



Department of Educational Psychology,
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Dear Pennsylvania State Board of Education members,

I am writing on behalf of the faculty of the Pennsylvania State University special education teacher preparation program to express our grave concern and opposition to the proposed change to the eligibility for special education supervisory certification detailed in chapter 49.11. A key issue in the Chapter 49.11 revision is the disregard of teacher certification—enabling school psychologists to bypass teacher certification and yet still be allowed to supervise teachers, even if they have no experience teaching. This certification requirement is important and is evidenced by how the Pennsylvania Department of Education values special education preparation as it maintains special education teacher preparation as the only means for certification.

As part of Pennsylvania's special education teacher certification requirement, the content and field work in pre-service programs educate teacher candidates to meet the needs of all students in special education, to create interventions, to monitor progress, and more. In the classroom, special educators teach every day, as they learned to do in their teacher preparation programs. Preparation programs in school psychology do not provide opportunities to teach groups of students, write IEP goals and objectives, or create and help implement ways to accommodate learners in all settings. It is the differences in the preparation that makes the teacher certification so crucial to this matter. Yes, there are school psychologists in schools who share the same goals with teachers, especially in IEP meetings or MTSS teams. However, the perspective and lens used to view problems and achievements are shaped by their respective pre-service preparation.

The current special education supervisory certification requires that certified teachers teach for five years, honing their skills before they can complete a supervisory program and test and apply for supervisory certification. The special education supervisors have classroom experience and experience writing and implementing IEP goals. To remove the certification requirement, diminishes the role of the special education supervisor as a leader in the school. While school psychologists providing services to children, their role differs. Five years of experience in one field does not prepare you for another.

The revision creates a risk that some districts may recognize the salary saving potential of hiring school psychologist for both the pupil service supervisor and the special education supervisor. That role would be challenging for anyone, and the one-to-one supportive supervision of special education teachers would be lost.

The post baccalaureate programs across the state that prepare teachers for the Pennsylvania special education supervisory certification share a curriculum focus on matters essential to supervising special education teachers (e.g., law, IEP compliance, teacher observation, and professional development) so as to support all IEP eligible students. The supervisory certificate is not a stand-alone qualification. Rather it builds upon teachers' previous experience and preparation in educating special needs children, experience school psychologist lacks.

In conclusion, as it would not be appropriate for a special educator with five years of teaching experience and twelve credits in school psychology to practice as a school psychologist, so it is inappropriate to characterize school psychologists as special education teacher supervisors. Highly skilled professionals from different fields are not interchangeable.

Sincerely,

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