



September 11, 2017

Ralph A. Rossi
SUNY Charter Schools Institute
State University of New York
41 State Street
Suite 700
Albany, New York 12207

Dear Mr. Rossi,

The NYS Congress of Parents and Teachers, Inc. (NYS PTA) is honored to represent nearly 300,000 parents, families, educators and ALL students across New York. It is our mission to make every child's potential a reality and support ALL children with ONE voice. With that goal, we wish to ensure every child has equitable access to highly qualified and well trained educators and school leaders.

We write to you with great concern regarding draft regulations found in SUN-30-17-00024-P, which relates to teacher certification in charter schools regulated by the SUNY Charter School Institute.

Concerns

NYS PTA fully supports a parent's right to make educational decisions for their child, including the decision to have their child attend a traditional public school, a charter school or a private or religious school.

We are seriously concerned, however, that your proposed regulation will negatively impact children in your regulated charter schools.

In Conflict with SUNY's TeachNY

NYS PTA is privileged to have a seat on the TeachNY Roundtable, a joint endeavor by then-SUNY Chancellor Nancy Zimpher and NYS Education Commissioner MaryEllen Elia -

<https://www.suny.edu/teachny/>

In our experience, this collaboration has been open, positive, and visionary in attempting to better prepare educators and school leaders with strong field experiences, practical and theoretical frameworks for reflective teaching practice as demonstrated by the National Board Professional Certification for Teachers, and continual professional learning through the practices of mentoring and coaching, while reinforcing the need for demonstrated mastery of content and pedagogy.

It is highly unusual that a partner in this collaborative would offer regulations, to a select group of schools, that seem completely contrary to the goal of TeachNY, a SUNY initiative to strengthen and support the teaching profession; especially as the TeachNY initiative continues to meet and consider possible recruitment, training, and pathways for leadership of teachers to strengthen the profession. There is no evidence that truncated teacher preparation produces equivalent or improved outcomes for children in charter schools.

Please review this May report of TeachNY here - https://www.suny.edu/media/suny/content-assets/documents/teachny/TeachNY-Report_20160518_Final.pdf

Contrary to Regulation

Further, teacher certification and preparation requirements have been established through research and a data-driven process and set in regulation by the Commissioner of Education and the NYS Board of Regents.

The State Education Department and Board of Regents are the appropriate and transparent state educational decision-making body, and your draft regulation seems to attempt to circumvent these established requirements; in essence it would allow many who may be unqualified to teach in charter schools regulated by your institution.

As opposed to the stringent requirements of current teacher certification and preparation, your draft regulation allows people to teach children in a K-12 setting with as little as 30 hours of instruction and study, little training in a school building, and no guarantee that training includes practical hands-on classroom experience with enough pedagogy and child development structure in the subject area taught by the "teacher."

This regulation would establish a "second-tier" or "lesser-tier" of educators, who would not be able to teach in another school unless it was regulated by your institution. Such limitation

would be a great disservice to those certified under this regulation, and provides limited mobility across other public, private, and charter schools, creating a stunted career path for those “educators.”

Uncertified Instructors

Further, these proposed regulations allow untrained or uncertified instructors and/or teachers to teach or mentor new “teachers,” in contrast to the authorized teacher preparation programs, where programs, courses and mentoring is conducted by qualified professors and certified teachers. If someone is uncertified in their profession, it makes absolutely no sense to allow them the right to instruct new teachers in that same profession.


Conclusion

For the aforementioned reasons, we are most concerned with this proposed regulation. Please accept this submission as official comments from the NYS PTA on SUN-30-17-00024-P.

Parents want what is best for their children. We see learning from uncertified, not trained, or under-trained “teachers” as a dangerous experiment foisted on our children. Children cannot afford to lose a year of appropriate instruction. Further, you will be establishing a class of “teachers” who are pigeon-holed into moving on in their profession, a huge detriment to each of these “teachers” certified by your institution. These dangerous changes would occur without research or data suggesting that this “alternate path to teaching” is sound.

We look forward to a better solution for SUNY charter schools and hope that you will continue to seek input into decisions that will advance the love of learning for all children.

Sincerely,



Gracemarie Rozea, President



Kyle Belokopitsky, Esq., Executive Director