

2010 State Teacher Policy Yearbook



National Council on Teacher Quality

#### **Acknowledgments**

#### **STATES**

State education agencies remain our most important partners in this effort, and their extensive experience has helped to ensure the factual accuracy of the final product. Although this year's *Blueprint for Change* did not require the extensive review typically required of states, we still wanted to make sure that states' perspectives were represented. As such, each state received a draft of the policy updates we identified this year. We would like to thank all of the states for graciously reviewing and responding to our drafts.

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### About the Yearbook

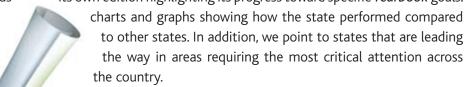
Each report also contains

The 2010 *Blueprint for Change* is the National Council on Teacher Quality's fourth annual review of state laws, rules and regulations that govern the teaching profession. This year's *Yearbook* takes a different approach than our past editions, as it is designed as a companion to the 2009 *State Teacher Policy Yearbook*, NCTQ's most recent comprehensive report on state teacher policies.

The comprehensive *Yearbook*, a 52-volume state-by-state analysis produced biennially, examines the alignment of states' teacher policies with goals to improve teacher quality. The 2009 report, which addressed key policy areas such as teacher preparation, evaluation, alternative certification and compensation, found that states had much work to do to ensure that every child has an effective teacher. Next year we will once again conduct a comprehensive goal-by-goal analysis of all aspects of states' teacher policies.

In 2010, an interim year, we set out to help states prioritize among the many areas of teacher policy in need of reform. With so much to be done, state policymakers may be nonplussed about where to begin. The 2010 *Yearbook* offers each state an individualized blueprint, identifying state policies most in need of attention. Although based on our 2009 analyses, this edition also updates states' progress in the last year, a year that saw many states make significant policy changes, largely spurred by the Race to the Top competition. Rather than grade states, the 2010 *Blueprint for Change* stands as a supplement to the 2009 comprehensive report, updating states' positive and negative progress on *Yearbook* goals and specifying actions that could lead to stronger policies for particular topics such as teacher evaluation, tenure rules and dismissal policies.

As is our practice, in addition to a national summary report, we have customized this year's *Blueprint for Change* so that each state has its own edition highlighting its progress toward specific *Yearbook* goals.



We hope that this year's *Blueprint for Change* serves as an important guide for governors, state school chiefs, school boards, legislatures and the many advocates seeking reform. Individual state and national versions of the 2010 *Blueprint for Change*, as well as the 2009 *State Teacher Policy Yearbook*—including rationales and supporting research for our policy goals—are available at www.nctq.org/stpy.

## Blueprint for Change in Pennsylvania

he 2009 State Teacher Policy Yearbook provided a comprehensive review of states' policies that impact the teaching profession. As a companion to last year's comprehensive state-by-state analysis, the 2010 edition provides each state with an individualized "Blueprint for Change," building off last year's Yearbook goals and recommendations.

State teacher policy addresses a great many areas, including teacher preparation, certification, evaluation and compensation. With so many moving parts, it may be difficult for states to find a starting point on the road to reform. To this end, the following brief provides a state-specific roadmap, organized in three main sections.

- Section 1 identifies policy concerns that need critical attention, the areas of highest priority for state policymakers.
- Section 2 outlines "low-hanging fruit," policy changes that can be implemented in relatively short order.
- Section 3 offers a short discussion of some longer-term systemic issues that states need to make sure stay on the radar.

### **Current Status of Pennsylvania's Teacher Policy**

In the 2009 State Teacher Policy Yearbook, Pennsylvania had the following grades:



Area 1: Delivering Well Prepared Teachers	D+
Area 2: Expanding the Teaching Pool	C-
Area 3: Identifying Effective Teachers	D
Area 4: Retaining Effective Teachers	D+
Area 5: Exiting Ineffective Teachers	D-

#### 2010 Policy Update:

In the last year, many states made significant changes to their teacher policies, spurred in many cases by the Race to the Top competition. Based on a review of state legislation, rules and regulations, NCTQ has identified the following recent policy changes in Pennsylvania:

No recent policy changes were identified.

