

Kathy Cooper

From: Thomas J. Meloy [tmeloy@iup.edu]
Sent: Friday, December 22, 2006 10:30 AM
To: IRRC
Cc: James Flynn; Mary Ann Rafoth
Subject: IUP's Comments regarding proposed Ch 49 rulemaking



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To the Commission Members:

Dr. Mary Ann Rafoth, Dean of IUP's College of Education and Educational Technology, has asked me to forward the letter that she prepared regarding IUP's comments on the proposed Ch 49 Rulemaking. In addition, a signed, hardcopy is being placed in today's mail.

Tom Meloy

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INDEPENDENT REGULATORY
REVIEW COMMISSION

December 22, 2006

Independent Regulatory Review Commission
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Harrisburg, PA 17101-0333

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To the Commission Members:

Since its founding in 1875 as the Indiana Normal School, Indiana University of Pennsylvania (IUP) has been widely recognized for its excellent programs in teacher education. As one of the fourteen universities comprising the Pennsylvania State System of Higher Education (PaSSHE), IUP is committed to preparing highly qualified teachers and educational professionals for the Commonwealth's public schools through our 22 initial teacher preparation and 11 advanced educator preparation programs. IUP's College of Education and Educational Technology (COE&ET) takes great pride in the national recognition earned by our programs through their respective specialized professional associations and in the continuing accreditation we received in 2005 from the National Council for Accreditation of Teacher Education (NCATE). In keeping with the tenants of NCATE, we work to ensure that our programs remain current and standards driven. We strive to ensure that our graduates not only know the content of their particular area of study, but that they are also able to design and deliver instruction that promotes PK-12 student learning.

As an NCATE accredited institution, IUP is accountable for our students' performance toward accomplishing the high standards we set for them to successfully complete an educator preparation program. We use student performance data to engage in a process of continuous, data driven program improvement. Our faculty and administrators accept and welcome our professional responsibilities related to determining the efficacy of our programs. As such, we applaud the efforts of the State Board of Education to review and amend various sections and requirements of 22 PA. Code Ch. 49 related to the certification of professional personnel. We also appreciate the opportunity extended by the State Board to offer comment on the proposed amendments.

IUP has identified the following, institution specific factors that are respectfully offered for the Board's consideration prior to final rulemaking:

1. §49.13 Policies. (b) (4) (i). We applaud the incorporation of requirements for all programs to include preparation related to accommodations and adaptations for students with disabilities in an inclusive setting and for preparation related to addressing the instructional needs of English language learners. We support embedding within existing courses the proposed 270 hours and 90 hours of activities, respectively, to address these areas. We

strongly suggest that a list of skills and competencies that all candidates are expected to know and be able to do to work successfully with diverse learners, be prepared and disseminated by the Pennsylvania Department of Education. We cannot, however, support the proposed equivalent 9 and 3 credit hour requirement for new courses within our preparation programs. There are two issues here for the Board's consideration: (a) the PaSSHE, 120-credit hour restriction for program completion; and, (b) the extended, minimum two-year time period needed to develop, propose and adopt curriculum modifications to state system approved programs of study. Based upon these two issues and our desire to improve program offerings without sacrificing program quality, we request that the Board eliminate the reference to credit hour requirements and the suggestion for new courses.

