



## United University Professions

January 7, 2014

Assemblymember Deborah J. Glick  
Legislative Office Building, Room 717  
Albany, NY 12248

Dear Chairperson Glick:

On behalf of my 35,000 members, I wanted to thank you for convening the important December 12 hearing to discuss New York's Public University Systems' Use of State Aid and Revenue Generated by Tuition Increases. I also wanted to thank you and the members of the Assembly Higher Education Committee for your hard work and continued support for affordable, accessible, quality **public** higher education. You have provided great support in keeping SUNY's Downstate Medical Center a state-operated public hospital providing vital health care services to the underinsured and uninsured, and for this we are truly thankful.

At the hearing, the committee engaged the United University Professions (UUP) and the New York State United Teachers (NYSUT) in a thoughtful conversation on the State Education Department's (SED) new requirements for college teacher preparation programs. I wanted to follow-up with you and the committee about the effect that the edTPA (student teacher performance assessment) would have on students seeking their teaching certificate and also respond to the questions that were raised by the committee regarding the components of this assessment.

As I testified, the edTPA is a complex student teacher performance assessment that is being applied to education majors who will graduate in Spring 2014. The edTPA test has three components involving teacher planning, instruction, and assessment. Students are required to assemble a complex portfolio based on state-required student teaching stints in schools. Students are also required to videotape themselves while student teaching. Student teachers are likely to be assessed after only two to three weeks of their classroom placement. It is done early on so that the students are able to complete the work of the edTPA and submit it for scoring in time to get results upon completion of their Bachelor's Degrees. However, this means that students will not complete their training before they are assessed.

UUP is concerned that New York State has made this assessment a high-stakes certification requirement and is moving too quickly on its implementation. In fact, New York is one of only two states that have made this assessment a requirement for certification. Most other states are in an exploratory stage, introducing edTPA with more caution in order to integrate it more effectively, assess its validity and reliability, and address problems identified in pilots. Use of edTPA as a certification requirement is especially problematic because, unlike other states, New York requires four tasks instead of three for the edTPA in elementary education. The addition of the fourth task (the math assessment "sidecar" task) renders reliability studies that were done in the context of field trials that required only three tasks inapplicable. SED references these reliability studies as applicable to New York, which is methodologically unsound.

Further alarming is that due to SED's accelerated implementation timeline, the criteria for assessment were neither completely clarified nor made available in a timely fashion to the teacher education

programs in which the students have been enrolled. This means that teacher education programs had not been given the time or tools necessary to adequately prepare students for the edTPA. Despite these factors, SED is implementing the edTPA with an acknowledged failure rate that could be as high as 40 percent. Many students who have successfully completed their college degrees will be denied teacher certification because of poorly planned and implemented new requirements imposed by SED.

In addition to all of these concerns, is the fact that a for-profit corporation, Pearson Inc., is involved in a student teacher assessment that is *embedded in college curricula*. It designed and owns the edTPA delivery system and *will score and profit* from the edTPA. The students will pay \$300 for the edTPA (\$100 for each section of the test). They are required to pass each section and if they fail one part, they will have to retake it for certification and pay \$100 to repeat each section they fail.

UUP, along with NYSUT, believes that the implementation of this assessment should be slowed down, so that it can be implemented properly. As this assessment is pushed forward, on top of the strain that has been caused by the implementation of the "Common Core" standards, some programs are experiencing difficulty with student teaching placements. The end result is an enrollment decline in New York State's Teacher Preparation programs. Talented prospective teachers are hesitant to enter the field.

We are asking for support to delay the implementation of the edTPA so that SUNY students who have invested in their college education, worked hard, completed the teacher preparation program requirements successfully, and who have been assessed by experienced educators to be prepared to enter the teaching profession are not unfairly denied teaching certification at unacceptable rates. Together, UUP and NYSUT have developed recommendations to address these issues as related to the application and implementation of the edTPA. In short, we recommend the following changes:

1. Require the edTPA for program completion only and eliminate it as a requirement for teacher certification.
2. Extend the timeline for implementation of edTPA to June 2015 to allow teacher preparation programs to align their courses with the new assessments, integrate new content into programs as needed, and assess the validity and reliability of the edTPA in view of all tasks required by NYS.
3. Adjust data profiles so edTPA are not included until the 2015-16 academic year. Performance data from a student population that has not been educationally prepared for the edTPA should not be considered valid data.
4. Update state regulations for student teaching to align with the Regents Reform Agenda. The edTPA does not align with state regulations that require two separate seven week placements for student teachers.
5. Eliminate the complicated student teaching waiver application recently adopted by SED.

Please find enclosed a detailed description of UUP's recommendations, as well as a letter that Maria Neira, NYSUT, Vice President, recently sent to Commissioner King regarding NYSUT's recommendations on New York State's use of the edTPA.

In closing, I want to express my concern that this initiative, as well as other initiatives that I spoke about in my testimony, are being implemented with very limited faculty and student input and without real implementation plans. If these initiatives are not carefully implemented they have the potential to impede access, erode educational quality, and weaken academic standards. If you have any further questions on edTPA or any of the other issues, please do not hesitate to contact me. Again, thank you for the time and consideration that you and the committee gave to the issues that we raised at the hearing.

Sincerely,



Frederick Kowal, President  
United University Professions

cc: Members of the Assembly Committee on Higher Education