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State Board of Education
333 Market Street
Harrisburg, PA 17126-0333

INDEPENDENT REGULATORY
REVIEW COMMISSION

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Dear Members of the State Board of Education:

I am writing to support the proposed changes to Chapter 49 with regard to teacher certification. I am Associate Dean and director of the School Education at Carlow University in Pittsburgh. I realize that you have been hearing from faculty members at many colleges and universities who do not support these changes. I do not agree with their rationale for opposing the regulation changes and would like to counter some of their arguments.

- Some argue that Chapter 49-2 will result in the elimination of the current PA elementary certification (K-6).

There is strong evidence that teachers of young children (3-8 years of age) need specific information about how young children learn. Teacher preparation programs for elementary education typically focus on the conceptually-thinking child (usually 8-12 years of age). There is little time in the elementary education program for adequate attention to the learning needs of children who are under 8 years of age. The Chapter 49 proposal provides an opportunity to rectify this situation and assure that teachers of children from ages 3-8 will have the necessary knowledge and skills to provide the best beginnings in formal education.

Similarly, a strong focus on middle childhood (ages 9-14) will prepare stronger teachers for those children in the intermediate and middle level grades. It is my hope that the Middle Level Certification guidelines will include strong language about the developmental needs of children in these grades as well as the important content-specific guidelines.

- Some suggest that the Chapter 49 proposal will narrow the focus of teacher preparation and could create voids in the teachers' ability to deal with student developmental needs.

While the Chapter 49.2 proposal may narrow the specified age ranges, there is strong evidence that such divisions will add a depth of knowledge concerning the special challenges of teaching each age group. Again...the guidelines that develop from Chapter 49 should include strong language about the specific developmental and learning needs of these two very different age groups: early childhood and intermediate/middle level learners.

- Some suggest that Chapter 49-2 changes in elementary teacher certification will encourage teacher isolation.

There is no evidence to suggest that teachers will become more isolated. In fact, a coherent teacher preparation program for ALL teachers of children from Pre-K through Grade 3 will strengthen collaboration and collegiality. Currently, some primary teachers have elementary education preparation and others have early childhood preparation. These two teacher preparation programs do not share a common philosophical or pedagogical framework, which often leads to confusion and/or disagreement about curricular decisions in the primary grades. Similarly, teachers in middle level grades may have elementary preparation (K-6) or they may have secondary preparation (7-12). Here again, these preparation programs differ greatly in their content and pedagogy. A more unified teacher preparation program for ALL teachers at these grades levels will improve the quality of teaching in these critical years.

- Some suggest that Chapter 49-2 certification changes are likely to have a dramatic negative impact on Professional Development School (PDS) approach to teacher preparation.

At Carlow University, we are looking forward to developing the PDS model with the early childhood programs in the Pittsburgh Public Schools. Until recently, we had much difficulty placing early childhood student teachers in the 90+ Pre-K classrooms in the city because many of the teachers did not hold Early Childhood teacher certification. It was hard for early childhood certified teachers to get on the Pittsburgh eligibility list because of the overlap in teacher preparation (K-6 elementary and N-3 early childhood). With a requirement that teachers in Pre-K and early grades hold early childhood certification, there will be even greater opportunities for collaboration using the PDS model.

- Some suggest that Chapter 49-2 could result in a shortage of educators prepared to teach in upper elementary (grades 4-8).

Many of the elementary education candidates at Carlow University admit that they hope to teach in the primary grades. They would be better prepared to do so with an early childhood focus than the current elementary program. For those who would actually prefer to teach upper grades, a teacher preparation program that focuses on the developmental and pedagogical needs of the middle level student would be more in order. Teacher preparation programs will have to provide assurances that prospective teachers have early field experiences across all age groups to help candidates decide on the certification they wish to pursue.

- Some suggest that Chapter 49-2 could create staffing problems for elementary schools in Pennsylvania because of decreased certification flexibility.

As more school districts add Pre-K classes and expand into full day kindergarten there will need to be more qualified teachers available for these positions. Presently some principals use grade assignment as a way of "punishing" teachers. The new certification levels will not allow a teacher with experience and expertise in 6th grade to be "punished" by being sent to kindergarten (clearly more of a punishment for the children).

- Some suggest that Chapter 49-2 will limit the portability of PA certified elementary teachers.

While this may be true in some states, there is growing recognition that teachers in the early grades should have specialized preparation in early childhood, and that intermediate and middle level teachers should have stronger content knowledge and a better understanding of the developmental needs of intermediate and middle level students. While I recognize that Pennsylvania exports many of its teachers, our primary concern should be the welfare of the children of Pennsylvania. We must be sure that we provide the best and most qualified teachers available.

- Some suggest that Chapter 49-2 will result in a narrowing of teacher preparation expertise which may result in a student who is ready to learn a

concept or skill being assigned to a teacher who is not knowledgeable about that concept or skill.

Teachers have always been able to take a child beyond his or her own level of expertise by using the resources and materials that are available in the districts. The narrowing of the teacher preparation allows for greater depth and stronger expertise in a given area. By collaborating with other professionals in the schools, teachers will be able to provide the necessary curriculum adaptations for all children.

- Some suggest that Chapter 49-2 will exacerbate the current short supply of special education teachers due to the credit requirements for dual certification.

At Carlow University, we do not find this to be a problem. A great number of our students complete dual certification in early/special or elementary/special. This requires one or two additional student teaching placements that may extend into the early summer, but it is quite possible for students to complete these programs in four years. We have aligned our preparation programs and, with collaboration between the special education and regular education faculty members, have developed programs that prepare students to work in inclusive settings as well as in settings for children with severe and profound disabilities. It is our hope that additional graduate specialties will be developed for autism, early intervention, and for teachers of adolescent and adult students who have severe and profound disabilities. The Chapter 49 proposal assures that more teachers will be prepared to recognize and teach children with special learning needs.

I strongly urge you to support the Chapter 49-2 proposal and I thank you for your commitment to the children of our Commonwealth.

Sincerely,

Roberta L. Schomburg, PhD
Associate Dean & Director
School of Education
Carlow University
3333 Fifth Avenue
Pittsburgh, PA 15213
PH: 412-578-6312
e-mail: schomburgrl@carlow.edu