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University of Pittsburgh at Johnstown
450 Schoolhouse Road
Johnstown, PA 15904

TO: Mr. Jim Buckheit, Executive Director, Commonwealth of Pennsylvania State Board
of Education and Members of the State Board of Education

Members of the Independent Regulatory Review Commission

FROM: Karen Cameron Scanlon, Ed.D.
Chairperson, Division of Education, University of Pittsburgh at Johnstown

DATE: December 22, 2006

RE: Proposed Changes to Chapter 49-2

I am writing in response to the proposed version of Chapter 49-2 as published in *The Pennsylvania Bulletin*, November 25, 2006. From the perspective of the institution where I teach and other institutions with which I am familiar through professional meetings and service, I would like to address two primary areas of concern about this document – the established implementation times for the changes to become official and the proposed changes to the existing elementary certification. I will address each of those areas below.

IMPLEMENTATION TIMES

In an earlier e-mail message that I sent to Mr. Buckheit (11/20/06) about implementation times in Chapters 49-1 and 49-2, I outlined the problems inherent in making the proposed changes at the higher education level in time for students in our programs to apply for the new certificates. Chapter 49.2, Section 49.85 (b) establishes the requirement that candidates applying for certification “on or after January 1, 2012, follow the new grade level limitations” as outlined in the proposal.

Trying to implement those proposed changes within the period of time allotted is not possible within the administrative structure of higher education institutions. Colleges and universities have procedures that must be followed for any curricular changes, let alone changes of the magnitude being proposed. Every course and faculty change made affects every department on campus. After all the proposed regulations have been approved by the Legislature, and after the new standards for those changes have been written, approved, and disseminated to all teacher preparation institutions in the Commonwealth, institutions will need AT LEAST ONE FULL YEAR for planning a curriculum and submitting that plan for approval by several levels of committees across the institution just to be able to begin the new programs. Only at that time can we publish the program and admit new freshmen to the changed program. We simply cannot make a drastic change to a student’s program once the student has been admitted to the institution.

In more specific terms, the students who will be expected to complete programs following the regulations in Chapter 49-2 for certification application on or after January 1, 2012 would have to begin those programs in fall 2007. Many of the freshmen beginning college in fall 2007 will not be able to complete the program under which they entered within the expected four-year period of time due to a variety of legitimate reasons. Those students, then, may be student teaching in fall

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2011, and some of those students may not be applying for their certificates until January 1, 2012. At that time, the students' teacher preparation programs will become invalid. Of course, no institution can have the proposed program in place even by fall 2007 because at this time we do not have standards to follow nor the year required to plan new curricula and have those curricula approved.

CHANGES TO THE ELEMENTARY CERTIFICATE

I join other teachers and teacher educators who object to the changes in the elementary level certificate for two main reasons. The first is that this type of split in the elementary level teacher's preparation **does not take into account the developmental nature of the child.** Teachers who have been prepared to teach children in grades 4-8 will not have the instruction needed to meet the needs of children entering grade 4 who cannot read or do mathematics at the typical nine-year-old level.

At the present time, there is a sensible overlap in the major levels of certification that reflects the realities of development. Early childhood education overlaps elementary education and secondary education overlaps middle school education. Those elementary teachers who add the content courses to pass middle level PRAXIS exams can also teach in grades 7-9, thus providing another area of overlap. To split the elementary level certificate in the manner that has been proposed makes absolutely no pedagogical or developmental sense whatsoever.

My second objection has to do with the portability of the new "elementary" certificate. Many of the students educated as elementary teachers in Western Pennsylvania find it difficult or impossible to find open positions in our area of the state due to the change in demographics. Those graduates choose to accept teaching positions most frequently in Maryland, Virginia, and North Carolina rather than to accept positions in Eastern Pennsylvania, Ohio, or states to the north of PA. Employers are seeking teachers who are certified to teach all of the elementary grades rather than those who are limited to grades 4-6 only, the typical limit of most elementary schools. Therefore, while PA has been noted for its excellent teacher preparation programs, I fear that our future graduates will find it very difficult to compete for jobs with graduates of other states who have been prepared to teach the full range of elementary level students.

I appreciate your concern for the education of our children, youth, and college students in PA. In that light, I hope you will give very serious consideration to the concerns raised in this memorandum.