2. Subchapter B. Instructional Certificates. §49.85. Limitations. The elimination of the current elementary certification (K-6) will negatively impact upon the continued success of our Professional Development Schools, and in general, not meet the long term staffing needs of our partner schools. IUP has partnered with four area school districts to establish Professional Development School (PDS) sites for the preparation of some of our elementary education candidates. Our PDS sites are designed to provide a full-year placement for our candidates during which they have an active, extended clinical field experience with students in all grades K-5; they complete some of the core educational courses at the PDS site; and, basic education teachers, university faculty, and university candidates work collaboratively to promote student achievement. Our PDS model has been very successful with our urban, suburban, and rural school partners. It is a costly alternative to the standard student teaching model, but one that has been so successful that we plan to continue to extend its application to other partner sites. Elimination of the current elementary certification (K-6) will result in a complete mismatch of the K-5 grade level organizational structure most commonly used by our partner schools with the proposed Early Childhood (PK-3) and Elementary/Middle (Grades 4-8) certifications. We believe that the achievement of both grades K-5 and grades 6-8 students will suffer as a result of this mismatch. The proposed separate certification limitations will result in discrete and disjointed placements for our candidates within the PDS. Our PDS sites are true examples of an entire school community working collaboratively to improve student achievement. The certification limitations will establish barriers to the continuation of that collaboration. We request that the Board give full consideration to maintaining the current Elementary

K-6 certification and to establishing other procedures that would permit K-6 candidates to gain certificate endorsements for initial work with students in grades PK-3 or 4-8 classrooms. We envision having these endorsements supplemented by additional studies for candidates completed as part of the required 24 post baccalaureate credits needed for a Level II certificate and resulting in dual certification as either (a) ECE PK-3 and Elementary K-6, or (b) Elementary K-6 and Elementary/Middle 4-8 with an endorsement in a core academic subject for use in grades 7 and 8. We believe that this certificate alignment that combines existing with proposed certifications will be in the best interests of both basic education students and our partner school districts. Successful programs such as our PDS sites that are positively impacting student achievement would be continued and the preparation programs for our candidates and graduates would be improved. We also believe that this certificate alignment will meet the varied, long term staffing needs of our basic education partners.

3. Subchapter B. Instructional Certificates. §49.85. Limitations. The elimination of the current Special Education PK-12 certificate and the proposed requirement for one of three dual certifications to replace it are not possible within a framework of 120 credit hours for programs similar to IUP's that prepare candidates to work with students at various levels of special learning needs including mild, moderate, and severe. We propose that the Board modify the proposed rulemaking to maintain the current Special Education PK-12 certificate and to establish procedures that would permit special education candidates to gain endorsements for initial work with students in grades PK-3, K-6, and for working with special needs students in grades 7-12 in a core academic subject. We envision having these endorsements supplemented by additional studies completed as part of the required 24 post baccalaureate credits needed for a Level II certificate and resulting in dual certification as: (a) Special Education PK-12, ECE PK-3, or (b) Special Education PK-12, Elementary Education K-6. For those candidates desirous of qualification to teach a core academic subject to special needs students in grades 7-12, they could complete post baccalaureate studies resulting in Level II certification in Special Education PK-12 with full endorsement for working with grades 7-12 special needs students in a core academic subject area. We believe that absent these modifications to the proposed rulemaking, we will find fewer candidates interested in pursuing a program leading to Special Education certification. This will exacerbate the staffing problem that many districts, especially our urban districts, have in finding trained and highly qualified teachers to provide appropriate learning

opportunities for their special needs students. This will be especially true under the proposed requirement for dual certification in a core academic subject area at grades 7-12. Absent a sufficient number of candidates matriculating through our special education programs, IUP and other universities will be forced to seriously consider the economic viability of continuing an undersubscribed program of studies.

Indiana University of Pennsylvania and the College of Education and Educational Technology would like to thank the State Board for the careful consideration it is extending to the proposed Chapter 49 rulemaking. We recognize the difficulty of this undertaking, but appreciate all the efforts being made to improve learning opportunities for students at both the basic and higher education levels. We fully accept our responsibility to be an active participant in this important change process. We look forward to continuing our work with our sister institutions, our public school partners, the Pennsylvania Department of Education and the State Board of Education to ensure that Pennsylvania maintains its leadership position in preparing highly qualified teachers and promoting high quality education for all of our students.

Respectfully,

Mary Ann Rafoth, Ph.D.
Interim Dean, College of Education and Educational Technology

c: Dr. Cheryl Samuels, Provost