



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.

Trying Together supports high-quality care and education for young children by providing advocacy, community resources, and professional growth opportunities for the needs and rights of children, their families, and the individuals who interact with them. Trying Together is pleased to partner with PennAEYC to support the Pittsburgh Chapter of PennAEYC. Regionally in southwestern Pennsylvania, we offer professional growth opportunities including development courses, induction, coaching, mentoring, and conferences for early care and education professionals. Additionally, Trying Together, along with the Allegheny Intermediate Unit and the United Way of Southwestern Pennsylvania, provides strategic leadership by engaging school districts in Allegheny County through the Hi5! kindergarten transition program.

As an organization supporting the work of early childhood for children birth through age nine, Trying Together is part of a work group focused on Pennsylvania's teacher certification grade spans. We have worked together to ensure that the Commonwealth's young children have teachers who are well-prepared in developmentally appropriate practice and instruction for the age group/developmental period that they teach. The work group was initially formed in response to House Bill 1386, which was introduced in the 2017-2018 legislative session. Early versions of the bill were of concern as 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.

Trying Together is 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 support Pennsylvania teacher certification grade spans that are aligned with research-based child and young adolescent developmental periods and oppose broader spans or those based on school building configuration.

Additionally, we support many of the recommended changes – especially the addition of *Culturally Relevant and Sustaining Education* components for educator preparation programs, Induction, and continuing education for professionals. Our comments aim to strengthen the support for early childhood educators to best meet the needs of our youngest learners.

49.1 Definitions

Culturally Relevant and Sustaining Education (CR-SE)

Trying Together agrees that “Education that ensures equity for all students and seeks to eliminate systemic institutional racial and cultural barriers that inhibit the success of all Pennsylvania’s students — particularly those who have been historically underrepresented.” We commend the addition of CR-SE to ensure educators receive the knowledge and develop the skills for more equitable opportunities for all students. Currently, the definition lists the following competencies: mental wellness, trauma-informed approaches to instruction, technological and virtual engagement, and cultural awareness. We suggest including the following in the definition for CR-SE

- Equity – The NAEYC position statement, *Advancing Equity in Early Childhood Education*, highlights “Advancing equity in early childhood education requires understanding this broader societal context, these biases, and the ways in which historical and current inequities have shaped the profession, as they have shaped our nation.” Teachers are at the root of high-quality education. Children thrive and learn through supportive and caring relationships. We believe it’s important that equity be at the foundation of all the CR-SE competencies.
- Anti-bias and Anti-racism– Teachers have a responsibility to ensure their students are safe from racism and discrimination, especially while in their classroom and care. In order to effectively implement culturally relevant practices and curriculum, educators must have knowledge of anti-bias and anti-racism and be able to reflect on their own experiences and how it may impact their interactions with students.

We are pleased that CR-SE is referenced several times throughout Chapter 49 regulations and is now a requirement for educator preparation programs (49.14), induction (49.16), and continuing professional education through school entities (49.17).

Non-cognitive skills

In April 2019, Trying Together spoke at the public hearing and submitted written testimony to the Board of Education. When we shared comments on the draft regulations we commended the addition of “non-cognitive skills” under 49.1 Definitions. However, it does not appear that change made it into the final rulemaking and we suggest including the definition for non-cognitive skills. We believe it is important to further clarify the definition of non-cognitive skills and explicitly provide context to the components of non-cognitive skills. Therefore, in revising the Chapter 49 regulations, we believe it is

critical to take the opportunity to define developmentally appropriate practice, social and emotional skills, and play-based learning as major components of high-quality teaching, especially in grades pre-k through four.

As an accrediting body and professional membership organization, NAEYC is relevant to the Institutions of Higher Education and to early childhood educators throughout their career. In our recommendation to provide further clarification and definition to “non-cognitive skill” we referred to the NAEYC definitions for guidance.

- Developmentally appropriate practice or DAP refers to a framework of principles and guidelines for practice that promotes young children's optimal learning and development. DAP is a way of framing a teacher’s intentional decision making. It begins with three Core Considerations: 1) what is known about age-related characteristics of child development and learning, 2) what is known about the child as an individual, and 3) what is known about the social and cultural contexts in which the child lives.
- Social and emotional learning: major components to a young child’s learning and development that are rooted in positive interactions between the adult and child. Social and emotional skills provide a sense of identity and self-regulation skills that lead help children communicate their thoughts and feelings in a healthy, positive way.
- Play-based learning: the approaches to learning through play standard in the PA Standards for ECE outlines the ways in which children learn and develop the cognitive, social, emotional, and physical skills through hands-on, active learning experiences.

