

**Buckheit, James**

**From:** Buckheit, James  
**Sent:** Thursday, December 14, 2006 3:35 PM  
**To:** 'Susan Harlan'  
**Subject:** RE:

State Board of Education  
 333 Market Street First Floor  
 Harrisburg, PA 17126 0333  
 December 14, 2006

RECEIVED  
 2006 DEC 15 PM 2:25  
 INDEPENDENT REGULATORY  
 REVIEW COMMISSION

Dear Ms. Harlan:

Thank you for your letter received by the State Board of Education on December 6, 2006 regarding the proposed Chapter 49 Certification of Professional Personnel regulations.

Your letter is considered official public comment. As such copies are shared with each member of the State Board of Education, the chairs of the House and Senate Education Committees and Independent Regulatory Review Commission (IRRC). Your letter is also considered a public document that may be publicly released upon request.

The Regulatory Review Act provides that notice regarding final regulations be provided to those who make official comment if requested. If you would like to receive a copy of the final-form regulation when it is submitted for final approval by the legislative committees and IRRC, please submit a written request to me at the address listed above.

Sincerely,

Jim Buckheit

Executive Director

-----Original Message-----

**From:** Susan Harlan [mailto:SHarlan@po-box.esu.edu]  
**Sent:** Wednesday, December 06, 2006 7:57 PM  
**To:** j buckheit@state.pa.us; IRRC@irrc.state.pa.us  
**Cc:** Susan Harlan  
**Subject:**

Dear Mr. Buckheit,

As the President of the Pennsylvania Chapter of the National Association for Early Childhood Educators (PA- NAECTE) I would like to respond to the concerns expressed by the organization PAC-TE. Many of the members of PA- NAECTE are also members of PAC-TE but we do not share their concerns about Chapter 49-2. We believe that the concerns listed on the attached document have arisen from a concern about the challenges of change not from a concern for what is best for children. I urge you to read our response to their concerns.

The American Association of Colleges for Teacher Education (AACTE) which is the national organization under which PAC-Te operates, has urged teacher preparation institution to create stand alone Early Childhood Education (ECED) certifications and urges states to move away from having ECED imbedded in Elementary Education. Their recommendation is based on the knowledge that ECED is a distinct discipline and not a division of elementary education. Other professional groups that share this opinion are:

• Association for Childhood Education International (ACEI)

- The National Association of State Boards of Education (NASBE)
- The National Association of Elementary Principals (NAEP)
- The National Education Association (NEA)
- National Association of Early Childhood Specialists at State Departments of Education (NAECS/SDE)
- The Association for Supervision and Curriculum Development (ASCD)
- The American Educational Research Association (AERA)
- The National Association for The Education of Young Children
- The Division for Early Childhood of the Council on Exceptional Children (DEC/CEC)
- Society for Research in Child Development

The Early Childhood community in Pennsylvania would welcome the opportunities that would come with a change in certification. We believe that well educated Early Childhood teachers will enable our state's children to reach their potential in literacy, math and social skills. We know that Early Childhood is where we must begin if we are to truly "Leave No Child Behind". It is for this vital work that we need more and better-trained Early Childhood educators.

We believe this can best be accomplished by requiring the ECE teacher to receive extensive education in both Special Education and English as a second language. Early Childhood teachers are among the first professionals to detect and teach children with developmental disabilities. We are the teachers who first express our concerns to parents. It is the Early Childhood teacher who works to support the parents as they seek diagnosis, community resources and learn to become strong advocates for their child. We are also many times the first English speaking adults to spend time with many young children. We need the expertise to help these children find their place in our school communities.

Yes, it will be a challenge for us to integrate special education and ESL into our classes and programs but it is a challenge that will be well worth our time and energy because we believe it will benefit our students as well as Pennsylvania's youngest children. We have long recognized the economic benefits of early intervention. Will this be difficult within a four year degree? Absolutely, but our children deserve no less!

We fear that colleges that do not presently have ECE programs will either push down the Elementary curriculum they have or merely add a Preschool course. We know that we will need to work with these colleges to ensure that the programs they develop truly prepare students for the entire birth to age 8 range.

Thank you for your time and your support of young children.

Susan Harlan

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"Our challenge is not be prepare children for schools but schools for children." Docia  
Zavitkovsky