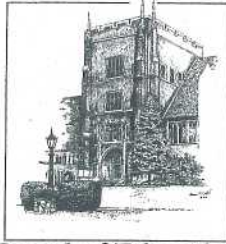


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MERCYHURST COLLEGE

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PA. STATE BOARD  
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TO: Members of the State Board of Education

FROM: Faculty of the Education Department at Mercyhurst College

RE: Written Public Comments on Proposed Amendments to Chapter 49

DATE: December 14, 2006

We appreciate the opportunity to comment on the proposed Chapter 49 amendments. By our estimations, the certification model proposed by Chapter 49 will fragment teacher training programs, exacerbate teacher shortages in high-need areas, raise ethical considerations about what it means to be “qualified”, extend training programs and education students beyond their financial means, and limit the ability of school districts to utilize staff in a flexible manner.

Topic #1: Fragmentation of teacher training programs:

On the surface, Chapter 49 proposed revisions reorganizes Pennsylvania’s teacher certification system to “recognize the different stages of child development”. This assumes all children reach developmental milestones at the same time. Through our experiences as parents, teachers, and researchers, we know this is not true. Individual children develop at various rates and with various degrees of strengths. We need to recognize this and equip future teachers with the skills to address developmental variations in their classrooms. The proposed Chapter 49 teacher certification system allows little, if any, overlap of certification. We believe this will cause fragmentation in

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teacher training programs, create less flexibility in staffing schools, and place barriers between teaching staff. Additionally, we believe the creation of the elementary/middle level certification will create and exacerbate teacher shortages primarily due to the course requirements leading to such certification.

Topic #2: Exacerbation of teacher shortages in high-need areas:

The proposed amendments do little to alleviate the shortage of special education, math, science, and English as a second language teachers. Under such a system of certification proposed by the amendments to Chapter 49, smaller districts would require some teachers to be double and triple certified to meet the needs of their children from kindergarten through middle school. Again, such certification categories as proposed fragments staff and may in fact create teacher shortages, particularly in special education.

Topic #3: Ethical considerations of qualifications:

The history of the proposed changes comes from parents and parent advocacy groups. Initially, there was a call for all teachers to be dual certified in a grade or subject area and special education. This has been scaled back in the proposal now in consideration. As a staff, we applaud the concept behind having all teachers trained in working with a diverse student body including children with needs resulting from disability and language differences. We are concerned, however, that a few classes in special education does not prepare a person to be qualified to teach special education in isolation. We must not see the course requirement in special education/disabilities/inclusive practices as meeting the needs for highly qualified special education teachers.

At Mercyhurst College, we recognized the need for all teachers to have an understanding and gain skills in meeting the needs of children with diverse learning styles. We have long had courses addressing disabilities and inclusive practices required for all teacher candidates. Chapter 49 proposals would require that all teachers receive four classes or up to 360 hours of instruction in meeting the needs of diverse learners. Again, we applaud the requirement that all teachers have training in the education of diverse learners but we are concerned in two respects. First, is our concern that many teacher candidates will not be able to fulfill these requirements within a traditional four-year program. The added time and cost may discourage some from entering the teaching field. Second, and of particular concern, is the possibility that these requirements may create the perception that future teachers can meet the unique needs of diverse learners in the isolation of their classroom. The 270-hour requirement addressing the education of children with disabilities cannot replace the use of well-trained teachers with expertise in the education of children with disabilities. Ninety hours of training cannot make all teachers qualified to address the needs of children with limited English proficiency. We would hope that the intention of these requirements in the proposed Chapter 49 amendments are not viewed as a “quick fix” for the shortage of qualified special education teachers and teachers of English language learners.

Specific to English language learners, we recommend the addition of a new section to Chapter 49 to create a full certificate for English as a Second Language as a subject area. Current requirements for ESL teachers specify only that they gain approval as an ESL Program Specialist and have certification in another area. The difficulty with the present requirement is that there is no encouragement for ESL teachers to gain more

than the minimal training for working with English language learners. As a result, there is little inducement for development of a strong pool of teachers with significant expertise in teaching ESL. Another difficulty is that teachers who already have licensure for teaching ESL from another state are not able to enjoy full reciprocity, since Pennsylvania does not recognize ESL as a certification subject area. Even though these out-of-state teachers may be given temporary opportunities to teach in Pennsylvania, their ESL licensure does not put them in a position to gain the Instructional II certificate.

Topic #4: Financial implications for teacher training programs and education students:

As stated earlier, but as point of emphasis, we are concerned that the addition of course work would have adverse financial implications for education students and teacher training institutes. First, here at Mercyhurst College, all students are required to complete a rigorous "liberal arts" core. We feel that having such a core requirement not only prepares our teacher candidates to be better teachers, but better citizens. Some institutions may reduce their core requirements for education majors resulting in teacher candidates who can fulfill "graduation" requirements but may be less prepared because of the lack of core course work. Is this what we really want?

Secondly, some teacher training programs may choose to close their doors because of the lack of qualified staff available to teach courses in disabilities and ESL. Here at Mercyhurst College, we have projected the addition of two full time staff to meet the requirements as proposed by the Chapter 49 amendments. But, we also recognize that if our student enrollment decreases, we may loss a highly successful undergraduate program. For a small college, we graduate a fairly large number of students with teacher certification. In 2006, 105 students graduated with teaching degrees, comprising 21% of

the graduation class. We believe we have a program second to none and have worked to improve our program year after year.

Topic #5: Limitations placed on school districts in determining staffing flexibility

Studies from both the national and state level have recognized the problems urban and rural school districts have in attracting and retraining qualified teachers. We believe the provisions of Chapter 49, as proposed, will not address the needs of small, rural districts but exacerbate an already critical problem. Imagine a small district where one special education teacher is employed to provide services to children at the elementary level. Under the proposed Chapter 49 amendments, this teacher would have to hold certification in early childhood education, elementary/middle school education, and special education. Given a normal track of course work at Mercyhurst College, it would take five years and two student teaching courses to earn the appropriate certifications. Given this, would such a teachers earn more than the second grade teacher or sixth grade teacher holding single area certifications? The special education teacher would have spent an additional \$30,000 on his/her education.

Given the above, we would like to propose some alternatives to the proposed amendments to Chapter 49. First, retain the current certification classifications. We find no compelling research to suggest a change in certification categories, as proposed in the Chapter 49 amendments will increase the quality of teachers. Second, require dual certification for special education teachers. At Mercyhurst College, all our graduates in special education also choose to major in early childhood or elementary education. We have few that choose to major in special education and a secondary subject area and are attempting to address this through scholarships and more personalized attention in the

program. Finally, require all teacher candidates to have no more than two survey classes (180 hours) covering the education of children with disabilities and children with language needs. We would also encourage the addition of gifted education in the requirement of diversity needs in the classroom.

Respectfully Submitted by:

Dr. Kathleen T. Bukowski

Associate Dean/School of Education

Mercyhurst College