



# Wilkes University



January 18, 2021

Ms. Karen Molchanow  
Executive Director  
State Board of Education  
333 Market Street, 1<sup>st</sup> 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.

I am a full-time assistant professor at Wilkes University in Wilkes-Barre, PA. Currently, I teach in the undergraduate department and am the coordinator of our fully online degree completion pathway towards P.A. P-4 certification. Wilkes University's School of Education is comprised of our undergraduate department, and graduate and doctoral departments. I am writing with the approval and support of the chairs of all departments along with the dean of the School of Education, Dr. Rhonda Rabbitt.

Myself, along with a number of other Wilkes University faculty are 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. 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.

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 me should you have any questions at:  
[amy.hnasko@wilkes.edu](mailto:amy.hnasko@wilkes.edu) or (570) 408-3914.

Sincerely,



Amy Hnasko, Ed.D., with the support of the Wilkes University School of Education dean, chairs and faculty