

Senator Rafferty, Representative Murphy, and Distinguished Members of the Education and Cultural Affairs Committee:

Thank you for the opportunity to provide testimony regarding the proposed changes to Chapter 115 and the expansion of the 282 Special Education certification to cover pre-K through grade 12.

My name is Heather Marden on behalf of Maine Association for the Education of Young Children and Family Child Care Association of Maine, I offer these comments neither in support of nor in opposition to the rule changes overall, but to respectfully request reconsideration of the provision expanding the 282 certification to encompass the full pre-K–12 span.

While alignment and flexibility in certification pathways are important goals, the proposed breadth of this credential raises significant concerns related to developmental specialization, instructional practice, and the complexity of meeting the needs of learners across vastly different stages of growth.

Developmental Differences Across Age Spans

The developmental differences between a 4-year-old child in a pre-K setting and a 16-year-old student in high school are profound. These differences are not simply matters of curriculum content; they are rooted in distinct stages of cognitive, neurological, language, motor, and social-emotional development.

Research in early childhood development consistently demonstrates that early learning (birth through age 8) represents a uniquely sensitive and foundational period of brain development. According to the Center on the Developing Child at Harvard University, more than one million new neural connections are formed every second in the earliest years of life. Instructional approaches during this period must be grounded in play-based learning, relationship-based practices, family engagement, and embedded intervention within natural environments.

By contrast, adolescents in middle and high school are navigating puberty, executive functioning maturation, identity development, and increasing academic abstraction. Specialized instruction at these grade levels often focuses on content-area modifications, transition planning, vocational preparation, and credit-bearing coursework aligned with graduation requirements. The Individuals with Disabilities Education Act (IDEA) requires formal transition planning beginning no later than age 16, shifting the focus of special education services toward postsecondary outcomes, employment, and independent living.

Special education practice in early childhood differs significantly from practice in later grades in several key areas:

Service Delivery Model

In pre-K, services are frequently embedded in play routines and delivered in inclusive early

learning environments with heavy collaboration with families and related service providers. In middle and high school, services often include co-teaching in content-specific classes, credit recovery, and structured interventions tied to academic standards.

Assessment and Identification

Early childhood special education relies heavily on developmental screening tools, observation-based assessment, and family input to identify delays across domains such as communication, adaptive functioning, and motor skills. In adolescence, identification may be more focused on specific learning disabilities, emotional disturbance, or content-area deficits measured through standardized academic tools.

Instructional Methodology

Pre-K instruction must be developmentally appropriate, experiential, and relationship-based. Middle and high school instruction often requires deep knowledge of subject-specific curriculum, accommodations for standardized testing, and alignment with graduation pathways.

Family Partnership

While family engagement is essential at all ages, early childhood special education places an especially strong emphasis on coaching families and supporting development within home and community contexts.

These are not minor variations in practice; they reflect distinct bodies of knowledge and pedagogical preparation.

Expanding a single certification (282) to cover pre-K through grade 12 risks diluting the depth of preparation in either early childhood or adolescent specialization. The field of education has long recognized the importance of developmentally aligned credentials—elementary versus secondary licensure, for example—because teaching methods and content expertise must match learners’ developmental stages.

The National Association for the Education of Young Children (NAEYC) and other professional organizations have emphasized that early childhood educators require specific competencies in child development, early literacy and numeracy foundations, trauma-informed care for young children, and play-based assessment practices. These competencies are not interchangeable with the skills required to modify Algebra II instruction or design transition services for a 17-year-old preparing for employment.

Additionally, research shows that early identification and high-quality early intervention significantly improve long-term outcomes for children with disabilities. Ensuring that educators serving pre-K students have deep expertise in early childhood development is directly tied to later academic and social success.

Conversely, adolescents with disabilities face different risks—dropout, disengagement, and limited postsecondary access—that require specialized knowledge in transition planning, vocational assessment, and adolescent mental health.

Recommendation for Consideration

Given these realities, I respectfully request that the Committee consider whether maintaining more developmentally aligned certification bands would better support children and educators. Options could include:

- Maintaining a distinct early childhood special education credential (e.g., birth–grade);
- Creating clear developmental sub-endorsements within the 282 certification that would be required to teach pre-K through 3rd grade with specific early childhood development professional development requirements.

The goal of certification policy should be to ensure that educators are deeply prepared—not broadly credentialed without sufficient specialization.

This testimony is offered in the spirit of strengthening Maine’s special education system and ensuring that children at every developmental stage receive instruction grounded in research-based practice tailored to their needs.

Thank you for your thoughtful consideration and for your commitment to Maine students and families.

Change definition Below:

26. Pre-K (pre-Kindergarten) shall mean a program offered by a public school that provides instruction for children who are four years of age by October 15th and for all three year old children eligible for special education

To

26. Pre-K (pre-Kindergarten) shall mean a program offered by a public school or **early childhood public pre-K partner program** that provides instruction for children who are four years of age by October 15th and for all three year old children eligible for special education.