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Pennsylvania Association for the Education of Young Children

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March 4, 2022

**Independent Regulatory  
Review Commission**

To: Commissioner Bedwick  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

Commissioner Mizner  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

Commissioner Soroko  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

Commissioner Ufberg  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

Commissioner Watson  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

Dear Commissioners Bedwick, Mizner, Sororko, Ufberg and Watson:

The Pennsylvania Association for the Education of Young Children (PennAEYC) would like to thank you for the opportunity to offer our support of the certification of professional personnel final-form rulemaking (Regulation #6-346). PennAEYC is a statewide, non-profit membership organization of over 2,700 early childhood care and education professionals. As the Pennsylvania affiliate of the National AEYC, we strive to be an effective voice for high-quality early childhood care and education through policy development, advocacy and professional development and supports for early childhood professionals.

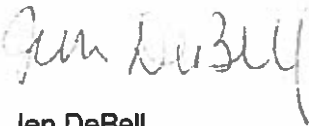
We are pleased to see that the final-form regulation ensures the developmental and educational needs of each age group of children and young adolescents is the priority related to teacher certification grade spans. We support these final-form regulations and the teacher certification grade spans prioritizing children and youth and ensuring that the commonwealth has teachers that are well-prepared in developmentally-appropriate practice and instruction for the age-group / developmental period that they teach. These final form regulations also reflect teacher certification grade spans that align with research-based child and adolescent development periods. We appreciate that the State Board of Education prioritized the needs of children and youth in this area.

In regard to Section 49.14(4)(v), related to the annual reporting requirements for educator preparation programs for students admitted, retained, and graduated, including students from historically underrepresented groups, we support this requirement as an effort to more fully understand the demographics of those enrolled in educator preparation programs to inform efforts and strategies in addressing the shortage of teachers of color in Pennsylvania. In our comments on the proposed regulation, we had recommended specific language be included that institutions/alternative providers be required to report disaggregated data by gender, age and languages spoken. Knowing the breakdown of the student demographic data

by grade span would also be helpful to see which grade spans and content areas are lacking diversity, as we know representation is important along the educational journey. Specifically, for young children developing their own sense of identity and belonging, it is essential that they have relationships with teachers with which they can identify. We are hopeful that policies developed by the Department of Education would require these specific data points and also request information from institutions and alternative programs regarding how they are addressing recruitment and participation of students from underrepresented groups. The population of students enrolled in educator preparation programs has a direct correlation to population of teachers in Pennsylvania and this data is important to track progress on the goal of dramatically increasing the number of teachers of color in Pennsylvania.

Please do not hesitate to contact our Director of Public Policy and Advocacy, Kimberly Early at [kearly@pennaeyc.org](mailto:kearly@pennaeyc.org) should you have any questions regarding our comments.

Sincerely,

A handwritten signature in black ink that reads "Jen DeBell". The signature is written in a cursive, flowing style.

Jen DeBell  
Executive Director