#### Pennsylvania Response to Policy Update:

States were asked to review NCTQ's identified updates and also to comment on policy changes that have occurred in the last year, other pending changes or teacher quality in the state more generally.

Pennsylvania noted that it plans to introduce new content certification tests for elementary teachers beginning September 2011 and that candidates must pass each of the three modules that will comprise the assessment. The first module tests pedagogy; the second includes language arts and related areas; and the third one combines math, science and related areas. Pennsylvania is also in the process of developing a new modular basic skills test to align more clearly with expectations of key competencies. Further, the state indicated that it has developed more specific and rigorous professional core competencies, which will be tested for all certification programs, including secondary programs.

Pennsylvania is also redesigning its process for reviewing educator preparation programs, which will include collecting data on college admissions and test scores for all candidates. The state added that its current review process examines the qualifications of the faculty responsible for the material and emphasizes the need for involvement of arts and sciences faculty. This process will continue in the new full review process, which includes an online data program.

In addition, Pennsylvania pointed out that it is working toward including post-secondary education candidates in the state's longitudinal data system (PIMS), which will allow Pennsylvania to track and study a large group of candidates from high school into their teaching careers. The state has issued specific guidelines for postsecondary education that emphasize the admissions process and policies, and over time it will be able to establish standards for this area, which will be further enhanced by the reporting requirements for Title II. As of April 2010, all IHE-based teacher preparation programs and all alternative teacher preparation programs must complete the same report for Title II as traditional teacher preparation programs.

Pennsylvania also noted that out-of-state candidates are no longer required to complete six credits of mathematics and English, stating that "this policy allows all applicants to be evaluated equitably through the same requirements." There is also no longer a requirement that student teaching be transcripted by an institution of higher education: "Required transcripting can pose a barrier to educators who have completed alternative certification programs." Pennsylvania indicated that alternate route candidates with three years of experience will be granted an equivalent certificate. The state also allows alternate routes to certification, including those provided by national teacher training programs, as long as they incorporate a classroom teaching component. In addition to developing the Teacher Information Management System (TIMS) to modernize and streamline the certification process, Pennsylvania is developing a statewide teacher and principal evaluation system to advance effectiveness by providing interventions and support systems to address deficiencies, creating compensation systems that award effectiveness and establishing a fair and objective process for removing ineffective teachers and principals.

### **Section 1: Critical Attention Areas**

This section identifies the highest priority areas as states work to advance teacher quality. These are the policy issues that should be at the top of the list for state policymakers. While other states need also to address middle school teacher preparation, Pennsylvania should turn its immediate attention to the following ten issues.



## Critical Attention: Pennsylvania policies that need to better connect to teacher effectiveness

**ENSURE THAT TEACHER EVALUATIONS ASSESS EFFECTIVENESS IN THE** CLASSROOM:

Evaluation is a critical attention area in

states.

States on the right track include Colorado, Louisiana and Rhode Island.

The fundamental purpose of teachers' formal evaluations should be to determine whether the teachers are effective in the classroom. To achieve this purpose, evaluations must be based primarily on teachers' impact on students. While it is certainly appropriate to

include subjective factors, such as classroom observations, Pennsylvania should adopt a policy that requires objective evidence of student learning—including but not limited to standardized test scores—to be the preponderant criterion of teacher evaluations.

In addition, to ensure that the evaluation instrument accurately differentiates among levels of teacher performance, Pennsylvania should require districts to utilize multiple rating categories, such as highly effective, effective, needs improvement and ineffective. In its application for Race to the Top, the state suggests titles of overall performance rating categories for its model system: entry, emerging, achieving, highly effective I and highly effective II. These are inadequate because none denotes a level of poor performance.

