



PAC-TE Feedback on Proposed Chapter 49 Revisions - January 17, 2021

Dear State Board of Education,

The Pennsylvania Association of Colleges and Teacher Educators (PAC-TE) is a nonprofit association for all those in Pennsylvania who are engaged in the preparation and development of teachers. We are dedicated to providing strong advocacy for teacher education within the Commonwealth of Pennsylvania, and by providing the collective voice to enable and support that work. We promote the development and implementation of quality programs designed to prepare professionals for PK-12 classroom teaching. Additionally, we promote opportunities for individual professional growth for the benefit of P-12 students across Pennsylvania.

PAC-TE is writing in support of revisions to Chapter 49 requiring the development of new competencies for culturally responsive and sustaining education (CR-SE) and professional ethics. While we feel that teacher education programs currently address these topic areas, the development of specific competencies will help the profession review and strengthen current curriculum in these vital areas. We hope and expect that PDE will reach out to stakeholders for input as specific program frameworks are developed.

There are specific revisions of the proposed changes to Chapter 49 that we would suggest:

- We oppose the addition of “cognitive competencies” in § 49.14. We currently center our programs on preparation to teach rigorous college and career-ready standards. However, the phrase “cognitive competencies” is not defined in the document and we consider it to be too vague and redundant with existing competencies to add value to current program frameworks. New competencies do require an extensive process of curriculum review and documentation and should only be added where they will clearly make a positive difference.
- Although we expect teachers of every subject to be teachers of reading, the structured literacy guidelines in § 49.14. should specifically be limited to Pk-4, Grades 4-8, and special education. They are not appropriate for secondary education or K-12 areas other than special education. In Chapter § 49.17 the requirement for training in structured literacy is specifically limited to elementary level teachers. This should also be the case in § 49.14.
- The proposed changes require annual reporting on admission, retention, and graduation of historically underrepresented groups, defined as “people of color, the economically disadvantaged, and first-generation college-goers” We favor limiting the new annual requirements to reporting on people of color in our programs. Collecting and reporting on these data are a critical first step in addressing the very low number of teachers of color in the commonwealth. We do not support annual reporting on economically disadvantaged students or first-generation college-goers. Generally, universities do not have good data on which students are first generation and so annual reporting of these data would likely be inaccurate. While financial aid offices typically have data on the

social economic status of students, they typically do not share these data with the academic departments and colleges that would be reporting to PDE. We feel adding this reporting requirement would remove an important element of privacy for our students.

- We oppose the change in § 49.111 that would allow school psychologists to become supervisors of Special Education. 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 overseeing special education teachers. School psychologists have no such requirement, and although schooled in assessment and legal issues, they do not have professional development or experience teaching groups of students, writing IEPs goals and objectives, or implementing best-practice accommodation for learners in all settings.

Finally, we want to thank the State Board of Education for seeking feedback throughout the process and specifically as changes are approaching finalization. The key sections of the proposal will make a positive difference. We hope that the specific areas of concern we have suggested above will help improve the final document.

Respectfully,

Dr. Gwyneth Price
President PAC-TE

Dr. John Ward
President-Elect PAC-TE