

## Public Comment Concerning the Proposed Educator Certification Regulations

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My name is Thomas DeFranco and as Dean of the Neag School of Education at the University of Connecticut I want to thank you for the opportunity to contribute to the public record of commentary on the approval of the state educator certification regulation changes proposed by the Connecticut State Department of Education.

The Neag School of Education is a nationally recognized teacher preparation institution. Our faculty have well-developed expertise in the preparation of highly-qualified and effective teachers and school leaders and we have adopted a continuous improvement culture that relies on data to inform our decisions and our programmatic improvements.

Speaking on behalf of the Neag School, I have a number of major concerns about the following proposed regulations and will address each separately.

- First, the Literacy Specialist PK – 12.

In regard to the certification requirements for the Literacy Specialist PK – 12, we question requiring 12 credit hours for the Professional Educator Certificate that by National Standards are required for the Initial preparation. This plan does not appear to be in line with National Standards.

- Second, the Gifted and Talented endorsement.

We recommend adding the following language:

This endorsement shall be required for anyone employed as a gifted and talented teacher for more than 20% of a full-time assignment. A person teaching in gifted and talented education shall be required to hold a teaching endorsement and have a combination of two years of experience teaching and nine credits in the areas such as (1) Introduction to gifted education; (2) Identification and assessment of gifted and talented, (3) Curriculum and instruction for gifted learners.

- Third, the elimination of the initial certification in special education.

Special education is a critical shortage area, within the state of Connecticut and nationwide. According to the NEA, the number of U.S. students enrolled in special education programs has risen 30 percent over the past ten years. We are concerned that the new regulations will result in a more dire shortage, particularly in Connecticut. There is no evidence that creating an advanced

certificate in special education will draw individuals who are currently certified in elementary or secondary education to special education, and we are particularly concerned about this assumption at the secondary level. If you were a high school chemistry teacher, would you decide to change your career and go back to school to become a special education interventionist?

We also believe that the elimination of the initial certification in special education will create a brain drain of CT high school students who are most interested in teaching students with special needs. Young people who are passionate about this work will be required to seek initial certificates elsewhere and teach out of state. Don't we want to keep our most outstanding and talented students, and particularly those who want to work with individuals with disabilities, here in our state?

While some teacher preparation programs may restructure to meet the requirements of both elementary/secondary certification and the special education interventionist certification that are laid out in the proposed regulations, we believe that any such program will either be watered down or will require an inordinate amount of post-secondary education prior to entering the job market. We believe that any program that would effectively prepare someone to be a certified elementary school teacher and a special education interventionist would take a minimum of six years. College costs is a great concern of our students and their families. A six-year post-secondary education program will not meet the needs of the students and thus further exacerbate the shortage of candidates in the special education program.

Lastly, the elimination of the initial certification in special education has a significant impact on colleges and universities that are currently staffed to provide comprehensive initial certification programs. The Neag School of Education has one of the most recognized and productive special education faculties in the country and they are committed to working with K-12 schools and teachers and preparing new special educators. Connecticut's other universities also have strong special education faculty. Are we really ready to continue to pay these experts only to waste some aspects of their expertise by not allowing them to prepare new special educators? Further, is the state willing to fund the extensive programmatic revisions that would be required to create new programs to prepare advanced level interventionists? The cost of the program development will most certainly fall on the colleges and universities at a time when the state budget is very tight and universities across Connecticut are being asked to exercise fiscal constraint.

On September 23, 2008, the Connecticut State Department of Education invited Dr. Michael L. Hardman, Dean, College of Education at University of Utah, to share his thoughts on the integrated special education model. When he was asked if he believed that a state should completely eliminate the initial special educator certification program, Dr. Hardman answered: "No!"

On October 22, 2008, Dr. Walter Kimball from the University of Southern Maine, another Connecticut State Department of Education invited expert, was asked the same question. His answer was the same as Dr. Hardman's—a resounding “No!”

For the above reasons, we concur with the experts hired by the Connecticut State Department of Education and believe the elimination of the initial certification in special education is ill-advised and could lead to disastrous results.

- Fourth, the proposed regulations continued focus on courses and credits rather than on teacher competencies.

The proposed system continues to include a focus on counting inputs, dictating courses, course content, and credits, instead of a focus on assessing outcomes. The national trend and best practice in teacher preparation are centered on assessing outcomes as the main indicators of program quality. Current required inputs do not always lead directly to the outcomes that are laid out in such documents as the Common Core of Teaching. The addition of more required courses and credits leads us to eliminate other courses that may have great value to “make room” for required courses. The end result is a ‘full’ program, stuffed with courses, some of which have little value in forming and shaping teacher competence. CSDE should be the lead in revisiting and revising statutes that may no longer have critical importance for tomorrow’s teachers.

If the focus of certification shifted toward best practice, that is, the assessment of outcomes, colleges and universities would have the freedom to design and manage programs that will lead to the preparation of highly effective teachers who will improve student achievement at the K-12 level.

While the Neag School of Education appreciates the Option A that allows for certification of students who complete nationally recognized programs, the technical issue of national recognition with conditions remains problematic. If the national accrediting body is willing to fully recognize a program that has conditions, why does the CSDE insist that no conditions are in place. Conditions simply require continued program assessment and improvement – a set of activities to which all good programs adhere.

In closing, we encourage the leadership of the CSDE to engage all stakeholders in a process to move beyond simple alignment of the state teacher competencies with the Common Core of Teaching and NCATE standards to the adoption of a common language and reconciliation of separate documents into one cohesive document. The challenge before us is for the public to understand requirements for effective teaching. While we applaud efforts toward alignment, alignment isn’t enough. These documents/conceptual frameworks should be merged to represent one set of

comprehensive competencies that all teachers, administrators, and other school professionals are required to demonstrate, so all entities are clear that we have common goals and common frameworks to follow in CT.