



Pennsylvania State Board of Education
 333 Market Street 1st Floor
 Harrisburg, PA. 17126
 January, 14, 2021

To the State Board of Education
 Re: Proposed changes to Chapter 49

I would like to comment on the proposed changes to Chapter 49. I am a parent of an individual with a disability who received special education services starting in early intervention and through to age 21, a retired Special Education Teacher, a peer monitor for cyclical compliance and former member of the Special Education Advisory Panel (SEAP) for over 18 years.

I have some concerns with the proposed changes to Chapter 49. I shall address them below.

1. Approval of induction plans 49.16

In the area of structured literacy it is not being addressed in the induction period for new teachers and it is limited to elementary teachers. Structured literacy should service the continuum of student need preschool through age 21. Resources currently available to LEAs for address the training areas identified in Chapter 49 include vendors and higher education institutions who are able to provide rigorous and evidence-based training. If these resources are available through online options, LEAs would be able to consistently address the needs of students and teachers and ensure the coordinated delivery of services. Why spend additional funds to train IU/Patten staff (which is not all that culturally diverse) to address structural literacy, trauma-informed education as well as cultural competency when this can be addresses via vendors and higher education? We are trowing more and more money at the Intermediate Units and Patten for train the trainer programs, and that money could be used more effectively than a whisper down the lane training.

2. Definition 49.1

Under cognitive competencies- there is no definition provided but required under induction plans and educator preparation. No definition, discussion or rationale for its inclusion was provided. The cognitive competencies MUST include a researched base of evidence and not conflict with the Science of Reading (SOR) of structured literacy.

3. Supervisory Certificate 49.111

Subsection (e) is proposed to be added to permit school psychologists who have completed 5 years of satisfactory certified experience as a school psychologist to be issued a Special Education Supervisory Certificate. The Board proposes this revision to help increase the availability of qualified special education supervisors in this Commonwealth. Pennsylvania has a shortage of qualified school psychologists. Pennsylvania has reported to OSEP in the Annual Performance Plan, Indicator 11, plan is never met. At issue is the shortage of qualified school psychologists. Pennsylvania has been required to award compensatory education as well as being expected to develop and implement a corrective plan to deal with the shortage of school psychologists. Students are not receiving the services they need to make meaningful, measurable progress when the student is not evaluated in a timely manner. Pennsylvania will create yet a bigger issue if the following suggestion is implemented. Pennsylvania will be "robbing Peter to pay Paul."

In addition, school psychologist do not have classroom experience. Classroom experience provides the day in day out interaction with students, classroom management and involvement

with curriculum. School psychologist do not have this experience and allowing them to move into supervisory role will not enhance the delivery of services to special education students. Chapter 49 could address the need to special education supervisors by making a pathway for classroom teachers to become supervisors. In addition, OSEP does not have an indicator that requires the state to have corrective action plan if there is a shortage of special education supervisors.

Pennsylvania needs to focus on teaching students how to read. It is the cornerstone to the future of our student's education and post school outcomes. We must close the achievement gaps among our students and improve professional employee's knowledge of professional ethics and language and literacy.

Please do what it in the best interests of our students while making sure to be fiscally responsible to the tax payers! I will also recommend that Pennsylvania take advantage of the many experienced educators who are now retired and specifically request their input when forming stakeholder groups; Pennsylvania is right in resources of those far more experienced in the world of education than most anyone currently working within PDE, and utilize the Special Education Advisory Panel as well.

Sincerely,

Kathleen Coleman