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College of Education
West Chester University
West Chester, Pennsylvania 19383-2300

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December 21, 2006

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

Dear Mr. Buckheit:

As one of the largest teacher education institutions in the Commonwealth, we applaud all efforts to support and strengthen teacher education programs, resulting in teachers who are well prepared to teach all children in our schools. We have studied the proposed changes to Chapter 49-2 very carefully and have weighed the implications of these changes.

Early Childhood/Elementary Middle Certifications

We believe that for our graduating early childhood and elementary/middle teachers to be fully prepared to teach children in their future classes, they will need to be dually certified. Classes from kindergarten through eighth grade have students at different levels of achievement; for teachers to be successful in teaching all of them, they need to be aware of the continuum of development of academic skills. Certification focused only on the early grades or the later grades will not provide them with this understanding and knowledge base.

Most of the elementary schools in the Commonwealth focus on K-5 or K-6; to be employable, our graduating students should be able to teach all the grade levels in these schools.

Additionally, many teachers who have graduated from Pennsylvania schools find positions in other states; these teachers will need certification that will match the states where they may be finding applying so that their certification will transfer.

Given these issues, we believe that our teacher education students should follow a program that will certify them for both K-3 and 4-8. In order for students to achieve this, they will need more than the four years mandated by the Pennsylvania Department of Education (PDE) or the 120 credits mandated by the Pennsylvania State System of Higher Education (PASSHE).

Preparation for Teaching Students with Disabilities and English Language Learners in Inclusive Classrooms

We support PDE's proposed changes to incorporate instruction for working with diverse learners – particularly children with disabilities and English Language Learners. However, we are

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concerned that the choice of 270 hours for instruction of literacy and cognitive skills for children with disabilities, and the many ways in which colleges/universities will meet those hours, will impact the quality of education of preservice teachers as instruction/modeling of skills and competencies may not come from "highly qualified" faculty members who have expertise in these fields. We have similar concerns about the 90 hours dedicated to English language learners.

Many of our programs are already at the maximum number of credit hours permitted by PASSHE and take the full four years allotted by PDE. These additional courses/hours will require programs to expand beyond those limits. This is particularly true for secondary programs where students must have majors in their content areas and equivalent majors in education.

Special Education Certification

We are concerned that the suggested changes to the Special Education Certification could create staffing problems in the public schools, particularly at the middle and secondary levels. If dual certification is required for content area and special education, teacher education students will have to spend considerably more time preparing for their positions. Children with disabilities will suffer the greatest amount because the already-existing shortage of highly-qualified special education teachers on the secondary level will increase.

Costs

Although the Pa Bulletin indicates that costs associated with these changes would be borne by the 95 colleges and universities with teacher education programs, in reality there would be additional costs to students since they would have to take additional courses and spend more time preparing to teach, and to the state which helps pay for the cost of public education.

Timeline

Section 49-15 suggests that by January 1, 2010, programs will be in place including the additional courses/hours of working with students with disabilities and ELL. However, it is unlikely that the specific guidelines for Chapter 49 will be distributed before late spring of 2007, giving little time to revamp programs. More importantly, section 85, indicates that the new certifications will be given starting January 1, 2012. Considering that a teacher education program will, at the very minimum, take four years, this date would give colleges/universities less than a year to completely redo programs to reflect the new certification. (Students who enter in January 2008 would be expected to be in the new programs.)

In many cases, new faculty will need to be hired to provide the expertise specified by Chapter 49-2. In some areas like special education and English language learners, very few faculty are available in the market place. Hiring and training of faculty in a tight labor pool take time, but without this faculty expertise, the goals of Chapter 49 will not be addressed substantially.

Clarification Needed

Within the document listing changes in Chapter 49-2, there are several issues that are not addressed. Specifically, the "core academic subject" as part of the 4-8 certification is not defined. We would suggest giving teacher education programs the latitude to design minor programs in content areas that would meet this requirement. Alternatively, the middle school Praxis tests in these areas could be used to determine eligibility to teach core subjects in grades 7-8. It should be noted, however, that for science at least, the Praxis test needs to be revised so that it more clearly represents science topics that are presented in grades 4-8.

Summary

In sum, we support strengthening teacher education programs, but we have the following concerns:

- Four years (PDE mandate) or 120 credits (PASSHE mandate) is not enough to prepare students to meet the requirements.
- Teaching about how to work with children with disabilities and ELL must be done by faculty with knowledge and expertise in these areas.
- Requiring dual certification for special education and content area on the secondary level is almost certain to result in a shortage of these teachers.
- Additional requirements will result in higher costs to universities, students and the Commonwealth.
- The timeline is too short to revamp teacher education programs to begin graduating teachers under the new plan by January, 1, 2012.
- Further explanation is needed about how teachers are to be prepared (and assessed) in meeting the core academic subject expertise for the 4-8 certification.

Thank you for your attention to our concerns. If you have questions or would like additional information about these issues, please get in touch with me.

Joseph Malak

Joseph Malak, Dean
College of Education