

COMMUNITY EDUCATION COUNCIL DISTRICT 3

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August 15, 2017

Susan Miller Carello
Executive Director
Charter Schools Institute
State University of New York
41 State Street, Suite 700
Albany, New York 12207

Re: Charter School Teacher Certification

Ms. Carello:

The members of Community Education Council for District 3 of New York City (CEC3), who represent Manhattan's Upper West Side and parts of Harlem, stand united in our opposition to the proposed loosening of charter school teacher certification requirements being discussed by the SUNY Board of Trustees' Charter School Committee ("Charter Committee").

Under the current rules, each New York charter school shall employ no more than the lesser of (a) 15 uncertified teachers or (b) no more than 30% of their teachers who are uncertified. The proposal by the charter school networks would eliminate these minimums and would threaten the quality of education for some of our most vulnerable students.

New York State Codes, Rules, and Regulations (NYCRR), Title 8, Chapter II, Subchapter A, Part 52 promulgate the required curricula that registered teacher preparation programs must abide by. All sanctioned teacher preparation programs (the "Teacher Prep Program") include in-depth studies of human development, learning, the needs of students with disabilities, language acquisition and literacy for native English speakers and English Language Learners, curriculum and planning, the history and role of education in American society, and the means for continuously updating professional knowledge, as well as identification of child abuse, information to help children avoid abduction, means of preventing school violence, and means of preventing harassment, bullying, and discrimination. Any potential teacher that wants to be a certified teacher in the State of New York must complete a registered teacher preparation and must also pass an extensive state administered examination and must complete a mandated performance assessment.

All Teacher Prep Programs include a minimum of 100 hours of field experience which expose the teacher candidate to classroom teaching. This practical experience includes (a) time spent working with students with disabilities and English language learners, (b) exposure to students with different levels of educational and social development, (c) engagement with socioeconomically disadvantaged students and families, and it (d) provides each candidate with full-time certified teacher mentors and supervisors. Furthermore, student teachers must spend a minimum of 40 instructional days in a classroom with teacher mentors and supervisors that are rated effective or highly effective or who hold National Board Certification in the area of concentration that the student teachers are pursuing.

These stringent rules and teacher certification programs are designed to ensure that all students throughout New York State, regardless of their background, opportunities, and location, have access to the

same highly qualified and thoroughly prepared teachers, a vision embodied by the Chancellor of the State University of New York's ("SUNY") memorandum of June 21st, 2017 detailing the goals and proposed elements of the TeachNY policy for educator preparation at all SUNY campuses.

Unfortunately, the Charter Committee has recently proposed regulations for the certification of charter school teachers that directly contradict the purpose of having certified teachers in charter schools and that embody none of the TeachNY goals and elements. The Charter Committee's proposed revision to NYCRR Title 8, Chapter V, Subchapter E, Part 700 ("Title 8, Chapter V") would permit SUNY authorized charter schools to subvert the goals and benefits of registered Teacher Prep Programs by creating their own teacher certification programs. The proposed Charter Committee regulations would seriously undermine the quality of the student teacher education by requiring only 30 hours total of teacher instruction and a total of 100 hours of classroom experience supervised by "teachers" who may not be rated effective or highly effective or who hold National Board Certification and whose experience may be limited to completion of Teach for America. If this proposal passes, SUNY authorized charter schools would have far fewer teachers who have made significant study of children, learning, and teaching and would have teachers whose classroom experience was less than one third of traditionally prepared teachers.

The Charter Committee admits in its own words in the proposed revision to Title 8, Chapter V, that SUNY charter schools "have had difficulty hiring teachers certified in accordance with the requirements of the regulations of the commissioner of education". This language suggests the purpose of the proposed regulation is to enable charter schools to bypass the Commissioner's regulations rather than to ensure that all children have access to teachers who are rigorously and thoroughly prepared to teach and thus will enable SUNY charter schools to fill their ranks with less prepared teachers and will ultimately allow for the creation of more charter schools.

Furthermore, teachers granted "certification" in a charter school program approved under the proposed Charter Committee regulations would be limited to teaching only in SUNY authorized charter schools. This would undermine such teachers' ability to teach outside of the charter school system as they would be considered "unqualified" to teach in the New York Public School system.

The charter school system has taken hold predominantly in communities of color whose schools operate in communities impacted by poverty and whose students usually come from socioeconomically disadvantaged backgrounds and are some of our most at-risk students. Passage of the Charter Committee proposed regulations would flood charter schools in poorer neighborhoods with teachers that are under qualified. All students, including minority children and those whose families are in or near the poverty level deserve the same highly qualified teachers that are available in other communities. We, the members of CEC3 demand that the Charter Committee immediately withdraw the proposed revision to Title 8, Chapter V, and further demand that such proposal not be resubmitted for consideration. We further demand that (a) SUNY authorized charter schools be required to recruit and work to retain highly qualified and thoroughly prepared teachers for their students as called for in the Commissioner's regulations, (b) that SUNY embrace the vision of teacher preparation detailed in the TeachNY resolution and (c) that SUNY investigate the working conditions and educational practices at SUNY authorized charter schools that impede their ability to recruit and retain highly qualified and thoroughly prepared teachers and to enact changes in their oversight practices that would address those conditions and practices.

Regards,

Community Education Council District 3

Cc: Chancellor Carmen Fariña, New York City Department of Education
U.S. Congressman Adriano Espaillat
U.S. Congressman Jerry Nadler

Joseph W. Belluck, Chair, SUNY Board of Trustees
Commissioner MaryEllen Elia, New York State Education Department
Regent Chancellor Betty A. Rosa
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