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From: Couchenour, Donna [DLCOUC@ship.edu]
Sent: Friday, December 22, 2006 8:47 AM
To: IRRC
Subject: Chapter 49-2 letter of support

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 INDEPENDENT REGULATORY
 REVIEW COMMISSION

Independent Regulatory Review Commission
 14th Floor
 333 Market Street
 Harrisburg, PA 17101

To Members of the Independent Regulatory Review Commission:
 RE: Chapter 49-2

I am writing this letter in strong support of the proposed changes to Chapter 49-2. My perspective is that of a thirty-year veteran as an early childhood teacher educator. This proposal for Pennsylvania teacher preparation incorporates the best of the existing research and practice in education. Further, it is more complex than it may appear: the result of creating a plan for teacher preparation in our Commonwealth that is the best that it can be, that will truly educate all children, and leave none behind. Further, all teachers will receive more preparation for working with special needs students, including those who are English language learners.

Currently, Pennsylvania does not require specialized teacher preparation for teaching young children or young adolescents. We have the K-6 or K-8 certification that is intended to "catch all". In addition, current special education certification, preschool-12th grade (or 21 years) does not provide those seeking certification in special education with specialized preparation for working with younger or older students with identified disabilities. Evidence exists that special educators need to have preparation that is more specialized relating to the age group or developmental age of children with whom they work—one program of certification cannot possibly prepare special education teachers to teach ages 3-21 years.

A plethora of research in early childhood education and middle level education supports the need for specialized teacher preparation for those who will teach young children and young adolescents, with and without identified disabilities or other special needs. This position is supported by numerous professional associations, based on three decades of research regarding best educational practices. Among the professional associations that support specialized teacher preparation are: National Middle School Association, American Association of Colleges of Teacher Education, National Association for the Education of Young Children, Society for Research in Child Development, Foundation for Child Development, Association for Childhood Education International, and the National Association of Elementary School Principals. The National Board for Professional Teaching Standards (NBPTS) also supports these levels of specialization.

A recent survey of early childhood teacher educators (Chrisman & Couchenour, 2005) emphasized the necessity of all early childhood teacher preparation courses to include both content AND pedagogy. This approach is supported by NCLB and will be more viable when certification focuses on p-3rd grade rather than the broad-based K-6 certification. Further, NCLB requires subject matter competency for 7th and 8th grade teachers. At present, Pennsylvania certification does not address in any way the special preparation needed for middle level teaching. Although small improvements have been noted in PSSA scores throughout the Commonwealth, we have a long way to go to be close to the 100% proficiency required by 2014. I am requesting that all decision-makers seriously consider the positive impact of these long needed updates to the current certification system.

Although, some attention has been given to "unintended consequences" of the proposed changes to Chapter 49-2, it should be noted that those points are all hypothetical in nature and focus on difficulties or obstacles for changing school district policies, not on preparing the best teachers possible for all Pennsylvania children. AACTE points to the need for specialized teacher preparation: "every child four to eight years deserves a teacher with a bachelor's degree in early childhood education and certification in the early childhood field." Presently, PA does NOT require that all children have such highly qualified teachers. The current overlapping P-3 and K-6 certification system allows for some children to have specially prepared early childhood teachers while many are denied teachers with such preparation. The existing proposal for Chapter 49-2 necessitates that all children have such well prepared teachers and is quite likely the most promising possibility we have for meeting

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future NCLB requirements.

I am grateful to those who have begun this shift in policy and I commend the work that has been done on the revisions to Chapter 49-2. It's time to move Pennsylvania's certification system in this direction and to begin the hard work that will support these changes.

Sincerely,

Donna Couchenour, Ph.D.