



United University Professions

August 20, 2017

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

Dear Mr. Rossi:

On behalf of United University Professions, the nation's largest higher education union, I am submitting the following comments on draft regulations SUN-30-17-00024-P pertaining to teacher certification in SUNY charter schools. UUP represents 42,000 academic and professional faculty and retirees from SUNY state-operated campuses, including 16 campuses with teacher preparation programs that prepare future teachers and recommend candidates for teacher certification in New York State. UUP voices strong opposition to all aspects of the proposal for reasons outlined below.

It is neither educationally sound nor fair to subject charter school students to more unqualified teachers.

New York State regulations already allow charter schools to have a segment of their teachers remain uncertified. Adding more unqualified teachers to the charter school workforce is unacceptable in view of prevailing professional standards. Just as citizens of the state would not accept a lower tier of unqualified practitioners in fields such as law, medicine, engineering, social work, and other professions, neither should we accept the institutionalization of a lower tier in education. It's one thing to allow charter schools to evade required qualifications for a limited segment of their teaching workforce. It's an entirely different and more consequential matter to establish a new, so-called "certification" sub-tier that is sanctioned in state regulations. Any attempt to present the proposed charter school teacher preparation/certification proposal as one that creates a parallel or alternative certification pathway is disingenuous and ill-informed. What is proposed does not come close to approximating state or federal professional standards for teacher preparation or teacher certification.

It is in stark contrast to research-based understandings about conditions that support positive outcomes for diverse, high-needs students.

SUNY's charter school network serves more than 56,000 students. Nearly 80 percent of those students are economically disadvantaged, with students of color constituting the

majority at many charter schools. SUNY claims its proposal will help address the educational needs of students of color but, ironically, it will undermine the most important factor needed to support students of color: **retention of a qualified, diverse teaching force.**

National research is clear on the association between positive student outcomes and both teacher diversity and teacher retention. For example, in its 2015 report, "The State of Teacher Diversity in American Education," the Albert Shanker Institute outlines why teacher diversity is an "educational civil right for students." Citing social science research across disciplines, the report documents the benefits of a diverse teaching force for Black, Hispanic, and Native American students, as well as the ways all students "would benefit from a teaching force that reflects the full diversity of the U.S. population."

In 2011, the publication of groundbreaking research by Richard Ingersoll and Henry May drew national attention to the significance of retention problems among minority teachers. They demonstrated that the gap between the percentage of minority students and teachers in U.S. schools "is not due to a failure to recruit new minority teachers." Instead, the gap is explained more by higher turnover rates for minority teachers compared to white teachers – largely attributed to poor working conditions in their schools. Research published by the Learning Policy Institute also identifies working conditions as crucial for teacher retention, along with strong teacher preparation, adequate compensation, hiring and personnel management, and support for new teachers.

The SUNY charter school proposal is founded on elements that are diametrically opposed to the state of knowledge about what attracts and retains qualified teachers in general, and teachers of color in particular. Teacher turnover in the SUNY charter school network is already substantially higher than it is for public schools in the state. New York State Education Department data for 2015-16 indicate that 117 SUNY charter schools have teacher turnover rates above the state average of 11 percent. More than 50 of them have turnover rates ranging from 20 percent to 40 percent, 27 have turnover rates ranging from 41 percent to 50 percent, and 28 have turnover rates ranging from 51 percent to 92 percent. Weak teacher preparation and short-term "certification" that will institutionalize a revolving door of teachers, flies in the face of prevailing standards and knowledge in the education field about how best to serve the educational needs of diverse and high-needs students.

It will set back ongoing efforts in New York State to build a more diverse, stable corps of teachers across the state.

If enacted, the proposal will undermine ongoing efforts to **attract and retain** qualified teachers of color who will be enabled to pursue long-term careers teaching diverse youth in P-12 schools. It will impact the broader teaching workforce in the state as well as in charter schools. The proposal's negative impact beyond SUNY's charter school network will follow from the destabilizing effect it will have on teacher preparation in the state. It will disadvantage students in SUNY's accredited teacher preparation programs - as well as those in accredited teacher preparation programs in CUNY and private colleges - with regard to the cost and time required to enter the teaching field through college-based teacher preparation and completion of the New York State certification exams and required teacher performance assessment (edTPA). Review of the proposal must be situated within the broader context of the teacher education goals set by the state through its legitimate policy-making processes. At least two major state efforts are undermined by the proposal: expansion of programs to

recruit and support socio-economically disadvantaged students and students of color for entry to the teaching profession, and the extensive effort to increase the rigor and breadth of the state's teacher certification exams.

NYS Teacher Recruitment Efforts

An extensive effort on the part of the NYS Education Department, Board of Regents, and teacher education professionals across the public and private sectors has been underway to develop more financial supports and support services to enable citizens from all socio-economic and ethnic backgrounds to enter and successfully complete all requirements to become well-prepared, certified teachers in the state. Creating a "fast track" with lower standards and the illusion of a pathway to the teaching profession, is a disservice to prospective teacher candidates and will undermine the difficult work still needed to further advance recruitment and retention of a qualified, diverse, long-term teaching force for the state.

Investment in efforts to attract diverse candidates into the teaching field through partnerships between SED, the Board of Regents, college/university teacher preparation programs, and P-12 schools have been underway for many years. Expansion of those efforts has been identified as a priority by the State Education Department and Board of Regents, and accepted by the Executive and Legislative branches through the budget process. The Teacher Opportunity Corps (TOC) is a focal point of those efforts. With the adoption of the 2016-17 budget, New York became the first state to enact the federal My Brother's Keeper initiative into law. The TOC, embedded in this initiative, helps colleges and universities enhance programs that prepare teachers to serve in at-risk and high-needs school settings. It is designed to "increase the participation rate of historically underrepresented and economically disadvantaged individuals in teaching careers." One element of NYS's commitment to My Brother's Keeper is to ensure "equitable access to high quality schools and programs."