#### **CONNECT TENURE DECISIONS TO** TEACHER EFFECTIVENESS:

The point at which a teacher's probationary period ends, commonly referred to as tenure, should be a significant milestone. Although the awarding of tenure is

a local decision, state policy should reflect the fact that tenure should only be awarded to teachers who have consistently demonstrated their effectiveness. Pennsylvania should require a clear process, such as a hearing, for districts to use when considering whether a teacher

Tenure is a critical attention area in

states

States on the right track include Colorado, Delaware and Rhode Island.

advances from probationary to permanent status. Such a process would ensure that the local district reviews the teacher's performance before making a determination. Pennsylvania should also ensure that evidence of effectiveness is the preponderant criterion for making tenure decisions. In addition, the current policy of granting tenure after just three years does not allow for the accumulation of sufficient data on teacher performance to support meaningful decisions. Extending the probationary period—ideally to five years—would prevent effective teachers from being unfairly denied tenure based on too little data and ineffective teachers from being granted tenure prematurely.

## PREVENT INEFFECTIVE TEACHERS FROM REMAINING IN THE CLASSROOM INDEFINITELY:

Pennsylvania should explicitly make teacher ineffectiveness grounds for dismissal so that districts do not feel they lack the legal basis for terminating consistently poor performers, and it should steer clear of euphemistic terms that are ambiguous at best and may be interpreted as concerning dereliction of duty rather than ineffectiveness.

Nonprobationary teachers who are dismissed for any grounds, including ineffectiveness, are entitled to due process. However, cases that drag on for years drain resources from school districts and create a disincentive for districts to attempt to terminate poor performers.

Dismissal is a critical attention area in

46 states.

States on the right track include Oklahoma and Rhode Island.

Therefore, the state must ensure that the opportunity to appeal occurs only once and only at the district level and involves only adjudicators with educational expertise.



<sup>1</sup> The District of Columbia has no state-level policy, but District of Columbia Public Schools requires that student academic achievement count for 50% of evaluation score.

<sup>2</sup> Legislation articulates that student growth must account for a significant portion of evaluations, with no single criterion counting for more than 35% of the total performance evaluation. However, the State Board is on track to finalize regulations that limit any single component of student growth, such as standardized test scores, to 35%, but add other measures of student progress for a total of 50%.



## **Critical Attention: Pennsylvania policies** that fail to ensure teachers are well prepared

#### **ENSURE THAT ELEMENTARY TEACHERS** KNOW THE SCIENCE OF READING:

Although Pennsylvania requires that its teacher preparation programs provide teacher candidates with training in the science of reading, the state should also require an assessment prior to certification that tests whether teachers indeed possess the requisite knowledge in scientifically based reading instruction. Ideally this would be a stand-alone test (such as the excellent assessments required by Massachusetts, Connecticut and Virginia), but if it were combined with general

Preparation to teach reading is a critical attention area in

states.

States on the right track include Connecticut, Massachusetts and Virginia. pedagogy or elementary content, the state should require a separate subscore for the science of reading.

#### **ENSURE THAT ELEMENTARY TEACHERS** • KNOW ELEMENTARY CONTENT MATH:

Aspiring elementary teachers must begin to acquire a deep conceptual knowledge of the mathematics they will teach, moving well beyond mere procedural understanding. Leading mathematicians and math educators have found that elementary teachers are not well served by mathematics courses designed for a general audience and that methods courses do not provide sufficient content preparation. Although Pennsylvania's standards address areas such as algebra, geometry and statistics, the state should specifically articulate that preparation programs deliver mathematics content geared to the explicit needs of elementary teachers. Pennsylvania should also adopt a rigorous mathematics assessment, such as the one required by Massachusetts. At the very least, the state should con-

sider requiring a mathematics subscore on its general content knowledge test, not only to ensure that teacher candidates have minimum mathematics knowledge but also to allow them to test out of coursework requirements.

Preparation to teach mathematics is a critical attention area in

states.

A state on the right track is Massachusetts.

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# 6. ENSURE THAT TEACHER PREPARATION PROGRAMS ARE ACCOUNTABLE FOR THE QUALITY OF THE TEACHERS THEY PRODUCE:

States should consider factors related to program performance in the approval of teacher preparation programs. Although the quality of both the subject-matter preparation and professional sequence is crucial, there are also additional measures that can provide the state and the public with meaningful, readily understandable indicators of how well programs are doing when it comes to preparing teachers to be successful in the classroom. Pennsylvania should make objective outcomes that go beyond licensure pass rates, such

as graduates' evaluation results, retention rates and students' academic achievement gains, a central component of its teacher preparation program approval process, and it should establish precise standards for program performance that are more useful for accountability purposes.

