



December 7, 2017

Betty A. Rosa, Chancellor
Board of Regents
State Education Building
89 Washington Avenue
Albany, NY 12234

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

Dear Chancellor Rosa and Commissioner Elia:

In New York State Educator Preparation programs that prepare candidates for licensure are required to obtain national program accreditation. Prior to 2013 colleges of education were able to choose between The National Council for Accreditation of Teacher Education (NCATE) and the Teacher Education Accreditation Council (TEAC). Each organization offered a distinct approach to accreditation accommodating the wide variety of programs across the state. New York's educator preparation programs include many different certification areas, undergraduate and graduate level curricula, research based approaches and various college and university settings.

With the merger of NCATE and TEAC into one new organization known as The Council for the Accreditation of Educator Preparation (CAEP), many of our higher education colleagues were concerned about the loss of choice. But CAEP initially promised to maintain three distinct pathways to accreditation and this helped to alleviate some of the concerns.

For the past four years CAEP has worked to establish itself as a national accreditation leader for the field of education. Despite their effort CAEP continues to face substantial challenges in meeting that objective. To begin with CAEP struggles to maintain consistent communication with its subscribers. As a result many of our members complain that they do not receive clear guidance from CAEP or timely responses to important queries.

There has been national controversy about CAEP's standards since their release. Internally CAEP has been fraught by conflicts about the standards and the accreditation process. As a result, there has been significant staff turnover throughout the organization that has affected CAEP's ability to deliver on stakeholder expectations. Most recently, CAEP deviated from its stated commitment to the field to maximize choice by announcing its decision to "*drop the accreditation pathway choices*" previously offered. Instead CAEP has now moved to a single pathway- and the particulars of that pathway are yet unclear as are many of CAEP's still evolving policies and practices.

It is within this context that another accrediting agency for educator preparation has been formed. Led by a recognized national figure in accreditation, The Association for Advancing Quality in Educator Preparation (AAQEP) has quickly developed work groups with representation from 14 states including New York. AAQEP recently released draft frameworks for feedback and will publish its new standards early in 2018. Importantly, the establishment of AAQEP restores the practice of choice. If AAQEP is adopted by NYS as an alternative to CAEP it will allow our colleagues to choose the accreditor that best meets their needs.

There are many reasons for enabling educator preparation programs to choose between CAEP and AAQEP. To begin with, CAEP’s accreditation process is not optimal for many teacher preparation programs. Its approach is seen by many of our members as an impediment to the innovation called for in teacher preparation. CAEP standards are centered on a compliance model that is very top down. Its rigid requirements do not always take into account an institution’s unique contextual factors. For example, in a research based University program, an inquiry driven model requiring peer collaboration is more aligned with driving a process of institutional innovation.

In addition, some CAEP requirements are in conflict with best research practices. CAEP focuses excessively on measureable outcomes. While outcome measures are an important part of evaluation, CAEP is less attentive to process and innovation. CAEP encourages the use of VAM, or value added measurement. VAM has not been validated for use in evaluating teacher preparation programs. CAEP also requires data not available in some cases. More to the point NYS does not have a comprehensive database. Consequently K-12 and higher education institutions are often unable to readily share data on student test scores and other measures.

AAQEP is developing a system different from CAEP’s. The AAQEP process is being designed to focus on inquiry and reflective practice. It is based upon clear expectations, consistency, multiple sources of evidence, and transparency. Its frameworks reference encouragement for partnership, collaboration, innovation and peer review, as well as sensitivity to local contexts, institutional missions, and state priorities.

AAQEP is a new organization and it will need time to evolve. CAEP is no longer a new organization but it continues to evolve. It would be unfair to give one organization a monopoly over the accreditation process, and as we have pointed out, there is no compelling argument for doing so as CAEP has a number of significant flaws. CAEP has been adopted by many institutions. Those institutions can continue to use their services if they so choose. What we need are choices to promote best practices in accreditation process and outcome.

Program accreditation should be seen as an instrument for both accountability and program improvement. Increasingly educator preparation programs are expected to pioneer improvements in a constantly changing world. We strongly urge you to approve both accreditors for New York State and give our teacher educators the right to choose a best fit, CAEP or AAQEP for their institution.

Sincerely,



Andrew Pallotta
President
New York State United Teachers



Frederick E. Kowal
President
United University Professions



Barbara Bowen
President
Professional Staff Congress

C: Members of the New York State Board of Regents