



December 22, 2006

Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101-0333

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INDEPENDENT REGULATORY
REVIEW COMMISSION

To Whom It May Concern:

I am writing to express some concerns, as well as some positive sentiments, about Chapter 49-2. As a professor of education, certain aspects of these regulations cause me great concern. In particular, the fractionation of early childhood and elementary/middle school certification is likely to create major problems. Developmentally, this division is problematic. I have found nothing in the literature recommending common preparation of teachers for grades 4-8. Students in grade 4 are vastly different from those in grade 8. In order to prepare teachers to address the needs of the upper elementary students and the middle school students, extra coursework would be needed, in addition to content specializations for the middle school, making it almost impossible for these preservice teachers to finish their teacher education programs in four years. In addition, there is an overlap with the secondary certification for grades 7-8. In my mind, if a split must be made, it makes much more sense to have the upper elementary certificate apply to grades 4-6, or even to have a separate middle school certificate covering grades 6-9, with one year overlap on either end to accommodate different structures of schools across the nation.

The larger issue is whether to divide the elementary certificate at all. I can foresee huge problems for school administrators in staffing when a large cohort group progresses through the grades. Administrators need more flexibility in moving teachers from grade to grade. Also, informal polls have indicated that most preservice teachers would choose the early elementary certificate, perhaps leading to a shortage of teachers at the 4-8 level. In addition, the achievement levels of children in the classrooms continues to widen, meaning that a given teacher could have a 4-6 year span in the levels of materials from which his/her students can meaningfully benefit. Limiting the certification levels will decrease the breadth of the teacher's preparation and ultimately may detract from meeting each child's individual needs, whether they be for remediation or acceleration. Finally, few if any other states have split their elementary certifications, indicating problems in meeting certification requirements for our graduates if they wish to relocate.

I do applaud the emphasis being given to early childhood programs. However, many teacher education programs are already providing this emphasis by offering endorsements to the current elementary certifications. Strengthening the endorsement requirements may accomplish the same goal as splitting the certifications, with far fewer negative ramifications.

As a former special education and gifted education teacher, I believe that strengthening the requirements for all teachers in special education and ELL is a positive move. While it will require some restructuring of many education programs, including ours, it is the right thing for children. In addition, the new endorsements proposed in 49.62b are a very positive move in strengthening education for special populations of children and young adults. I am particularly in favor of the endorsements proposed in gifted education and autism spectrum disorders.

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Colleen Willard-Holt".

Colleen Willard-Holt, Ph.D.

Associate Professor of Education

Director of Initial Certification Programs