49.14 Approval of institutions and alternative program providers

In April 2019, we supported the recommended revision for approval institutions to include reporting on diversity. According to the LPI report, the percentage of teachers of color in Pennsylvania’s teacher workforce is currently at 5.6%, which is far below the national average of 20% and the percentage of students of color (33.1%) enrolled in the state’s public schools. In addition to race/ethnicity, we urge for the data to be disaggregated by gender, age, and languages spoken. We also believe that knowing the breakdown of the teacher demographic data by grade level will be helpful to see what grade levels and content areas are lacking diversity as we know representation is important along the educational journey. Specifically, for young children developing their own sense of identity and belonging, it is essential that they have relationships with teachers who they can identify with. The diversity reporting change is not in the Chapter 49 language or the proposed final rulemaking. We suggest reconsidering the addition of this reporting.

49.16 Approval of induction plans

Our organization provides a teacher induction program to new pre-k teachers. Our program is popular because we have the pre-k expertise aligned with the Pennsylvania Learning Standards for Early Childhood, Keystone STARS, NAEYC, and the Danielson Framework. As we consider competencies for induction plans it is important to focus on the process-oriented versus the content (which often has been covered by the higher education institution teacher preparation program). Beyond covering competencies focused on cognitive skills, a focus on the non-cognitive competencies is of utmost importance. This includes social and emotional skills, equity and inclusion, professionalism and ethics, systems understanding, and the importance of collaboration with colleagues.

We believe that the two year induction program will be particularly helpful on the mentoring end of the program.

49.83 Instructional II

One component of teacher certification that has become even more critical is the funding for teachers to pursue the required 24 post bac credits. There are very limited resources out there and most teachers already have incurred debt from their undergraduate work. TEACH funding is very limited and not available to many programs. The PDO funding does not pay for Master level coursework. What many of the teachers end up doing is taking Continuing Professional Education courses through various intermediate units because they are cheaper - however they do not advance the educator's career path toward a Masters. Or they take random undergraduate courses, again, not moving them forward in their degree work. So many of our inductees really struggle with paying for their 24 post bac credits. As we witness many teachers struggle with this and we understand the detrimental effect of teacher shortages and turnovers, we recommend:

- Investments in The T.E.A.C.H. (Teacher Education And Compensation Helps) Early Childhood® PENNSYLVANIA Scholarship and Risings Stars programs to offer scholarships, tuition assistance, and support systems that improve the education and compensation of early childhood teachers.
- Explore why professionals are leaving the field and find solutions to remedy the problem of turnover. Supporting teachers in the first few years is critical to keeping teachers in the classroom.

49.85 Limitations

As previously mentioned, we are pleased that there are no proposed changes to grade span certification other than aligning the regulations with the Special Education certificates under the act enacted by the act of October 19, 2018 (P.L. 545, No. 82). 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. Young adolescents are unique because at this age they experience changing brain and hormonal developmental processes and identity development, along with the impacts of environmental factors such as social media and teen suicide. 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 and young adolescent 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.
- 3) A general K-6 certificate prevents certified teachers from comprehending the unique developmental changes inherent in young adolescents – students from ages 10-15. Middle level teachers (grades 5-8) should receive specialized courses in young adolescent development, effective middle level instructional, curricular and assessment processes and specific coursework in effective middle school design.
- 4) Additional changes to grade spans would come at a cost. They would be borne not only from limited public funds through the Pennsylvania Department of Education (PDE) and Pennsylvania's State System of Higher Education institutions, but also state-related and private higher education institutions required to create new certification programming and related informational/promotional materials.

- 5) Prior proponents to change the grade spans cited general teacher shortages as the reasoning. However, there are two existing avenues to address these concerns. As you know, there is currently a process outlined in Chapter 49 (22 Pa. Code §49.85(d)) which allows the Secretary of Education to grant exceptions to the grade and age level limitations for individual teachers on a case-by-case basis. This process is certainly appropriate for those individual districts that are struggling to meet all requirements for teacher assignment and is in use now for those limited areas of teacher shortages in specific areas of content or expertise. In addition, proponents of broader grade spans cite specific concerns about shortages of fifth and sixth grade teachers. PDE already offers a grade 5-6 testing add-on option for pre-k-4 certificate holders. Completion of the following two test modules in grades 4-8 is required.
- The Grades 4-8: Module 2 – English Language Arts and Social Studies (5154)
 - The Grades 4-8: Module 3 – Mathematics & Science (5155)

We do not believe that testing alone is sufficient preparation for teaching in grades 4-8 and that training should be included to prepare teachers to effectively instruct on new areas of young adolescent development. However, this testing-only option currently exists as a remedy and most likely teachers will need to seek some professional development and readings in order to pass the two test modules

Trying Together 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 are committed to diversity, equity, and inclusion in the field of early childhood education, and the important role of culturally relevant competencies of future and current educators.

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

Sincerely,

A handwritten signature in cursive script that reads 'Cara Ciminillo'.

Cara Ciminillo, Executive Director