Teacher preparation program accountability is a critical attention area in

30 states.

States on the right track include Colorado and Louisiana.

- 1 Although California has a standalone test of reading pedagogy, the ability of this test to screen out candidates who do not know the science of reading has been questioned.
- 2 Florida's licensure test for elementary teachers includes a strong focus on the science of reading but does not report a separate subscore for this content.



## Critical Attention: Pennsylvania policies that license teachers who may lack subject-matter knowledge

#### **CLOSE LICENSURE LOOPHOLES TO** ENSURE THAT TEACHERS KNOW THE **CONTENT THEY TEACH:**

All students are entitled to teachers who know the subject matter they are teaching. Permitting individuals who have not yet passed state licensing tests to teach neglects the needs of students, instead extending personal consideration to adults who may not be able to meet minimal state standards. Licensing tests are an important minimum benchmark in the profession, and states that allow teachers to postpone passing these tests are abandoning one of the basic responsibilities of licensure.

Pennsylvania should ensure that all teachers pass all required subject-matter licensure tests before they enter the classroom so that students will not be at risk of having teachers who lack sufficient or appropriate contentarea knowledge. The state allows individuals who have not met Pennsylvania's minimum standards for licensure to teach on emergency permits, which may be issued up to an additional two years to enable the individual

Licensure loopholes are a critical attention area in

states.

States on the right track include Mississippi, Nevada and New Jersey.

to complete and pass all testing requirements for full state certification. If conditional or provisional licenses are deemed necessary, then Pennsylvania should only issue them under limited and exceptional circumstances and for no longer than a period of one year.

#### **ENSURE THAT ELEMENTARY** CONTENT TESTS ADEQUATELY **ASSESS CONTENT KNOWLEDGE IN EACH SUBJECT AREA:**

Although Pennsylvania requires that all new elementary teachers must pass a Praxis II general subject-matter test, this assessment does not report teacher performance in each subject area, meaning that it is possible

to pass the test and still fail some subject areas. The state should require separate passing scores for each area because without them it is impossible to measure knowledge of individual subjects, especially given the state's current low passing score for the elementary con-

**Elementary licensure** tests are a critical attention area in

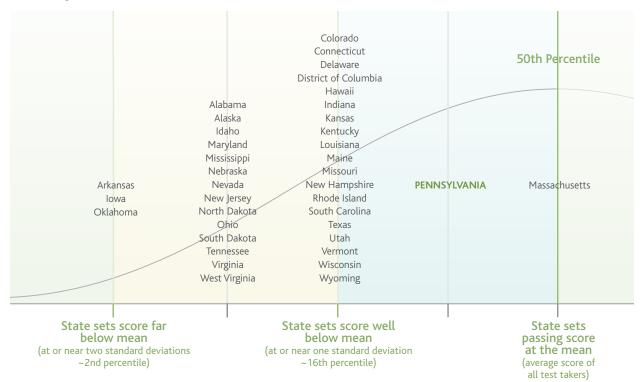
states.

A state on the right track is Massachusetts.

tent test. According to published test data, Pennsylvania has set its passing score for this test below the mean, the average score of all test takers, so it is questionable whether this assessment is indeed providing any assurance of content knowledge.



Figure 3
Where do states set the passing score on elementary content licensure tests?<sup>1</sup>



<sup>1</sup> Data not available for Arizona, California, Florida, Georgia, Illinois, Michigan, Minnesota, New Mexico, New York, North Carolina, Oregon, and Washington. Montana does not require a content test. Colorado cut score is for Praxis II, not PLACE.



## Critical Attention: Pennsylvania policies that limit the teacher pipeline

# PROVIDE FLEXIBILITY TO ALTERNATE ROUTE TEACHERS IN DEMONSTRATING CONTENT KNOWLEDGE:

Alternative certification can create a new pipeline of potential teachers for those with valuable knowledge and skills who did not prepare to teach as undergraduates. While it is critical that all teachers know the

Alternate route admissions is a critical attention area in

38 states.

