



United University Professions

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

September 6, 2017

Dear Mr. Rossi:

As chair of the United University Professions Task Force on Teacher Education, which includes academic and professional faculty from teacher education programs across SUNY's state-operated campuses, I submit the following comments on draft regulations SUN-30-17-00024-P pertaining to teacher certification in SUNY charter schools. UUP has participated in and closely followed the development of SUNY's TeachNY process. We have reviewed the June 21, 2017 SUNY Board of Trustees resolution that approved SUNY TeachNY Policy as a replacement for the State University's former policy on educator preparation and the May, 2016 TeachNY Advisory Council *Report of Findings and Recommendations*. In addition to the reasons presented in UUP President Frederick Kowal's August 20, 2017 comment letter, we oppose the proposed regulations because of their irreconcilable conflict with the principles and recommendations underlying SUNY's TeachNY initiative.

In the interest of remaining as brief as possible in order to draw out some of the most salient contradictions between the charter school proposal and TeachNY, the sections below highlight key points but are not exhaustive in identifying all details about the inconsistencies between the two.

Conflicts with June 21, 2017 SUNY Board of Trustees Resolution

The Board of Trustees Resolution includes among its core principles that "[t]eaching is a practice profession requiring study that is academically rigorous, clinically based, content-rich, and informed by research, preparing candidates to apply the science and art of teaching and learning...." It states that the "SUNY campuses and System Administration will work collaboratively to implement this TeachNY policy, a new standard of excellence for educator preparation that aligns with existing state and federal policies...." Through this resolution, the Board of Trustees committed SUNY to preparing educators "through rigorous academic study and clinical practice" by developing "candidates' deep content and pedagogical knowledge and skills," providing "culminating clinical experiences that are diverse and immersive," and developing "candidates' information/digital literacy and skills to effectively deploy instructional technologies, applications, and resources that enhance differentiated instruction and expand student learning at both individual (personalized) and group levels."

The SUNY charter school proposal is inconsistent with the above commitments made by the Board of Trustees Resolution for the following reasons:

- It lacks the academic rigor of teacher preparation programs that must meet state regulations and teaching standards in addition to national accreditation standards;

- Its proposed teacher preparation program is not informed by research. There is no evidence-based foundation to support it. Instead, it bypasses established teacher preparation standards and practices that have been informed by research;
- It does not align with existing state policies, most notably the requirements for teacher certification;
- It does not align with federal policies, including New York State's plan for implementation of the Every Student Succeeds Act;
- It does not require an external clinical experience supervised by a certified teacher;
- It does not require a specific and verifiable content and pedagogical knowledge base for teacher candidates.

Finally, it does not align with SUNY's own teacher education program curriculum and clinical placement requirements.

Conflicts with May, 2016 TeachNY Advisory Council Report of Findings and Recommendations

The introduction to the TeachNY Advisory Council Report asserts the "strongly held position...that education is a discipline that must be reliably selective, supportive, clinically rich, rigorous, and continuous throughout a teaching career. The importance of excellent teaching, because of the quantifiable impact it has on students—tomorrow's leaders, tomorrow's citizens, tomorrow's parents—requires that it be viewed and treated as the most serious of professions. As we often say, one does not put a pilot in a cockpit without many hundreds of hours of intensive training. One does not want a brain surgeon whose only experience is as a general practitioner. A five-star restaurant does not open its door with a chef who has not honed and demonstrated his or her skills over years of practical training. Teaching, as a practice profession, should be thought of as no less demanding and treated no differently than these and so many other professions (p. 2)."

The starting point for TeachNY's recommended "continuum of development" for teachers is "strong pre-service preparation." A commitment to accreditation, high standards, accountability, and partnerships between P-12 and college programs underlie the report's substantive recommendations for strong teacher preparation. In what follows I will explain some of the ways the SUNY charter school proposal stands in opposition these elements of TeachNY.

Excellent Educator Preparation

Chapter 2 of the TeachNY report focuses on the design of curriculum and the structure of pre-service education. It emphasizes the need for educator-preparation programs "that are guided by a clear conceptual framework; support the mastery of content knowledge and pedagogical skills in an integrated fashion; and have educational milestones that recognize a student's successful performance in academic and clinical engagements (pg. 37)." Providing clinical experiences that are "integrated throughout the educator-preparation experience" and "built into course curricula" are key goals (pg. 40). TeachNY's vision is for an integrated clinical experience that brings a teacher candidate into multiple clinical settings, with feedback from "various mentors throughout the preparation experience, from the earliest courses through intensive clinical experiences, possibly including a residency program (p. 41)."

