



Pennsylvania Association for the  
Education of Young Children



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Independent Regulatory  
Review Commission

Independent Regulatory Review  
Commission Commissioners  
333 Market Street, 14th Floor  
Harrisburg, Pennsylvania 17101

**EMBARGOED MATERIAL**

Dear Commissioners:

The Pennsylvania Association for the Education of Young Children (PennAEYC) is a statewide, non-profit membership organization of over 3,000 early childhood care and education professionals. As the Pennsylvania affiliate of the National AEYC, we strive to be an effective voice for high-quality early childhood care and education through policy development, advocacy and professional development and supports for early childhood professionals. On behalf of PennAEYC, I would like to thank you for the opportunity to offer comment on the State Board of Education's (Board) Academic Standards and Assessment final-form rulemaking (Regulation # 6-354).

We support the final-form rulemaking on the new strand for Education and Early Childhood Development within the Family and Consumer Sciences (FCS) standards. We are pleased to see that the FCS standards aim to prepare students for personal, family and work responsibilities and empower students for the challenges of living and working in a diverse, global society. We understand and support that this addition of the strand will support the instruction aligned to Pennsylvania's new Career and Technical Education Program of Study in Education. We are also pleased to see the substrands for Education and Early Childhood Development: developmental stages, learning environments, health and safety, literacy, collaborative relationships and careers.

We are pleased to see that in the final-form rulemaking the Board added K-2 standards to the strands for Personal Interests and Career Planning and Career Awareness and Exploration to support introductory career awareness activities for K-2 students. We thank the Board for agreeing with our suggestion. We thank and agree with the Board for including another elementary-level standard focused on entrepreneurial endeavors within the Career Education and Work standards. PennAEYC is also pleased to see that the Board agreed with the suggestion to reference child development in the final-form rulemaking and added it to sections §4.23 (c)(9) at the high school level and §4.22(c)(11) at the middle level.

We fully support the Board drawing from the Pennsylvania Learning Standards for Early Childhood to add a 3-5 grade band standard to the substrand Collaborative Relationships. PennAEYC strongly agrees that aligning grade band standards ensures the educational continuum is represented in the series of academic standards and provides clarity to what children should know and be able to do at specified levels, beginning at infancy for purposes of curriculum development and teacher instruction. PennAEYC understands that the Board disagreed with the suggestion to include a K-2 grade band standard in the substrand for Health and Safety due to the needed comprehensive review of Appendix D of Chapter 4 since there are no standards at the K-2 grade band currently. However, we encourage the Board to consider this suggestion when a comprehensive review of Appendix D occurs.

This final-form rulemaking will prepare learners in the exploration of and finding careers obtaining employment and training. Our hope is that with these additions learners will choose early childhood education as a career given the skills that are a part of the standards for FCS. We also note that educator preparation programs will need to integrate instruction in the updated standards into the coursework they deliver to those becoming teachers. As you know, the early childhood workforce is struggling and has been in a crisis in recent years due to the low compensation in the sector. In addition to recruitment and retention initiatives, it is important to grow the workforce that holds the necessary credentials and meets the standards and guidelines.

Thank you again for the opportunity to provide public comment. Please contact our Senior Director of Public Policy and Advocacy, Kimberly Early, at [kearly@pennaeyc.org](mailto:kearly@pennaeyc.org) should you have any questions.

Sincerely,



Jen DeBell  
Executive Director  
Pennsylvania Association for the Education of Young Children