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Education Department  
Saint Francis University  
Loretto, Pennsylvania

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PA. STATE BOARD  
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Comments Upon Chapter 49-2 (Certification of Professional Personnel)  
as provided in the November 25, 2006 Pennsylvania Bulletin

A review of the proposed changes in the certification requirements for teachers in the state of Pennsylvania was conducted by the members of the Education Department at Saint Francis University, Loretto, Pennsylvania. The discussion provided a consensus of opinion shared by the professional education faculty as summarized below:

1. The faculty recommends the retention of the current grade-level structure for instructional certificates for all grade levels.
2. Under adoption of the proposed changes, this university and many others will face massive challenges including the following:
  - a. Significant difficulty in meeting the proposed timelines
  - b. Allocation of very significant amounts of money and faculty and staff to implement the proposed changes within timelines.
  - c. Smaller institutions which currently host successful programs may not be able to offer the full range of certification options due to the extremely high level of resources needed.
  - d. Students may not be able to graduate within the four-year time frame.
  - e. Students facing the new programs may be discouraged from entering teacher-training programs in Pennsylvania.
  - f. There could likely be a shortage of special educators in the state due to the changes.
  - g. For dual certification students in the elementary/middle school there is an excessive amount of PRAXIS tests likely to be required.
  - h. There will be a shortage of elementary/middle school teachers because of the overly burdensome requirements at this level.
  - i. Additional faculty and additional classroom space would be needed.
  - j. Tuition rates for students would need to be raised.
  - k. There are significant concerns about documenting the hours and credits for the special education and ELL requirements.
  - l. There is an insufficient number of PDE liaisons to assist in the transition and implementation process of regulations and guidelines.

Submitted for the Education Department at Saint Francis University

  
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