The SUNY charter school proposal stands in opposition to TeachNY's recommendations for "excellent educator preparation" because it lacks both a clear and accredited curriculum and an external, supervised student teaching experience. Instead, it proposes an internally created and authorized system for curriculum, without a clinical experience that meets SUNY's current requirements and future goals. Goals set out by TeachNY take as their starting point existing requirements for all college-based teacher preparation programs and go beyond those requirements to propose enhancements. All New York State educator preparation programs must go

through the state program review process to be registered as academic programs and must meet stringent standards to become nationally accredited. Before completing those processes, they must meet their college curriculum requirements. The charter school proposal does not meet SUNY, state, or national requirements for educator preparation programs and cannot meet TeachNY's proposals for enhancement.

Accreditation

New York State programs that lead to teaching certification are required to be nationally accredited. Many have gone through accreditation with The National Council for Accreditation of Teacher Education (NCATE) or The Teacher Education Accreditation Council (TEAC) in the past and must now meet new, stringent standards set by the Council for the Accreditation of Educator Preparation (CAEP) for accreditation. CAEP Standards include content and pedagogical knowledge; clinical partnerships and practice; candidate quality, recruitment and selectivity; program impact; and provider quality assurance and continuous improvement. In addition to CAEP, individual programs often elect to seek national recognition through their respective Specialized Professional Associations (SPAs). Programs must meet SPA standards for curriculum and educator preparation in order to receive their recognition. Examples include the Council for Exceptional Children (CEC) for special education, the American Council on the Teaching of Foreign Languages (ACTFL) for foreign language programs, the National Association for the Education of Young Children (NAEYC) for early childhood education, and The National Association of Schools of Music.

SUNY's proposed charter school educator preparation program bypasses required accreditation processes and standards. This is diametrically opposed to the principles espoused by TeachNY.

High Standards and Accountability

According to the TeachNY Report, "[o]ne of the hallmarks of a mature profession is the degree to which it monitors itself against a backdrop of recognized professional standards—standards that govern entry into the profession, the schools and curricula that prepare its members, expectations for professional practice and continuing development, and discipline or removal of those who do not meet standards (p. 64)." In its discussion of accountability systems and standards, it elaborates on and supports the goals of CAEP and highlights the fact that embedded in CAEP standards is the need for programs to meet diversity as well as technology and digital learning objectives. The TeachNY report supports the need for programs to provide evidence of meeting CAEP standards as well as for quality control systems and improvement plans that examine evidence of program effectiveness and identify areas where improvements can be made. Program quality and program accountability are integrally linked.

TeachNY also supports the state and federal accountability systems that teacher preparation programs must adhere to, pointing out that the State Education Department's Professional Standards and Practices Board (PSPB) reviews and consults on regulations and makes policy recommendations affecting teacher preparation. In addition, for the purpose of program evaluation and national compliance the "required certification exams evaluate program outputs of teacher and school leader programs... (p. 62)."

The SUNY charter school proposal circumvents state and national standards for teacher preparation and would operate outside of the accountability systems that are standard in the profession and codified in New York State regulations. Most notably, it circumvents the system of certification exams and the nationally recognized edTPA teacher performance assessment requirement adopted by the NYS Board of Regents. This undermines TeachNY's commitment to high standards and accountability for teacher preparation.

Partnerships Between P-12 and College Programs

The need to strengthen P-20 partnerships and extend those partnerships to community stakeholders infuses the TeachNY Report. Developing and maintaining partnerships among teacher preparation programs, higher education institutions, school districts, BOCES, and community organizations is seen as key to supporting quality education for all students. The report speaks of educator exchanges such as teachers-in-residence and professors-in-the classroom "to spend a semester integrated into the educational fabric of the other sector (p. 42)." An example of the TeachNY vision for partnerships is reflected in discussion of the value of professional learning communities that would bring P-12 and higher education partners together "to support the renewal of individuals, schools, and preparation programs. In a professional learning community model, the interests and needs of the respective partners are identified and supported. P-12 stakeholders can work with EPPs to craft curricula that reflect the current and projected P-12 teaching environment, while higher education stakeholders can keep P-12 professionals apprised of the research on best practices in the field (p. 53)."

The SUNY charter school proposal is a clear diversion from the current trend towards building better P-20 partnerships. Instead, it eliminates them. For its proposed teacher preparation, the SUNY charter schools would replace professors of education with classroom teachers (most of whom would not be certified according to NYS certification standards), whereas current partnerships between teacher preparation programs and K-12 schools involve a complex system of collaboration among education faculty, classroom teachers, and field mentors across the two sectors. This is diametrically opposed to the TeachNY vision and recommendations.

In closing, I implore to you consider the fact that the very essence of the charter school proposal is counter to SUNY's new teacher preparation policy and other aspects of the TeachNY initiative. To accept it will seriously undermine SUNY's credibility as an institution committed to teacher quality and professional standards for teacher preparation and seriously compromise the future of its college and university teacher preparation programs.

Sincerely,



Jamie F. Dangler, PhD
Vice President for Academics
United University Professions

cc.

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