



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.

We are writing on behalf of The Malvern School, the largest privately-owned early childhood program in the Philadelphia region. We have 18 school locations in the state of Pennsylvania with additional locations in New Jersey, and just today, opened our overall 27th school location in Westtown, PA. The Malvern School was founded in 1998 with a philosophy to deliver a high-quality educational program for children between the ages of 6 weeks and 8 years. Much different than a daycare, our degreed teachers focus on your child's physical, emotional, and cognitive growth, and our curriculum is designed to meet or exceed the standards established by the National Association for the Education of Young Children (NAEYC), the nation's largest early childhood accrediting organization. Over the past 20 years, we have educated nearly 40,000 young children, and provided enriching careers to thousands of educators.

The Malvern School is part of a work group focused on Pennsylvania's teacher certification grade spans. We have worked together to ensure that the commonwealth's children and youth have teachers who are well-prepared in developmentally-appropriate practice and instruction for the age group/developmental period that they teach. We support Pennsylvania teacher certification grade spans that are aligned with research-based child and young adolescent development periods and oppose broader spans or those based on school building configuration, which undermine developmentally-appropriate practice and instruction.

The work group was initially formed in response to House Bill 1386, which was introduced in the 2017-18 legislative session. Early versions of the bill were of concern, as the legislation would have created grade spans with negative impacts on children in early childhood, as well as young adolescents, weighing school administration flexibility and convenience over what is best for children's developmental and educational needs. As a result, our group worked with the bill sponsor and key legislative staff to reach a compromise. Ultimately, the law (Act 82 of 2018) only changed the grade span for special education.

We were 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.

We 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 and young adolescents 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.

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

We 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 us should you have any questions at 610-558-3700 or info@malvernschool.com.

Sincerely,

The Malvern School