In addition to the TOC, many SUNY, CUNY, and private colleges have special programs to recruit diverse teacher candidates. They bring P-12 schools into partnerships with colleges and universities to implement "Grow Your Own" programs and other successful models to attract teacher candidates and provide them with the supports they need to succeed and meet increasingly high standards. Examples include the partnership between SUNY's Buffalo State and the Urban Teacher Academy at McKinley High School in Buffalo, designed to support students of color in pursuit of a teaching career; SUNY Cortland's Urban Recruitment of Educators (CURE) program, which prepares teacher candidates to teach in high-needs schools; and SUNY Oneonta's Robert Noyce Scholars Program, which prepares talented science majors for successful careers as Grade 7-12 science teachers in high-needs urban and rural schools.

While enrollments in teacher preparation programs across the state and nationally have declined steadily in recent years, New York State has made notable progress in maintaining - and in many cases expanding - efforts to recruit and support teacher candidates of color. The last five years of New York State Title II data, covering 2010-2015, indicate that the percentage of Hispanic/Latino individuals enrolled in teacher preparation programs has risen from 10 percent to 15 percent, for Black or African-American individuals from 8 percent to 10 percent, and for individuals who identify as "two or more races" from 1

percent to 3 percent. While overall declines are still the predominant trend in program enrollment, these data indicate that efforts to recruit teachers of color continue to expand—even in the most difficult climate we’ve seen for teacher recruitment in a century. While programs such as the TOC and college-based initiatives have seen demonstrable success, enhancement of their work requires additional focus and resources. These efforts should not be derailed by diverting attention toward what may appear to be a quick, easy fix to address teacher workforce problems in the SUNY charter school network. The needs of our children require steadfast focus on the more difficult, but essential, need to expand educationally sound teacher recruitment and retention strategies.

The SUNY charter school proposal will counteract the more difficult work embodied by the TOC and other college/university-based programs. The latter are building their efforts through community-based P-12 and teacher preparation program collaborations. To divert potential teacher candidates away from this sound path will be counterproductive for them and for the students of New York State.

Efforts to Strengthen the NYS Teacher Certification Exams

In 2014, NYS began to implement a new suite of teacher certification exams and a required teacher performance assessment (edTPA) for student teachers. Initial problems with the new exams (validity and reliability problems and the need for adequate student and program supports) have been under continuous review by NYSED, the Board of Regents, and professional educators. After substantial collaborative work, many needed revisions have been adopted (as with the edTPA and many Content Specialty Tests) or are in process (as with the Educating All Students Exam). The state’s new teacher certification process has been very demanding on teacher candidates, and efforts to support student preparation for the exams and successful completion of the performance assessment, as well as to reduce student costs associated with certification, are still in process. The SUNY charter school proposal presents a stark contrast to the situation facing teacher candidates who pursue their career through sound, professionally sanctioned processes. The assessment of one teacher educator upon first reading the SUNY charter school proposal sums up the situation: “New York State has made it more difficult for qualified people to become teachers and would now make it super easy for unqualified people to become teachers.” It is not possible to reconcile that contradiction. If allowed to stand, the SUNY charter school proposal will undermine quality teacher preparation in New York State.

Finally, two additional points must be acknowledged. First, connected to the massive effort to develop a sound system of state certification exams, the State Education Department has convened a state clinical practice work group to examine student teaching experiences offered through teacher preparation programs to consider ways to lengthen and enhance this important clinical experience for teacher candidates. The fact that the SUNY charter schools would have no student teacher experience outside of their internal “teacher preparation program” is antithetical to clinical practice standards. It also stands in stark contrast to New York State’s plan to comply with the Every Student Succeeds Act (ESSA), which includes emphasis on the need “to explore enhancements to current clinical practice requirements for aspiring teachers and leaders.” Second, the contradiction between the SUNY charter school proposal and everything embodied by SUNY’s TeachNY initiative is stunning. UUP will submit a separate letter to enumerate the specific ways the proposal stands in contrast to the TeachNY Advisory Council’s lengthy report and recommendations

and the June 21, 2017 SUNY Board of Trustees resolution approving TeachNY as SUNY's new educator preparation policy.

Sincerely,



Frederick E. Kowal, Ph.D.
President
United University Professions

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Cc: Members of the SUNY Board of Trustees
SUNY Chancellor Nancy Zimpher
NYSED Commissioner Mary Ellen Elia
Board of Regents Chancellor Betty A. Rosa
Members of the NYS Board of Regents

List of sources:

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"Solving the Teacher Shortage: How to Attract and Retain Excellent Educators"

<https://www.learningpolicyinstitute.org/product/solving-teacher-shortage>

"Recruitment, Retention, and the Minority Teacher Shortage,"

http://www.cpre.org/sites/default/files/researchreport/1221_minorityteachershortagereportrr69septfinal.pdf

My Brother's Keeper Guidance Document:

<http://www.regents.nysed.gov/common/regents/files/MLK%20Brief-FINAL%2012-5-16.pdf>

SUNY charter school teacher turnover rates:

<https://data.nysed.gov/reportcard.php?instid=800000081568&year=2016&createreport=1&eachturnover=1>

NYS Title II data:

<https://title2.ed.gov/Public/Report/StateHome.aspx>

New York State's Revised Draft Every Student Succeeds Act (ESSA) Plan Summary, July 2017

<http://www.p12.nysed.gov/accountability/essa/documents/ny-essa-plan-summary-draft-july-2017.pdf>