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**Pennsylvania  
Partnerships for Children**

Joan L. Benso, *President and CEO*

Michael J. Breslin, *Chair of the Board*

116 Pine Street, Suite 430, Harrisburg, PA 17101-1244

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

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**PA. STATE BOARD  
OF EDUCATION**

Dear Jim:

I am writing to offer public comments on the State Board of Education's proposed revisions of Chapter 49, as published in the *Pennsylvania Bulletin* November 25. Specifically, we wish to express our support for several proposed changes in these regulations:

1. The realignment of the scope of certificates (Section 49.85(b)) based upon research on child development and learning needs is especially important. The proposed regulations will assure that future teachers (beginning in 2012) of children in prekindergarten through third grade will be prepared with more attention to the developmental needs of young children and with a richer repertoire of academic instructional skills. We anticipate that the result will be more children reaching fourth grade having experienced school success and with better literacy skills. The proposed certificate for elementary/middle school (grades 4-8) also recognizes the developmental needs of young adolescents for the first time. We proposed similar revisions when the State Board's Chapter 49 Committee was undertaking its most recent complete review of Chapter 49 and are happy to see them included here. These proposed changes put the needs of Pennsylvania's children ahead of the institutional convenience of universities and school districts. We applaud your decision in that respect. But we are mindful of those institutional needs and support the proposed provision for granting exceptions to school districts (Section 49.85(d)) and the lead time for universities to revise their programs. Similarly, we think it is sensible to require PDE to develop accelerated programs through which future early childhood teachers can obtain elementary/middle school certificates and *vice versa* (Section 49.86). We also support the Board's decision to make these changes prospectively and thus to "grandfather" current teachers' certificates.
2. As the student body grows increasingly diverse, the need for all teachers to be able to teach that diverse set of students in inclusive settings becomes more and more important. We support requiring future teachers to study accommodations and adaptations for students with disabilities and methods of teaching English language learners (Section 49.14(4)(i)) and further requiring school districts to make similar professional development opportunities available to current teachers (Section 49.17(a)(7)).

3. The proposed regulations also make some important changes with respect to teachers in pre-K programs that we urged the Board's Chapter 49 Committee and its Early Childhood Committee to consider. These include requirements that teachers in pre-K programs operated under contract with districts have early childhood certificates within five years (Section 49.85(e)); that school district professional development plans include services to teachers in contracted pre-K programs (Section 49.17(a)(8)); and that school district pre-K teachers be included in district induction programs (Section 49.16(a)).

Despite some comments you will receive, these are rational and appropriate changes in state policy that will benefit future generations of children without unduly burdening either teacher preparation programs or school districts.

We hope you will proceed to final rulemaking along the lines you have proposed.

Sincerely,



Joan L. Benso  
President and CEO