then the AICUP Board recommends that the State Board and Chapter 49 Committee examine the total number of hours currently in regulation. Further, the State Board should set a consistent standard based on the Chapter 31-*Higher Education General Provisions* so that institutions can meet the requirement either by choosing 9 credits for special needs learners and 3 credits for English language learners or 126 hours for special needs learners and 42 hours for English language learners or some combination of hours and credits. The regulations need to ensure that these standards be integrated flexibly into the curriculum as currently written.
2. The AICUP Board opposes the split in the current k-6 certificate. Teacher educators at our institutions have expressed concerns about the availability of teachers in the higher grades, the portability of the certificate, and the cost-benefit of increasing faculty and student specialization. A careful analysis of the impact of this provision is critical to determine any unintended consequences of this regulatory change.
3. The AICUP Board appreciates the State Board's effort to extend the implementation date; however, colleges and universities surveyed by AICUP have indicated that the timeline is still deficient. In light of this information, AICUP requests that the timeline be extended to May 2014 for program completers.

Members of AICUP understand the importance of these regulations and appreciate the State Board's and the House and Senate Education committees' willingness to carefully consider our recommendations for revision.

Contact person: Mary Young, Vice President for Government Relations, AICUP