States on the right track include Michigan and Oklahoma.

content they will teach, requiring alternate route teachers to have a major in their subject area rules out talented individuals with deep knowledge that may have been gained through related study or work experience. Such candidates will likely be disinclined to fulfill the requirements

of a new degree and should be permitted to demonstrate their content knowledge by passing a rigorous test. Pennsylvania currently does not provide a test-out option for its alternate route teacher candidates, instead requiring that they have a degree in the subject they plan to teach and pass a content-area test. The state should permit candidates to demonstrate their subject-matter knowledge through the content test without also requiring a major or equivalent coursework.

## BROADEN ALTERNATE ROUTE PROVIDERS:

Pennsylvania should encourage a diversity of providers of its alternate route, allowing school districts and nonprofit organizations, in addition to institutions of higher education, to operate programs. At present, with the exception of the American Board for Certification

of Teacher Excellence (ABCTE) program, the state only allows institutions of higher education to provide alternative certification programs.

Alternate route diversity is a critical attention area in

28 states.

States on the right track include Illinois, New York and Washington.



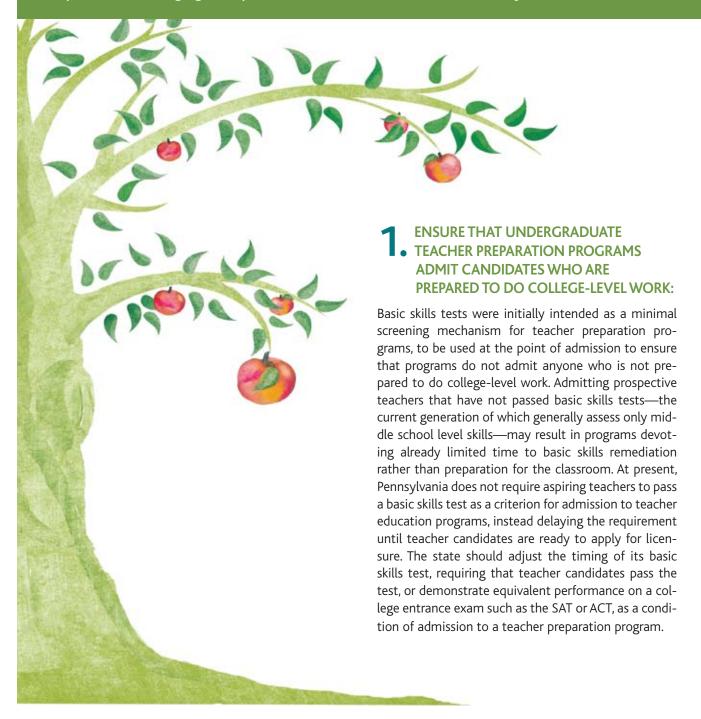
<sup>1</sup> Alaska's alternate route is operated by the state department of education.

<sup>2</sup> ABCTE is also an approved provider.

<sup>3</sup> North Dakota does not have an alternate route to certification.

## Section 2: Low-Hanging Fruit

This section highlights areas where a small adjustment would result in significantly stronger policy. Unlike the more complex topics identified in Section 1, the issues listed in this section represent low-hanging fruit, policies that can be addressed in relatively short order.



# 2. ENSURE THAT SPECIAL EDUCATION TEACHERS ARE ADEQUATELY PREPARED TO TEACH SUBJECT MATTER:

To allow special education students the opportunity to reach their academic potential, special education teachers should be well trained in subject matter. As a first step toward ensuring requisite content knowledge, Pennsylvania should require that elementary special education candidates pass the same Praxis II subjectarea test as other elementary teachers. The state's new special education policy will require all special education teacher candidates to earn a dual certificate, beginning January 1, 2013. However, in addition to either an early childhood (PK-4) or elementary/middle (4-8) certificate, Pennsylvania also allows candidates to satisfy the dual certification requirement with a reading specialist certificate. Candidates who choose this latter option will not be required to pass an appropriate content test. Therefore, the state cannot guarantee that all elementary special education teachers will have the requisite subject matter knowledge.

