

# PAC-TE

The Pennsylvania Association of Colleges and Teacher Educators (PAC-TE) is pleased to have the opportunity to provide information on behalf of teacher preparation programs in Pennsylvania. This testimony addresses the application of the University of Southern California (USC) in Los Angeles, California to have a Certificate of Authority issued by the Pennsylvania Department of Education approving the operation of the USC Rossier School of Education, by contract with 2tor, Inc., to offer its program in teaching leading to a Master of Arts in Teaching (MAT) degree online, with the Guided Practice portion of the program to be conducted in Harrisburg, Pittsburgh, Philadelphia, Mifflintown and West Grove, Pennsylvania.

After a review of the application PAC-TE has the following concerns with the Master of Arts in Teaching with credential program as proposed by the University of Southern California:

1. From a review of the proposed programs, they do not appear to be aligned with Chapter 49.2 guidelines with respect to coursework in special education and working with English Language Learners (ELL). It is our position that since the commonwealth believes that it is imperative for all initial teacher preparation programs to have a knowledge of these two areas, that all programs operating within Pennsylvania that lead to an initial teaching certification, whether at the undergraduate or graduate level, must be held to compliance with the same guidelines as delineated in Chapter 49.2.

2. One of the proposed programs, the Master of Arts in Teaching (Multiple Subjects) is identified as an elementary (K-6) teaching credential. While it is noted that the USC application indicates that their program is seeking to credential candidates for California certification, it must be noted that, as of August 31, 2010, the opportunity for higher education institutions in Pennsylvania to offer this credential will no longer exist and will be replaced by two new

# PAC-TE

certifications: PK-4 and 4-8. Consideration and/or approval of a program that is consequently out of line with the new certification designations in Chapter 49.2 obviates the validity of those guidelines and diminishes the value of the hard work put into the initial new program approval process undertaken by teacher preparation programs in Pennsylvania. To date, 78 PK-4 programs and 43 4-8 programs have been submitted to PDE for approval. Furthermore, given the reciprocity between California and Pennsylvania, it is quite likely that candidates who participate in the USC program will seek employment in Pennsylvania and therefore will not have a certificate that is recognizable in Pennsylvania.

3. It appears that The Guided Practice component of the program does not meet the rigorous and stringent field experience and student teaching requirements established in Chapter 354 standards and the Chapter 49.2 certification program guidelines. There is no evidence that the rigor of a twelve week student teaching experience under the supervision of a teacher preparation faculty member is to be conducted, nor is there an indication that assessment of instructional effectiveness will be measured by an instrument such as the Pennsylvania Department of Education Form 430, all requirements for initial certification in Pennsylvania.

4. The USC proposal indicates that they would contract with school districts in the identified areas for the guided practice portion of their program. It must be pointed out here that, given over 90 teacher preparation programs currently in Pennsylvania, all adhering to Pennsylvania guidelines, an intrusion by an institution from outside the state, with no regard to Pennsylvania certification guidelines while preparing teachers for positions in another state is likely to take away from the number of field experience sites available to candidates enrolled in teacher preparation programs in Pennsylvania. The five locations identified by the USC proposal for guided practice experiences are already being utilized by approved teacher education programs, and additional placement requests from the USC program would drain human and physical plant resources needed to support the teacher certification candidates from these programs. Indeed, when PAC-TE

# PAC-TE

surveyed its membership in August and September, 2010 to assess levels of satisfaction with the new Chapter 49.2 teacher certification program approval process implemented by the Pennsylvania Department of Education, respondents to the survey emphasized that their K-12 partners in basic education are presently unprepared to accommodate the need for these new certification programs to meet the mandate for certification candidates who are required to accumulate a total of 190 field experience hours prior to their student teaching semesters as our education partners are coming under increasing pressure from their constituents to limit the number of hours their child is not instructed by the district employed teacher of record.

5. It is our view that any program operating within Pennsylvania that offers an initial teaching certification, regardless of delivery mode, must be subject to the rigorous program review process established by the Pennsylvania Department of Education. We are not opposed to the Department of Education adding additional institutions to offer initial certification of teaching professionals; however, we are adamant that if the Pennsylvania Department of Education approves ANY applications for programs leading to a teaching credential, then this program must be held to the same high standards and rigorous review process currently required of all Pennsylvania institutions.

6. On September 27, 2010, a United States Department of Education regulation under No Child Left Behind (NCLB) was overruled by the United States Court of Appeals for the Ninth Circuit, whose jurisdiction includes Alaska, Arizona, California, Guam, Hawaii, Idaho, Northern Mariana Islands, Montana, Nevada, Oregon, and Washington State. The court ruling indicates that an NCLB provision for teachers in training to be considered highly qualified relaxed the definition of the term in excess of its stated provisions: possession of an undergraduate degree, full state licensure, and proof of subject matter knowledge. The court ruling consequently obviates a 2002 Department of Education regulation that allowed for the employment for up to three years of alternative

# PAC-TE

route teacher certification candidates, essentially, intern teachers. Therefore, based on this court ruling, the USC proposal, unlike the Pennsylvania teacher preparation institutions, will not prepare high qualified teachers. Why, then, would Pennsylvania public schools want to have their students instructed by interns from a program that does not meet the definition of “highly qualified?”

7. According to the University of Southern California's proposal, it intends to prepare its program graduates for California teaching licensure. The New York Times disclosed in an article published on April 20, 2010, that public school districts in California sent layoff notices to 22,000 teachers during the 2009-2010 school year. In the Los Angeles Unified School District (in which the University of Southern California is located) alone Superintendent Ramon Cortines was forced to send layoff notices to 5,200 teachers. He lamented that a continuation of budget cuts appears to be likely through the 2014-2015 school year. Preparing teacher candidates to enter a workforce in a state where schools sent out 22,000 layoff notices in 2010 would be an unfair and unethical practice, as program graduates would be entering an employment arena where layoffs are administered to the least senior teachers; graduates of the proposed program would become the least of the least senior job seekers which will force them to look for employment in other states, and having done their student teaching in Pennsylvania, it would seem logical that they would seek employment here even though they do not have them same high quality preparation as those candidates prepared in Pennsylvania institutions.

8. The proposed program is designed to prepare teachers for elementary grade classrooms, grades Kindergarten through 6. As our second concern points out, this soon-to-be obsolete certification in Pennsylvania is recognized as a program whose supply exceeds its demand. This oversupply was the primary reason cited by the Pennsylvania Department of Education for initiating the change in certification levels. By accepting the USC program in our state, Pennsylvania would continue adding to a supply of elementary grades teachers and does no

# PAC-TE

service toward the preparation of teachers in high needs areas including special education aligned with early grades, middle grades, or secondary subject matter areas, English language learners, mathematics, and science. In addition, with no formal training in the areas of special needs and English language learners, these (the USC) candidates would be disadvantaged in seeking employment in the very state where they conducted their preservice teaching.

PAC-TE and its membership have worked with the Department of Education over the past several years to develop program guidelines and a review process to ensure the development of high quality teacher preparation programs that prepare teachers to positively impact student learning. The credential programs described in the application submitted by University of Southern California must be held to these exact standards. Your consideration of this testimony is greatly appreciated.