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Dear members of the State Board of Education,

As a special educator and a faculty member who has dedicated my career to preparing special education teachers and supervisors, I am surprised and dismayed by the revision in 49.11 that proposes school psychologist eligibility for special education supervisory certification. The current requirement has four components: Special education teacher certification, five years teaching, completion of an approved special education supervisory program, and passing designated testing. The proposed changes to Section 49.11 would alter two elements that I address here.

Certification in Special Education

The current requirement includes special education certification. One should not lightly brush aside the certification element to the requirements. The Pennsylvania Department of Education has a set of requirements that reflect the knowledge, skills, and classroom experience a future special educator must complete before obtaining Pennsylvania certification in special education. The Department sends a strong message about the value of such preparation by not permitting special education level one certification to be attained merely through testing. Our state is experiencing a shortage in special education teachers and the thoughtful, intentional change to the grade bands for certification were revised, but the content and field experience requirement were maintained. As a professional in the field, I am grateful for the demonstration of value and respect shown to teacher preparation. I ask that the same consideration and thought be given to the task of special education supervisor.

Five-year Teaching requirement

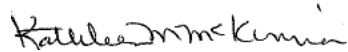
Special education teachers teach in a variety of settings every day. Across days and years their knowledge and experience give their teaching the depth and breadth that prepares them to assist and support other teachers in developing IEP goals and objectives, to implement instruction with fidelity, and to provide accommodations for learners in all settings. Special education supervisors need to practice and hone their skills as teachers before they may have the expertise to lead in special education settings.

Our university colleagues in school psychology prepare excellent school psychologists who play a vital role in the support and implementation of services to students in Pennsylvania. As a former classroom teacher and current faculty member, I understand that the collaborative and

interdisciplinary role the school psychologist plays on district teams is essential to student success. The intentional and well-designed training a school psychologist receives is excellent preparation for their unique responsibilities and roles working with students and other team members. But that training does not turn school psychologists into special educators, let alone supervisors of special education teachers. The roles on a team are not interchangeable. While special education teachers and school psychologists both serve on IEP teams and MTSS teams, their roles are not identical. School psychologists do not teach or spend time learning how to teach. Team members bring many different fields of expertise to the team. As an example, the general education teacher on the team may know evidence-based strategies, but does not received the same intervention-focused preparation for delivery and analysis as the special education teacher. Each member has a role and preparation for that role, and the blend of those different talents is crucial to a strong functioning team.

I appreciate the opportunity to personally express my opposition to the changes outlined in Chapter 49.11. I respect the high value the Department of Education has placed on special education and hope that it will maintain the high standards expressed in the current requirements for a special education supervisor certification in Pennsylvania.

Sincerely,

A handwritten signature in black ink that reads "Kathleen McKinnon". The signature is written in a cursive style with a clear, legible font.

Kathleen McKinnon, Ph.D.