## **3.** EVALUATE NEW TEACHERS EARLY IN THE YEAR:

Although Pennsylvania commendably requires multiple evaluations for new teachers, the state should explicitly require that the first of these evaluations be conducted during the first half of the school year. This will allow new teachers to receive immediate feedback, as well as get the support they need sooner rather than later, especially for those that may be struggling. A plan for improvement can then be implemented, rather than potentially allowing an ineffective new teacher to remain in the classroom without any evaluation or support until late in the year.

## 4. ENSURE THAT STRUGGLING TEACHERS RECEIVE SUPPORT:

Pennsylvania should adopt a policy whereby all teachers that receive a single unsatisfactory evaluation are placed on a structured improvement plan, regardless of whether or not they have tenure. These plans should focus on performance areas that directly connect to student learning and should list noted deficiencies, define specific action steps necessary to address these deficiencies and describe how and when progress will be measured. Consequences for continued poor performance should also be articulated.

## 5. REPORT SCHOOL-LEVEL DATA TO SUPPORT THE EQUITABLE DISTRIBUTION OF TEACHERS:

In 2004, Pennsylvania reported the percentage of highly qualified teachers and the percentage of teachers on emergency credentials at each school. No additional data have been published since that time. While the state should consider making additional data available to the public to promote the equitable distribution of teacher talent among schools, at the very least it should ensure that the information provided is kept up-to-date.

## **Section 3: Systemic Issues**

This section discusses some of the longer-term systemic issues related to teacher quality that states also need to address. While these may not be "front-burner" issues in many states, they are important to an overall reform agenda.

## 1. Performance Management

The critical relationship between teacher quality and student achievement has been well established, and ensuring that all students have teachers with the knowledge and skills to support their academic success has become a national priority. Yet the policy framework that governs the teaching profession in most states is almost entirely disconnected from teacher effectiveness. Although states largely control how teachers are evaluated, licensed and compensated, teacher effectiveness in terms of student learning has not been a central component in these policies.

Fortunately, this is starting to change. Fifteen states have made progress in their requirements for teacher evaluation in the last year alone. As evaluation ratings become more meaningful, states should plan to connect teacher evaluation to an overall system of performance management. The current siloed approach, with virtually no connection between meaningful evidence of teacher performance and the awarding of tenure and professional licensure, needs a fundamental overhaul. These elements must not be thought of as isolated and

discrete, but as part of a comprehensive performance system. This system should also include compensation strategies as well as new teacher support and ongoing professional development, creating a coordinated and aligned set of teacher policies.

Meaningful evaluation is at the center of a performance management system, and, as discussed in the Critical Attention section of this report, Pennsylvania has considerable work to do to ensure that evaluations measure teacher effectiveness. But as the state moves forward, it should keep in mind the larger goal of creating a performance management system.

A successful performance management system—one that gives educators the tools they need to be effective, supports their development, rewards their accomplishments and holds them accountable for results—is essential to the fundamental goal of all education reform: eliminating achievement gaps and ensuring that all students achieve to their highest potential.

<sup>1</sup> Includes changes to state policies regulating the frequency of evaluations for probationary and nonprobationary teachers as well as requirements that teacher evaluations consider classroom effectiveness.

### 2. Pension Reform

State pension systems are in need of a fundamental overhaul. In an era when retirement benefits have been shrinking across industries and professions, teachers' generous pensions remain fixed. In fact, nearly all states, including Pennsylvania, continue to provide teachers with a defined benefit pension system, an expensive and inflexible model that neither reflects the realities of the modern workforce nor provides equitable benefits to all teachers.

The current model greatly disadvantages teachers who move from one state to another, career switchers who enter teaching and those who teach for fewer than 20 years. For these reasons alone, reform is needed.

