



January 18, 2021

Ms. Karen Molchanow
Executive Director
State Board of Education
333 Market Street, 1st Floor
Harrisburg, PA 17126

Dear Ms. Molchanow:

Thank you for the opportunity to provide comments on the proposed amendments to Regulation #6-346: Certification of Professional Personnel.

My name is Kristen Waterfield and I am the CEO and Founder of The Malvern School, the largest privately-owned early childhood organization in the Philadelphia region. With 18 of our 27 schools located in Pennsylvania, we have provided families in Pennsylvania with more than 20 years of high-quality early learning experiences. As an educator at heart, my career started in the classroom and over the past 25 years, I've dedicated my life's work to lifting up the "Power of the Profession" in teachers while building a purpose-driven business that always puts the children first.

I am pleased to see that the proposed amendments to 22 Pa. Code Chapter 49, §49.85 only seek to codify the special education changes made in Act 82 related to special education.

I urge the State Board of Education to maintain the current grade spans as proposed in the amendments to Chapter 49 and make no further changes. As you consider the issue, we are providing our reasoning to maintain the current spans as follows:

- 1) It is essential that Pennsylvania teachers are well-trained in child development for the age group in which they are instructing. Broader certifications, which provide more marketability for teachers and greater flexibility for school administrators, are also unlikely to allow for a focus on specific developmental groups and the science around how these students learn. For instance, younger children are guided by their teachers in learning social skills like sharing and communicating appropriately, which are the foundations for all learning. Teachers need to be equipped not only to teach curriculum but also to understand how to instruct children in such a way to promote their development and well-being based on their development. **Teacher certification grade bands must reflect child development.**
- 2) There have been proposals for a K-6 span overlapping the pre-k-4 grade span. This would result in prospective teachers enrolling in the K-6 track for marketability. When this overlap existed a decade ago approximately 90 percent selected K-6 and only 10 percent pre-k-3. This significantly and very negatively reduces the pipeline of teachers available to provide

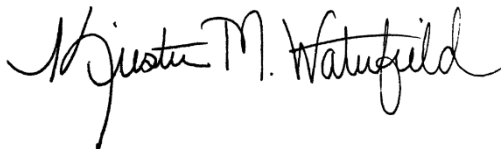
high-quality pre-k in school districts and in high-quality STAR 3 and 4 child care programs, nursery schools and Head Start programs. State investments to increase the number of children who have access to high-quality pre-k has been a bipartisan priority. This is evidenced by the \$145 million increase in funding for the Pre-K Counts and the Head Start Supplemental Assistance Programs since the beginning of the Wolf Administration. As more children are served, they will need many more pre-k-4 qualified teachers, not less.

I will continue our work to ensure the developmental and educational needs of each age group of children is the priority related to teacher certification grade spans.

I thank you and the State Board of Education for prioritizing children and youth as you considered this issue and put forth the proposed amendments to Chapter 49.

Please do not hesitate to contact me should you have any questions at 610-558-3700 or kristenwaterfield@malvernschool.com.

Sincerely,

A handwritten signature in black ink that reads "Kristen M. Waterfield". The signature is fluid and cursive, with the first name "Kristen" and last name "Waterfield" clearly legible.

Kristen M. Waterfield
CEO and Founder
The Malvern School