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

To Whom It May Concern:

I am writing concerning Chapter 49-2 which is now in the Public Comment period. In reviewing the *Regulatory Analysis Form* I am especially concerned about the following:

*How does this regulation compare with those of other states?  
Will the regulation put Pennsylvania at a competitive  
disadvantage with other states?*

I believe that Chapter 49-2 will put Pennsylvania (and its teacher education graduates) at a distinct competitive disadvantage with other states. It will discourage potential teacher candidates from enrolling in Pennsylvania teacher preparation programs and it will make graduates of Pennsylvania teacher less employable in other states.

Currently PA graduates about twice as many elementary certified teachers as are employed each year in PA. Many of these PA graduates seek employment in states, especially on the east coast of the United States. Often they return to PA after they have gained teaching experience and earned advanced degrees. Teacher education is a very strong positive economic force in PA. PA is sixth in the nation in the number of teachers prepared. If our graduates are less employable in other states, it will discourage enrollment in teacher preparation institutions in this state.

States on the eastern seaboard (see **BOLD** in Table A) with the exception of Georgia, have a K-6 (or very similar) general elementary certification in addition to the Early Childhood certification and the Middle School

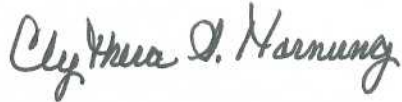
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certification. In the changes proposed by Chapter 49-2 there will be no general elementary certification in Pennsylvania. This will limit the portability of PA certified elementary teachers.

<b>Table A</b> <b>Certificate Options for ECE, Elementary, Middle and Special Education</b> <b>Selected States</b>				
<b>State</b>	<b>ECE</b>	<b>Elementary</b>	<b>Middle</b>	<b>Special Education</b>
<b>Florida</b>	<b>Preschool</b>	<b>K-6<sup>th</sup></b>	<b>5-9<sup>th</sup></b>	<b>K-12</b>
<b>Georgia</b>	<b>P-5</b>	<b>4-8<sup>th</sup></b>	<b>See Elementary</b>	
Illinois	Birth – 3 <sup>rd</sup>	K-9 <sup>th</sup>		Endorsements
<b>Maryland</b>	<b>Prek-3<sup>rd</sup></b>	<b>K-6<sup>th</sup></b>	<b>4-9<sup>th</sup></b>	<b>P-12</b>
Massachusetts	P-2 <sup>nd</sup>	1-6 <sup>th</sup>	5-8 <sup>th</sup>	K-12
Michigan	ECE Endorsement	K-6 <sup>th</sup>	6-8 <sup>th</sup>	K-12 added to El or Sec Ed
Mississippi	Prek-3 <sup>rd</sup>	K-3 <sup>rd</sup>	4-8 <sup>th</sup>	K-12 & K-8/Mild to Moderate & Severe
Nevada	None	K-8 <sup>th</sup>		K-12 plus El or Sec
<b>New Jersey</b>	<b>P-3<sup>rd</sup></b>	<b>K-5<sup>th</sup></b>	<b>6-8<sup>th</sup></b>	<b>Dual</b>
<b>New York</b>	<b>Birth – Age 6</b>	<b>2-6<sup>th</sup></b>	<b>5-9<sup>th</sup></b>	<b>B-2; 1-6; 5-9</b>
<b>North Carolina</b>	<b>B-K</b>	<b>K-6<sup>th</sup></b>	<b>6-9<sup>th</sup></b>	<b>K-12</b>
<b>Ohio</b>	<b>P-3<sup>rd</sup></b>	<b>None</b>	<b>4<sup>th</sup>-9<sup>th</sup></b>	<b>K-12 Mild/Moderate or K-12 Moderate/Intensive</b>
Oregon	P-4 <sup>th</sup>	3-8 <sup>th</sup>	5-10	Special Ed after content
South Carolina	K-4 <sup>th</sup>	1-8 <sup>th</sup>	5-8	K-12
Texas	EC-4 <sup>th</sup>	4 <sup>th</sup> – 8 <sup>th</sup>	8 <sup>th</sup> – 12 <sup>th</sup>	K-12
Virginia	P-3 <sup>rd</sup>	P-6 <sup>th</sup>	6-8	P-12 or NK-12 ECE/Special Ed

Pennsylvania has an excellent reputation for teacher preparation. Graduates are sought by other states to fill their vacant positions. Please reconsider the negative impact of the proposed regulations in Chapter 49-2.

Sincerely,

A handwritten signature in black ink that reads "Clythera S. Hornung". The signature is written in a cursive style with a large initial 'C'.

Clythera S. Hornung Ed.D.

cc: James Buckheit, State Board