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December 22, 2006

Mr. Jim Buckheit  
Executive Director  
State Board of Education  
333 Market Street  
Harrisburg, PA 17126

RECEIVED  
2006 DEC 27 PM 2:13  
INDEPENDENT REGULATORY  
REVIEW COMMISSION

RE: Proposed Rulemaking, Chapter 49 *Certification of Professional Personnel*

Dear Mr. Buckheit:

Thank you for the opportunity to comment on proposed changes to Chapter 49 as they relate to the requirements for programs preparing all teachers, and in particular, the requirements for those preparing early childhood, elementary and special education teachers. The Board and the Department are to be commended on the time they have spent analyzing the issue and in engaging interested stakeholders throughout Pennsylvania. Important changes in the proposal have occurred through this iterative process. This revised Chapter 49 will change substantially the ways in which we prepare teachers and the skills and knowledge that they will bring to their craft. Many of these changes are long overdue—given the realities of our classrooms—but that does not mean that they will be easy to achieve.

Research has demonstrated for some time that the broad scope of the elementary education certificate—pre-K through 6<sup>th</sup> grade—is not serving students well. Students in the early elementary years need teachers who are better prepared to teach reading and to understand and help students overcome reading difficulties than current preparation programs provide. In the upper elementary years, greater content in mathematics, science and other disciplines is necessary to enable students to reach their potential. This was one of the major points made in the Pennsylvania State System of Higher Education *Report of the Task Force on Elementary Education; Teachers of Tomorrow* which was issued recently.

The Board and the Department focused on the needs of learners at all levels and for the specific needs of diverse learners in this proposal. I have two suggestions to improve the proposal and the understanding of it throughout the educational community in the Commonwealth. First, while not part of the regulation, draft program approval standards should be made available to the field as soon as possible. Even those in support of the proposal are concerned about the details in the program approval standards and their relationship to national standards in the preparation of teachers. Understanding how the Department will be implementing the broad changes in Chapter 49 is essential to continuing to develop support and clarity in implementation.

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Second, much of the discussion over the past months has focused on the specific requirements in special education and for English language learners: now expressed in terms of both academic credits and equivalent hours. Some clarification is given in this proposal, but more would be helpful. In particular, delineating the knowledge and skills to be attained would help teacher educators better understand the kinds of changes that will be necessary in program curricula and individual courses. Again, this can be accomplished through program guidelines issued by the Department, but may be essential to developing support for the proposed changes in the regulation.

Please know that while these changes are important ones to make, they will take considerable effort on each of our campuses. Adequate time must be provided to allow programs to make the necessary changes in their curricula and course content. Many courses will need to be revised while others will need to be developed. Integrating new requirements with existing university requirements and accreditation standards while minimizing additional credits required for graduation will be quite a balancing act. While we are up to the challenge, we must understand that there will be *transition costs* as we work to meet the new requirements and continue to meet our obligations to teacher candidates in the pipeline; also, there will be *ongoing costs* for substantially expanded preparation programs. I encourage you and your colleagues in the Department to look carefully at implementation costs and timelines as part of this proposal going forward.

Thank you for the work that you, Board members, PDE staff, and others have invested in these changes and for carefully listening to our many concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter H. Garland". The signature is fluid and cursive, with a large initial "P" and "G".

Peter H. Garland, Ph.D.  
Executive Vice Chancellor