



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.

As an educator and advocate, supporting the work of early childhood for children birth through age nine, I am 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.

I have been 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 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.

Due to the military service of my husband, I have taught and administered in early childhood and elementary settings in various locations. I also currently teach in higher education, and am an elected member of my local school board. I see the impact of potential shifts in Chapter 49 through these various lenses and hope that sharing this insight will be of benefit for future decision-making.

As a former early childhood teacher and administrator, I have a concern for reintroducing grade bands that do not include prekindergarten or other years before kindergarten. On one hand, the Commonwealth of Pennsylvania celebrates early childhood through various initiatives such as Pre-K Counts, state funded Head Start, child care subsidy, and the like. Eliminating or giving options such as K-6 certification without the integral developmental knowledge of how to meet needs of children during some of the most impactful years of brain development (before age 5) (NAEYC, 2009) reduces the number of qualified educators in this sector of education. I am very aware of the challenges facing those who work with children of this age, such as low wages, working year-around, working longer

shifts, and lack of respect from the field, but those issues should be addressed separately in an urgent way, not marginalized by encouraging educators to follow a path that only leads to elementary settings and abandons the early years.

As a faculty member in higher education, I see a detriment to shifting grade span options now. When students are choosing a major field of study, the last thing they want to see is turbulence in expectation, job availability, and shifting course requirements. Every time the grade bands change, the national trend (Saunders, 2018) of teacher shortages is exacerbated, and we lose students who might enter the field due to volatility and uncertainty. The current grade bands have not been in effect long enough to know the true impact on the education of our students and the children they will or do serve. In addition, the current grade bands of early childhood, middle level, and secondary education allow for higher education faculty to teach content relative to the developmental age of the students each preservice teacher will encounter. Children are not one-size-fits-all, and need to be honored for the needs that they have at each stage of development by teaching them with developmentally appropriate methods that match their needs and abilities.

The final perspective I share with you is as a school board member. My primary responsibilities in this role include: being a representative of the community, a leader of the district, a steward both of my district's children and its tax dollars, and an advocate of public education and an educated public. These roles, as articulated by the Pennsylvania School Board Association, are ones that I take very seriously. I disagree with PSBA's stance on Chapter 49, however, and purport that moving to a proposed statewide structure for teacher certification that weighs school administration flexibility over alignment with the developmental and educational needs of each age group of children and young adolescents is concerning. There are currently processes for districts to address teacher shortages, and there are no data to support that there is a problem with the current certificate ranges commonwealth-wide. My first priority as a school board member is to ensure that every child in my district receives a quality education. It is time to put the developmental needs of children ahead of the desires of adults when they conflict, so that we can serve our students to the best of our capabilities. Keep the grade bands as they are currently divided, allow additional endorsements to allow for greater flexibility as well as enhanced content knowledge to support student learning at varying stages of development, and make a priority the needs of those who cannot advocate on their own behalf- our children.

49.85 Limitations

As previously mentioned, I am 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). 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, I provide my 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)

I 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

I will continue my 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. I am 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.

I 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. Please do not hesitate to contact me if you ever wish to discuss these matters. My cell phone number is 570-574-1398 and my email address is lori.cooper@wilkes.edu.

Sincerely,

Lori Cooper

Dr. Lori Cooper

Associate Professor of Doctoral Education, Wilkes University