



**Stony Brook
University**

MICHAEL A. BERNSTEIN
Professor of Business, Economics, & History
Provost & Senior VP for Academic Affairs

OFFICE OF THE PROVOST
407 Administration Building
Stony Brook, NY 11794-1401
P 631.632.4360
F 631.632.7112
E michael.bernstein@stonybrook.edu
stonybrook.edu/provost



August 16, 2017

Mr. Ralph A. Rossi, II
SUNY Charter Schools Institute
41 State Street, Suite 700
Albany, NY 12207

Dear Mr. Rossi:

I am writing on behalf of Stony Brook University, State University of New York to submit our formal comments on the draft regulations SUN-30-17-00024-P which relate to teacher certification qualifications in certain charter schools. We strongly oppose these draft regulations, as they would open a door to unqualified teachers for the state's children in SUNY charter schools. Stony Brook supports high standards in education, particularly for those who would teach P-12 students many of whom may one day be students in the SUNY system.

Since its inception in the mid-twentieth century, Stony Brook University has been committed to providing the highest quality education for P-12 teachers, especially those in science and mathematics. Our teacher certification programs in all content areas have been nationally recognized by their professional associations and by the National Council for the Accreditation of Teacher Education since 2004. These ongoing accreditation reviews (the most recent in 2016) have ensured that Stony Brook University teacher education students receive rigorous, high-quality instruction in content and in pedagogy and that this higher education is aligned with a minimum of 100-hours of field experience opportunities in local P-12 schools supervised by NYS certified teachers, and then with 75-days of student teaching under the supervision of a tenured, NYS certified teacher. Even after graduating from our very successful programs, the students must then pass a host of state exams and attend a series of state workshops. This strenuous curriculum delivered by a distinguished team of tenure line content faculty and career-public school teachers ensures that all teachers certified through Stony Brook University are truly well prepared to educate the state's children. The recent adopted SUNY TeachNY policy encourages even greater rigor.

In contrast, the draft regulations SUN-30-17-00024-P would permit certain charter schools to hire someone to teach with only a bachelor's degree and as little as 30 hours of field experience. They would not be required to take additional coursework from an accredited college or university; they would not be required to be supervised by certified teachers and higher

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education faculty; they would not be required to student teach under the supervision of a certified teacher; and, they would not be required to pass rigorous state certification exams. They would also not be required to earn a master's degree. In fact, the teachers "certified" in this manner would bear virtually no resemblance to a NYS certified teacher. Calling them "certified teachers" would be a misnomer and an injustice to those who have put in the work to rightfully earn the designation and an injustice to those they would attempt to educate.

The SUNY Charter Schools Institute draft regulations SUN-30-17-00024-P are justified--according to the proposers--by the claim that some charter schools are having difficulty hiring certified teachers, as they are currently required to do. The answer this conundrum is not lowering standards for teachers; we believe lowering such standards would only harm charter school students and families. It would also create a cadre of underqualified and de-professionalized charter school teachers. The answer instead to this problem is to find innovative and effective ways of recruiting and retaining the highly-qualified teachers that institutions of higher education, such as Stony Brook University, already graduate.

Stony Brook University is committed to graduating excellent, rigorously prepared teachers. The state's children, their families and communities, and the state's taxpayers deserve nothing less. In the strongest terms, we recommend that draft regulations SUN-30-17-00024-P be rejected.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Bernstein". The signature is written in a cursive, slightly slanted style.

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