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July 10, 2018

MaryEllen Elia  
Commissioner of Education  
New York State Education Department  
89 Washington Avenue  
Albany, NY 12234

Dear Commissioner Elia,

In a Regents item introduced this May the Committee for Clinical Practice gave an overview of its activities and recommendations for field experience and student teaching requirements. As the Department considers making regulatory changes that could greatly impact the field of teacher preparation in NY we respectfully ask that you first consider this input.

We applaud the Committee's efforts to make teacher preparation more clinically rich and to ensure that teacher candidates get the experiences needed to become well prepared to teach in NYS classrooms. We also support developing stronger partnerships that foster more collaboration between educators in K-12 and higher education and help to build stronger bridges between them.

While the field experience and student teaching requirements in Section 52.51 of the Commissioner's regulations have been in effect since January 2000, there have been many significant reforms enacted since including a requirement for national accreditation, an additional 3 credit course and the new and revised certification exams.

With any large scale reform it is important to thoughtfully examine feasibility issues and to ensure effective implementation aimed at limiting unintended consequences. Before making any additional changes to the requirements for teacher education programs we strongly urge the Department to conduct a feasibility study. A systematic examination is critical and could shed light on how these new reforms would look *on the ground* including logistics, costs and other capacity issues. Using a balanced sampling of campuses representing bachelors and masters level programs, all sectors and geographic locales, a feasibility study could help to determine how some of the new regulations might improve or hinder current practice in teacher preparation.

These recommendations come to the field at a very challenging time. Against a backdrop of impending teacher shortages in some areas, enrollments in teacher preparation have been in decline since 2009. While the last reported year has shown a slight improvement in enrollment the downward trend has been concerning. Coupled with this, current Title II data show that there have been fewer applications

for teaching certificates. Since 2013, the number of exam test takers in NY has fallen from 13,050 to only 9,333. While the draft recommendations do have some merit, at the same time they pose serious concerns which could exacerbate these declines or lead to negative consequences for teacher educators and their candidates.

Increasing the required number of field experience hours from 100 to 150, prior to student teaching, may present unnecessary, significant obstacles for hundreds of programs across the state and for teacher candidates who already struggle with the increasing costs in obtaining certification. There is no concrete evidence that the current 100-hour requirement is not working optimally in the context of many of these programs. New York has around 133 higher Ed institutions offering over 1,900 different programs to prepare teachers for more than 23 different licensure areas. Each campus or college department has unique contextual factors that determine program specific needs for field placements, supervision and other logistical challenges. Many institutions offer degrees that lead to dual certifications. Our teacher preparation programs are offered at both the bachelors and masters levels and may be located in large urban areas, suburban and rural districts. Some can employ full time campus based faculty or local adjuncts to deliver a program while rural campuses and others may have remote operations and placements due to limited resources and/or geographic proximity to school communities.

Increasing the number of field experience hours is an excellent aspirational goal and may help to strengthen some teacher preparation programs while presenting serious obstacles for others. Instead, requiring a flexible range of required hours (e.g., 100-200) would help to preserve program autonomy and might be more in keeping with the varied needs of programs with differing locations and specializations.

In addition, a systematic assessment of the impact of a regulatory change that would mandate additional hours is needed to identify likely implementation issues and needs. More required field experience hours will likely increase the number of faculty needed to supervise those hours and in turn, could increase costs to colleges and transportation costs to their teacher candidates, many of whom are confined to shoe string budgets. Logistically speaking, in a four year program added hours might have to be embedded into coursework beginning as early as sophomore year in order to ensure on time graduation. For students on the Excelsior scholarship program and others with financial limitations this is especially important. Increasing the required number of field experience hours could also put transfer students, or those who change majors, at a disadvantage and limit opportunities for teacher candidates who wish to study abroad.

Another recommendation would require university-based teacher educators to have at least three years of teaching or related experience “in the past five years.” This proposal assumes that the expertise of long term veteran teachers, or anyone who has taken a break from the profession, has somehow “expired” and is no longer valid. This assumption is not grounded in research or best practices for the profession. In fact, veteran educators bring experience that more recent program completers may not. In addition, this requirement, if enacted, would significantly limit the pool of available personnel qualified to do field supervision, imposing an undue burden on many educator preparation programs that already face challenges finding adequate staffing for field supervision. Many programs send student teachers to school districts far from their campuses and rely on a workforce of retired teachers and adjuncts who live in those districts to supervise them.

We support regular professional development for university based teacher educators. In fact these educators are already involved in professional development activities on an ongoing basis. Before a

new mandate for professional development is put in place, it is important to look at the activity that is already occurring to determine if a new requirement is in fact needed. It will also be important to take into consideration the funding and specific content of any new requirement.

For many years SUNY and CUNY campuses have been severely underfunded and many are suffering from an acute lack of resources. Teacher preparation programs are among those who have been affected by the state's diminishing funds and increased financial burdens while having to support several mandates since the controversial Race to the Top reforms were rolled out. Additional unfunded mandates could prevent some colleges from being able to continue delivering high quality programs.

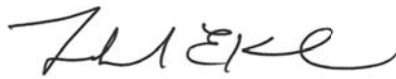
Finally there seems to be a disconnect between current NYSED policies which are making it more difficult for some traditional teacher preparation providers to maintain fiscal health and stability while relaxing rules for other pathways to certification. A more comprehensive approach to regulatory reform might help to avoid the pitfalls likely to occur in this inconsistent piecemeal approach.

NYSUT, UUP and PSC are all committed to maintaining high quality teacher preparation for the many unique programs encompassed across the state. We ask that you take a comprehensive approach to reforming the requirements for teacher preparation providers by carefully assessing the nuances of individual programs and the potential benefits and barriers that may exist before new requirements are enacted.

Sincerely,



Andrew Pallotta  
President  
New York State United Teachers



Frederick E. Kowal  
President  
United University Professions



Barbara Bowen  
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C: Members of the New York State Board of Regents