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December 18, 2009

Commissioner David M. Steiner  
New York State Education Department  
Room 111 Education Building  
89 Washington Avenue  
Albany, NY 12234

Dear Commissioner Steiner:

We write to express our comments on the November 10, 2009 proposal endorsed by the Board of Regents that has as its goal to transform teaching and ensure an equitable distribution of qualified teachers in New York State.

This proposal has significant implications for our college and university teacher preparation programs that are represented by NYSUT's local affiliates, the Professional Staff Congress (PSC) at the City University of New York and the United University Professions (UUP) at the State University of New York, as well as a number of private colleges and universities.

We agree with the State Education Department (SED) that it is essential "teachers are prepared to the highest standards and enter the classroom with a knowledge base and skill set grounded in research-based practice and clinical experience" in order to have a long-term effect on student achievement. We are also committed to examining teacher preparation to identify best practices that are closing the achievement gap, replicate successes, and provide support for thoughtfully considered innovations that demonstrate improved student performance.

We must point out that most of the schools of education in New York State have a proven track record of success in the preparation of teachers. All are nationally accredited and undergo rigorous review procedures. We encourage the State Education Department to learn from the best practices of these schools so that they can be replicated in all teacher preparation programs. In addition, the latest changes in teaching policy implemented by the Board of Regents to strengthen teacher preparation have been reflected only in certificates issued since September 1, 2004. We have not seen any data or research to indicate that those changes have been ineffective in intent or implementation.

The proposal would have been strengthened by involving faculty in these discussions. While there are areas of agreement, there are also many questions and areas of strong disagreement, which are shared below.

The call for a performance-based assessment of teachers suggests that the current assessment system results in poorly prepared teachers. However, the New York City Department of Education reports statistically significant gains by New York City public school students on the 2009 National Assessment of Educational Progress (NAEP) math exam for fourth and eighth grades. In 2009, SED reported the highest number of New York State students achieving mastery on Advanced Placement examinations. While we recognize that gaps in academic performance must be addressed, we question that the precise remedy is the introduction of performance-based assessments for teachers. Given New York State's diminished fiscal support for institutions of higher education, the introduction of such a testing regimen does not address important questions such as funding, assessment development and adequate resources for effective implementation. An unfunded initiative such as this will become an additional cost burden to both the institution and the student. The creation of a new assessment through a private vendor would impose another measurement tool on the teacher preparation process that duplicates—and ultimately diminishes—the current assessment of teacher-candidates through multiple measures as required by national institutional accreditation. We recommend using our current national accreditation process to strengthen this aspect of our current assessment system. We suggest a review of a sampling of the current assessments, such as portfolios, obtained from teacher-candidates can be conducted by other accredited institutions in the State in order to develop inter-rater reliability and a common system of review. Additionally, the proposal calls for more rigorous Content Specialty Tests with subtests for certain certificate areas in literacy/English language arts and mathematics. More difficult tests would suggest the need for additional coursework to provide appropriate curriculum preparation. Currently, certification requirements have resulted in a curriculum that is often difficult to complete in four years.

The current proposal may actually result in limiting the pool of potential teachers. In addition, the proposed value-added assessment for professional certification based upon student learning may very well deter teachers from urban teaching assignments, particularly in high need schools where low test scores are likely.

Establishing profiles of certifying institutions through the development of a P-16 data system has the potential to be a helpful tool for improving teacher preparation programs if data can be made readily available to institutions in a form useful in improving their programs. An example of useful data reporting can be found in student performance information on the New York State Teacher Certification Examination program which, in turn, assists teacher education programs in strengthening admission policies. Ultimately, the stronger admission policies have led to higher passing rates on the same examinations. The addition of data elements such as retention rates of graduates in teaching positions, the performance of K-12 students taught by graduates, and the employment of an institution's graduates in high need schools in New York State cannot result in a valid measurement of institutional performance because the many variables affecting these elements are not controlled by the institution. In addition, attributing all graduates to the certifying institution does not adequately consider the complexities of student variables, such as pre-admission preparation in secondary or post-secondary settings, the impact on data of transfer students, or the tracking of students both in-state and out-of-state, after graduation.

We have a significant concern that a data profile, composed of misapplied measures, will become punitive and form the basis for inappropriate institutional sanctions. It is reasonable to expect significant costs in the development, implementation and collection of such a data profile, but the proposal under consideration includes no discussion of funding. Once again, we fear that this initiative will become an additional cost burden to both the institution and the student.

