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Thank you for the opportunity to submit comments. I am writing this letter as the Dean of the College of Education and Social Work at West Chester University (WCU).

WCU is one of the 14 institutions comprising the Pennsylvania State System of Higher Education. WCU is also a member of PAC-TE, a nonprofit association for all those in Pennsylvania engaged in the preparation and development of teachers. We support the collective comments provided by PAC-TE and appreciate the opportunity to expand on a few points advocating for teacher education across the Commonwealth of Pennsylvania.

Main points:

- If these proposal changes adapt “the chapter to enhanc(e) educator preparedness by establishing new training requirements related to culturally responsive and sustaining education (CR-SE), structured literacy and professional ethics”, we must be clear on what those constructs distinguish. It is critical to operationize what “cultural awareness” means and that it is stated in an actionable, observable, and measurable manner.
- There is also a dramatic disparity in the allocations (\$26,000) for one person to develop additional trainings in mental wellness, trauma-informed instruction, cultural awareness, and virtual and technological engagement. Whereas, the support for providing training to current classroom educators at the elementary level in structured literacy is \$350,000 annually.
- Structured literacy concerns for teacher preparation is different for other areas of certification such as Secondary Education, Music Education, Health and Physical Education, etc. We would advocate that this concept is in addition to balanced literacy and specified for elementary grades as it is for teacher professional development.

- The definitions of under-represented groups is not clear as to whom this identifies based on race, gender, sex, first generation status, SES, etc. If we are asked to identify these populations, we must understand what happens with this information after it is provided and how are we using this information for program improvement.
- Ethics as professional standards are part of CAEP Standards under InTASC Standards, so it is already a component in many of our educator preparation programs. There does not seem to be much guidance on how this content is assessed from the state level.
- If assessments will be reviewed every 5 years that is not along the same cycle as other reviews. If a review were every 7 years, then it would align with other accreditation cycles.

Thank you for reviewing my feedback. If you would like to have further discussion, I would be happy to do so. I look forward to receiving the final revision of Chapter 49.

Sincerely,



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