\$650,011

Amount Pennsylvania pays for each teacher that retires at an early age with unreduced benefits until that teacher reaches age 65<sup>4</sup> But the dubious financial health of states' pension systems makes this an area in need of urgent attention. Some systems carry high levels of unfunded liabilities, with no strategy to pay these liabilities down in a reasonable period, as

defined by standard accounting practices. According to Pennsylvania's 2008 actuarial report, its system was only 86 percent funded, and that was before the recent market downturn. When funding cannot keep up with promised benefits, a new approach is clearly needed. And changes must be made immediately to alter the long-term outlook for the state, as it is exceedingly difficult to reduce promised benefits once a teacher is a member of the system—regardless of whether the state can afford them.

Systemic reform should lead to the development of a financially sustainable, equitable pension system that includes the following:

■ The option of a fully portable pension system as teachers' primary pension plan, either through a defined contribution plan or a defined benefit plan that is formatted similar to a cash balance plan²

- Reasonable district and teacher contribution rates
- Vesting for teachers no later than the third year of employment
- Purchase of time in a defined benefit plan for unlimited previous teaching experience at the time of employment, as well as for all official leaves of absence, such as maternity and paternity leave
- The option in a defined benefit plan of a lump-sum rollover to a personal retirement account upon employment termination, which includes teacher contributions and all accrued interest at a fair interest rate
- Funds contributed by the employer included in withdrawals due to employment termination
- A neutral formula for determining pension benefits, regardless of years worked (eliminating any multiplier that increases with years of service or longevity bonuses)<sup>3</sup>
- Eligibility for retirement benefits based solely on age, not years of service, in order to avoid disincentives for effective teachers to continue working until conventional retirement age.

- Public Fund Survey, http://www.publicfundsurvey.org/www/publicfundsurvey/ actuarialfundinglevels.asp.
- 2 A cash balance pension plan is a benefit plan in which participants, and their employers if they choose, periodically contribute a predetermined rate to employees' individual pension accounts. These contributions grow at a guaranteed rate. Upon retirement or withdrawal, the participant may receive the full account balance in one lump sum, so long as the benefits are fully vested. (Based on Economic Research Institute, http://www.eridlc.com/resources/index.cfm?fuseaction=resource.glossary)
- 3 The formula may include years of service (i.e., years of service x final average salary x benefit multiplier), but other aspects of the benefit calculation, such as the multiplier, should not be dependent on years of service.
- 4 Calculations are based on a teacher who starts teaching at age 22, earns a starting salary of \$35,000 that increases 3 percent per year, and retires at the age when he or she is first eligible for unreduced benefits. Calculations use the state's benefit formula for new hires, exclude cost of living increases, and base the final average salary on the highest three years. Age 65 is the youngest eligibility age for unreduced Social Security benefits.

## 3. Certification of Special Education Teachers

States' requirements for the preparation of special education teachers are one of the most neglected and dysfunctional areas of teacher policy. The low expectations for what special education teachers should know stand in stark contradiction to state and federal expectations that special education students should meet the same high standards as other students.

Pennsylvania, like most states, sets a low bar for the content knowledge that special education teachers must have. The state does not require that all elementary special education teachers take appropriate subject-matter coursework or demonstrate content knowledge on a subject-matter test, although beginning in 2013, all elementary special education teachers must earn dual certification. However, in addition to early childhood and elementary/middle certifications, Pennsylvania will also allow candidates to satisfy this requirement with a reading specialist certificate. Although the former options would require candidates to have passed content tests, the reading specialist certificate has no such requirement.

Further, although secondary special education teachers must be highly qualified in every subject they will teach, the state does not require that teacher preparation programs graduate teachers who are highly qualified in any core academic areas. The state's new dual certification policy would only guarantee that candidates who are also certified in a secondary content area are highly qualified in one core academic area. Those who choose the reading specialist certificate, which the state also allows for secondary special education teachers, will not be highly qualified in any academic subject.

Pennsylvania is commended for its new policy that will distinguish between elementary and secondary special education licenses and no longer allow its generic K-12 special education license. But its certification process still does not ensure that all special education teachers know all the subject matter they are expected to teach.



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<sup>1</sup> New policy goes into effect January 1, 2013.