We support innovation and the call to **pilot a new teacher certification model**, but we must also note that certification through accredited colleges and universities has strengthened the professional standing of teachers and established clear, consistent and rigorous preparation standards. The value of being educated as a teacher within a college setting, where students are exposed to a rich array of intellectual challenges outside of the teaching curriculum, should not be underestimated. The unspoken implication of many alternative models of preparation is that anyone can teach. Other professions, when faced with shortages in specialized areas, do not typically move to create what can be perceived to be an easier path to the profession. Piloting different models of teacher preparation should occur within the context of a college-based teacher preparation model and not as an alternative to it. We would suggest that SED critically review the lessons learned from previous models of alternative certification. It is commonly reported that the retention rate of individuals who enter the teaching profession through a Transitional B certificate has not been a positive indicator of success. It is unclear why teacher preparation obtained solely through other entities such as non-collegiate institutions, as proposed, would result in better trained teachers who remain in the profession. We are unaware of research that would support such a change in pedagogical preparation. An alternative path to teaching using a rigorous, clinically-based certification model certainly warrants discussion, and we would support the partnership of institutions of higher education with cultural institutions, research centers, and others in order to enhance the current teacher preparation model and target potential teachers who are not currently serviced by the existing models.

Allowing secondary-level certification candidates to **demonstrate content knowledge** through course credits that can be obtained through evaluation or experiential equivalence is already permissible in institutions of higher education. Accredited courses of study that have been peer-reviewed offer clear, consistent and rigorous preparation standards. The value of such curricula cannot be understated. These courses of study already have procedures in place to assess the appropriateness of experience and transfer credits. Once again, we are unaware of data or research that suggests that coursework is a barrier to the certification of secondary teachers. In fact, this recommendation appears to contradict the ability of an institution and the responsibility of its faculty to determine adequate preparation and ensure accountability in the award of an academic degree. It would be unwise for the Regents to mandate course equivalencies. Our concern for this recommendation is heightened by the proposal to allow preparation programs provided by non-collegiate providers to apply such flexibility in determining a teacher-candidate's content knowledge. We remind the Regents that their commitment to "Teaching to Higher Standards" in 1998 called for the elimination of the transcript evaluation pathway to certification because of their desire to ensure that teachers have "a demonstrated record of academic preparation that is unequalled in the nation." Likewise, for a variety of reasons, we oppose the Board of Regents directly granting master's degrees. In

addition to questioning the appropriateness of the Regents' conferring degrees on students, we also note the lack of SED resources to create and implement such a program, particularly as SED does not have the resources to administer the Regents Accreditation of Teacher Education (RATE) program.

As educators, we also are committed to expanding the recruitment and retention of teachers in STEM (science, technology, engineering, and mathematics) disciplines in high need schools. We would suggest expanding this recruitment and retention effort to include teachers of students with disabilities and English language learners. SED's recommendation appears to diminish the importance of pedagogical knowledge and mastery in order to attract individuals with content area knowledge. We would argue that there is a critical balance to be achieved in addressing this issue and would challenge an initiative that places individuals in high need schools with little, if any, pedagogical training. Such an initiative ignores the issues outside of teacher preparation and certification that dissuade our most effective teachers from working in such settings.

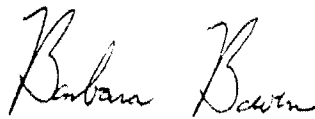
Improving teacher effectiveness must go beyond a singular focus on teacher preparation and must consider the significant impact of internships, mentoring, and teaching peers on excellence in teaching. The climate and culture of successful schools and their relevance to effective teaching must also be part of this policy discussion. We call on the Regents to meet with teacher preparation faculty and representatives of PSC and UUP to discuss the role of teacher preparation programs in support of our shared goal of teacher effectiveness and student achievement.

We look forward to continuing this important and timely conversation on behalf of all students and future teachers in New York State.

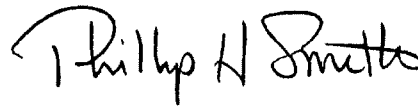
Sincerely,



Maria Neira  
Vice President  
NYSUT



Barbara Bowen  
President  
PSC



Phillip Smith  
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MN/DR - cmc - CWA 1141

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CC: Chancellor Tisch  
Members of the Board of Regents

12/18/09