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THE UNIVERSITY OF  
**SCRANTON**  
A JESUIT UNIVERSITY

DEPARTMENT OF EDUCATION

18 December 2006

Independent Regulatory Review Commission  
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Pennsylvania State Board of Education  
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INDEPENDENT REGULATORY  
REVIEW COMMISSION

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Members of the Commission:

Chapter 49-2 of 22 PA Code was published in the Pennsylvania Bulletin at the end of November. In response to the call for public comment, the following is submitted.

Allow me to suggest that the care and thought that has gone into the restructuring of the chapter is an obvious reflection of the professionalism of its authors and the wide consultation they sought. There are, however, several concerns that I have given the program in which I teach. The University of Scranton is neither the largest teacher preparation program in the state, nor is it the smallest. We are a regional institution drawing students from New York and New Jersey, among others. My concerns focus on the students we prepare for Pennsylvania, as well as those we export to other states. Allow me to be more specific.

I am particularly concerned regarding the preparation of "upper elementary (grades 4-8)" teachers. In both experience and evidence from other states in which similar bifurcated elementary certification has been adopted, the vast majority of elementary teacher candidates will elect "early childhood (PK-grade 3)" thus creating a shortage of teachers for the "upper elementary." While improving and professionalizing the field of ECE is an appropriate goal, it should not be at the expense of a more inclusive certification in elementary education that serves the "upper elementary" as well as the earlier grades.

Further, teachers currently in elementary schools have a more global view of child development and its impact on curriculum given the range for which they are prepared. Long term curriculum alignment complications (such as those criticized recently by the National Council of Teachers of Mathematics) are bound to occur without the more inclusive view now required of elementary educators. Additionally, I support K-6 or K-5 certification in order to enable principals to be flexible with teachers' assignments to a variety of grade levels during their careers without further preparation that bifurcation will make mandatory. Finally, a case-by-case system of exceptions does seem contrary to the purposes of the chapter and invites the issue of arbitrary decision-making.

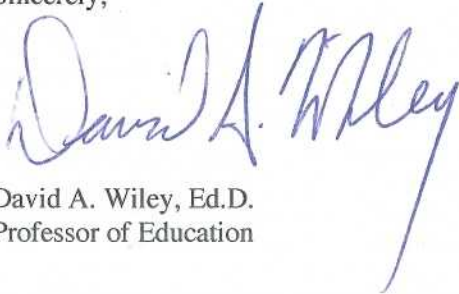
Another issue arises at our institution since a special education major takes one of the heaviest programs in terms of credit load. Adding coursework that amounts to a secondary content area poses the challenge of keeping that program as a four-year option. My concern is voiced here due to the demand for qualified special educators for service in grades 7-12 (and, perhaps, at the middle level). Similar to the changes proposed in the current elementary certification, it is my belief, based on informal interviews with our special education students, that the vast majority will opt away from the middle and 7-12 content options thus complicating, not solving, a special education teacher supply issue.

A parallel issue is one that affects our "secondary education programs." The requirement that all teachers are prepared to teach "diverse learners" is an excellent addition to the chapter. However, as is the case in NCATE accreditation, this goal can be achieved, assessed and monitored in ways other than credit counting. In the secondary programs here at the University of Scranton, the teacher candidates are education majors with literal second majors in the content area as well. From the practical view, adding any particular number of courses is problematic and seems to be an answer that is too undefined in terms of the outcome desired. It seems, rather, that any number of ways could be designed in order to demonstrate, as other professional standards do, that every teacher candidate possesses the knowledge and experiences necessary to teach diverse learners.

Finally, I offer a probable concern for the institution. Nearly half of the teachers prepared in Pennsylvania learn their craft at private institutions that pull their students from a variety of states beyond the borders of our commonwealth. In our situation, we pull students heavily from New York and New Jersey, and we send our graduates to positions in virtually every state in the union. My concern is regarding the interstate certification agreement and whether or not certificates in Pennsylvania (especially with the proposed and more narrow definitions of grade level preparation in elementary and special education) will be as widely accepted as they are now.

I wish to thank the Independent Regulatory Review Commission for offering me the opportunity to respond to the proposed contents of Chapter 49-2 as a means to insuring the best for students in schools across Pennsylvania. I urge the commission to consider maintaining the K-6 certificate for elementary education, defining a special education content area (and middle preparation) in a way other than as a literal major that would impact heavily on the credit load of prospective special educators, and allowing institutions to provide preparation and experiences to include diverse learners in creative ways.

Sincerely,

A handwritten signature in blue ink that reads "David A. Wiley". The signature is written in a cursive style with a long, sweeping tail that extends downwards and to the right.

David A. Wiley, Ed.D.  
Professor of Education