

**Jones, Stephanie**



**From:** Valerie Houser <vhouser@psd.org>  
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**To:** ED, State Board of Ed  
**Subject:** [External] Public Comments on Proposed Amendments to Chapter 49 (Regulation # 6-346)

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The following comments and questions are from a collective of administrators at PA School for the Deaf. Thank you for the opportunity to review the recommended changes to Chapter 49.

§ Section:	Comment/question
<p><b>§49.14 (4) (ix)</b> Approval of Institutions and alternate program providers</p>	<p>“Institutions and alternative program providers provide ongoing support for novice educators in partnership with local education agencies during their induction period, including observation, consultation, and assessment.”</p> <ul style="list-style-type: none"> <li>•</li> <li>• <b>How</b></li> <li>• <b>will this be coordinated?</b></li> <li>•</li> <li>•</li> <li>• <b>Is</b></li> <li>• <b>this required of teacher ed programs?</b></li> <li>•</li> <li>•</li> <li>• <b>Will</b></li> <li>• <b>this support also be available to Approved Private Schools/special education programs outside of the local education agency?</b></li> <li>• <ul style="list-style-type: none"> <li>○</li> <li>○ <b>Will</b></li> <li>○ <b>this be required of LEAs and APS programs?</b></li> <li>○</li> </ul> </li> </ul>
<p><b>§49.14 (4) (x)</b> Approval of Institutions and alternate program providers</p>	<p>“...achieve a satisfactory level on all assessments...”</p> <ul style="list-style-type: none"> <li>•</li> <li>• <b>Does</b></li> <li>• <b>this refer to the continued use of the PRAXIS?</b></li> <li>•</li> <li>•</li> <li>• <b>During</b></li> </ul>

	<ul style="list-style-type: none"> <li>• sessions and discussions of the Chapter 49 revisions, many school leaders were recommending the exploration of performance assessment (over an identified period of time and with supporting artifacts) in supplement to or in lieu of the PRAXIS exam.</li> <li>•</li> </ul> <p>Many people can pass a test, though not all of them can actually teach nor relate to students. It is often those who have experienced the struggle in their path to understanding who are better able to support their students in their own journey.</p>
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<p>§49.16 (a) Approval of induction plans.</p>	<p>“Each school entity shall submit to the Department for approval a plan for [the] a two-year induction experience for first-year teachers”</p> <ul style="list-style-type: none"> <li>•</li> <li>• <b>Will</b></li> <li>• additional monies be available to schools to support this added requirement?</li> <li>•       <ul style="list-style-type: none"> <li>○</li> <li>○ <b>Financial</b></li> <li>○ considerations would need to include APS/Special Education Programs outside of the local education agency as well. (Any entity submitting an induction plan)</li> <li>○</li> </ul> </li> <li>•</li> <li>• <b>If</b></li> <li>• we get a new teacher that has only completed a year at a previous school, how will their progress be shared with the current school?</li> <li>•</li> <li>•</li> <li>• <b>Will</b></li> <li>• the same mentor be required to remain with the same new teacher for the prescribed 2 years of the Induction Program?</li> <li>•       <ul style="list-style-type: none"> <li>○</li> <li>○ <b>As</b></li> <li>○ <i>a small Approved Private School, this will greatly deplete our available mentors year to year.</i></li> <li>○</li> <li>○</li> <li>○ <b>Will</b></li> <li>○ <i>PDE provide funding to financially supplement a mentor’s commitment to this increase in responsibility which is in addition to their regular responsibilities?</i></li> <li>○</li> </ul> </li> <li>•</li> </ul>
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	<ul style="list-style-type: none"> <li>• <b>Will</b></li> <li>• <b>new teachers be required to pay into this program (similar to NJ) or will this be at no cost to the teacher?</b></li> <li>•</li> </ul>
<p>§49.16 (c) Approval of induction plans.</p>	<p>“Induction plan guidelines shall include professional ethics, cognitive competencies, and culturally relevant and sustaining education as determined by the Secretary.”</p> <ul style="list-style-type: none"> <li>•</li> <li>• <b>Will</b></li> <li>• <b>the state provide access trainings through PaTTAN or other means?</b></li> <li>•</li> <li>•</li> <li>• <b>Will</b></li> <li>• <b>the state also provide access to materials for these topics so teachers across the state have access to the same level of training and resources?</b></li> <li>•</li> <li>•</li> <li>• <b>Will</b></li> <li>• <b>the state create a task force to address and guide how to ensure “cultural relevance” in professional learning opportunities?</b></li> <li>•</li> </ul>
<p>§49.18 (a) Assessment</p>	<p>“The Secretary will establish assessments...”</p> <ul style="list-style-type: none"> <li>•</li> <li>• <b>Will</b></li> <li>• <b>these assessments include performance assessments of skills or will they resemble what is currently used (PRAXIS). As stated above:</b></li> <li>• <b><i>“Many people can pass a test, though not all of them can actually teach nor relate to students. It is often those who have experienced the struggle in their path to understanding who are better able to support their students in their own journey.”</i></b></li> <li>•</li> </ul>
<p>§49.18 (a) (2) Assessment</p>	<p>“Assessments will measure the candidate’s abilities across the domains...employing a variety of measures at a minimum of three points:”</p> <ul style="list-style-type: none"> <li>•</li> <li>• <b>Who</b></li> <li>• <b>would administer these assessments across the various points?</b></li> <li>•</li> <li>•</li> </ul>

	<ul style="list-style-type: none"> <li>• From</li> <li>• the wording in this full statement, I would expect that the Danielson rubric adapted by PDE will be used. If not, what tool/rubric would be used?</li> <li>•</li> </ul>
§49.82 Instruction I (Certification)	<b>Does this section mean that teachers will leave teacher preparation programs WITH Instructional I certification?</b>

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