



MEMORANDUM

The position statement here is in response to a November 8, 2023 memo issued to colleges and universities by the New York State Education Department (NYSED) outlining potential regulatory changes to educator preparation. The New York Association of Colleges for Teacher Education (NYACTE) commends NYSED on its open and collaborative approach for receiving feedback. NYACTE is the state's association representing educator preparation programs across both public and independent sectors. NYACTE seeks to work with state leadership and other entities to ensure the overall quality and effectiveness of educator preparation for New York's Prek-12 classrooms. We understand the importance state-level policy contributes to this aim.

NYACTE understands that underprepared teachers are twice as likely to leave the profession compared to well-prepared teachers¹. This research makes quality educator preparation increasingly important considering a critical teacher shortage within the state. Yet, other factors have also been shown to negatively impact teacher recruitment and retention such as low pay and burnout. A fuller understanding of the conditions shaping the teacher shortage in New York is needed to inform holistic improvements in both policy and practice.

NYACTE recognizes numerous research studies²³⁴ that underscore the importance of teacher quality and its effect on students' performance and learning. Specifically, teacher quality matters and it is one of the most significant school factors regarding student achievement. The diverse needs of students and schools continue to shape factors for preparing and maintaining the professional knowledge of high-quality educators.

NYACTE supports and encourages NYSED and state leadership in their efforts to develop policies responsive to the needs of learners, schools, communities, and the profession of educator preparation, while ensuring aligned coherence across current and future policies.

¹ Espinoza, D., Saunders, R., Kini, T., & Darling-Hammond, L. (2018). *Taking the long view: State efforts to solve teacher shortages by strengthening the profession*. Learning Policy Institute.

² Darling-Hammond, L., (2000). Teacher quality and student achievement: A review of state policy evidence. *Education Policy Analysis Archives*, 8(1), 1-44.

³ Boyd, D., Grossman, P., Lankford, H., Loeb, S., & Wyckoff, J. (2005). *How changes in entry requirements alter the teacher workforce and affect student achievement*. Albany, NY: Teacher Policy Research.

⁴ Aaronson, D., Barrow, L., & Sanders, W. (2003). *Teachers and student achievement in the Chicago public high schools* (Working Paper Series No. WP 02-28). Chicago: Federal Reserve Bank of Chicago.

For continued, high-quality educator preparation NYACTE poses the following position for state policy related to the state’s educator preparation programs. In addition, we share our collective position on each of the proposed regulatory changes below.

- Ensure that all state approved educator preparation providers and programs of study are held to the same standards and quality assurance measures, such as national accreditation.
- Foster policies and procedures that support innovation in educator preparation and streamline timely review for program approval.
- Develop data systems whereby program completer effectiveness, hiring patterns, and the conditions leading to retention and attrition are regularly made available to state educator preparation programs.
- Champion policy that fosters equity for access to high-quality educator preparation, entry into the profession, career ladder progression, and the retention of educators, particularly those from New York’s historically underrepresented communities.
- Incentivize school-university partnerships for educator preparation regarding clinical supervision and professional development that inform educator effectiveness and P-12 student learning and success.
- Continue to demonstrate a proactive and collaborative approach for policy development that recognizes the voices of diverse stakeholders.
- Collaborate with New York higher education institutions to develop data and research centers to monitor and report on the effectiveness of educator preparation policy.

Proposed Regulation	NYACTE Position
Certification Examinations	<p>NYACTE supports this proposal in concept and appreciates the potential for greater flexibility for entry into the profession.</p> <ul style="list-style-type: none"> ● NYACTE expresses broad concern regarding vetting of certification test vendors and test content, comparability of content across vendor exams, and cost of exam administration. ● NYACTE requests more information on data sharing of exam results from both current and new vendors. ● NYACTE supports efforts to seek exam vouchers or other assistance for candidates with financial barriers.
Additional Certificates	<p>NYACTE supports this proposal in concept and requests additional information and time for discussion.</p> <ul style="list-style-type: none"> ● NYACTE expresses concern for reduced credit hours (i.e., 18 credit hours) to add a new, unrelated content area certification without content pedagogical coursework or clinical experience requirements.

Proposed Regulation	NYACTE Position
	<ul style="list-style-type: none"> ● NYACTE seeks more information on distinctions between adding a new content area at the initial and professional levels.
Teaching Assistant Certificates	<p>NYACTE supports streamlining of Teaching Assistance certification progression levels along with pathways for certified TAs to become certified Teachers.</p> <p>NYACTE recognizes a streamlined process for TA certifications may lead to opportunities for increasing the TA to certified teacher pipeline, while maintaining expectations for high-quality preparation.</p> <ul style="list-style-type: none"> ● NYACTE expresses concern for the alignment between the proposed classroom experiences for TA certification and meeting the requirements for student teaching leading, as is currently required in state approved initial certification programs. ● NYACTE supports the development of criteria for high-quality TA clinical experiences to include supervision of a state approved educator preparation program and experienced educators.
Professional Teacher Certificate	<p>NYACTE opposes this proposal as currently written. Additional time and discussion are required to analyze the impact on teacher preparation and quality.</p> <p>NYACTE expresses concern regarding quality and equivalence of the proposed vendor models and encourages the following:</p> <ul style="list-style-type: none"> ● Ensure that coursework leading to professional certification is equivalent to graduate level rigor and provided by highly qualified individuals. ● Ensure that all approved education preparation providers are held to the same expectations and accountability for quality assurance and accreditation. ● Ensure that proposed professional teacher certification regulations alignment with those for adding a new content certification at the professional level. ● Consider a change of language such as <i>“a minimum of 30 credits graduate level credits or its equivalent in content and/or content pedagogy from a state approved education preparation provider.”</i>
Transitional Certificates	<p>NYACTE supports collapsing transitional certificates into simplified pathways.</p>

Proposed Regulation	NYACTE Position
	<p>NYACTE does NOT support proposals related to preparation program providers as they are currently written. Additional time and discussion are required to analyze the change in criteria for these providers.</p> <ul style="list-style-type: none"> ● NYACTE expresses concern and seeks more clarification on the parallels for Teaching Assistance and Teacher Certification pathways proposed in alignment with current and proposed regulations for certification. ● NYACTE seeks more information on requirements for partnerships with institutions of higher education for registering, administering, and monitoring the ongoing quality of alternate route certification programs under the proposed regulation. ● NYACTE encourages language change regarding degree bearing status of alternate route programs to include “state approved alternate route programs, may not lead to an academic degree.”
Administrator Certificates	<p>NYACTE supports this proposal in concept.</p> <p>NYACTE recognizes the benefits of this proposed change to improve efficiencies and the pipeline of eligible leaders.</p> <ul style="list-style-type: none"> ● NYACTE seeks more information on re-registration of current School Building and School District programs, as well as any changes to the current credit requirements for the School District Leader certification to be earned via traditional and Transitional D pathways.

About NYACTE

NYACTE is a professional association representing New York State institutions of higher education who prepare teachers and other professional educators. We are also the state-level affiliate of the national professional association AACTE, the American Association of Colleges for Teacher Education. The AACTE and the New York Association of Colleges for Teacher Education collaborate to strengthen our respective advocacy efforts, share experience and expertise, and expand members’ professional development opportunities.