



NEW YORK STATE ASSOCIATION FOR BILINGUAL EDUCATION

New York University

Metropolitan Center for Research on Equity and the Transformation of Schools

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Mr. Joseph W. Belluck
Charter School Committee Chairperson
State University of New York
Charter Schools Institute
41 State Street, Suite 700
Albany, NY 12207

Dear Mr. Belluck,

The New York State Association for Bilingual Education (NYSABE) is proud of our efforts to professionalize teaching for multilingual learners over its long history. In the 1970's, NYSABE actively sought, and fought successfully, to create professional preparation programs that resulted in high quality certification for teachers responsible for teaching bilingual classes and in bilingual programs. NYSABE has maintained its stance that bilingual education professionals should be appropriately prepared before teaching bilingual children, which led us recently to oppose the "quick fix" of reduced training to meet the increasing need for certified bilingual professionals, as a result of the revision of Commissioner's Regulations Part 154. In addition, to advance the profession, NYSABE prepared and adopted [Professional Standards for Bilingual Educators \(P-12\)](#).

NYSABE has wholeheartedly supported SUNY's TeachNY initiative. The goals and principles of TeachNY include the following:

- Lifting the profession "through a commitment to excellence to attract and retain outstanding candidates and practitioners";
- Recognizing that "Teaching 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";
- Teacher quality is the number one in-school factor contributing to student academic success; therefore, the preparation of, support for, and access to excellent teachers who inspire all students to learn, prepare them for college and career, and empower them to positively contribute to a democratic society as engaged citizens must be shared priorities and responsibilities."


Given our consistent stance in favor of high-quality teacher preparation, NYSABE has been deeply dismayed by the recent proposals by the Charter School Committee of the State University of New York to lower the certification standards for charter school teachers. NYSABE believes that these proposals threaten the state's efforts to professionalize and elevate the quality of the teaching profession. SUNY's proposed regulations would, in essence, let charter schools — many of which have admitted having difficulty hiring and retaining certified teachers — create their own special teaching licenses for anyone who finishes one week of specialized instruction and works only 100 hours in a classroom under the supervision of another teacher or administrator, including those who are not themselves certified.

These standards are far less rigorous than those demanded of regular public school teachers. This is hauntingly similar to a proposal to “certify” bilingual teachers to meet increased need that NYSABE opposed in 2015.

SUNY is not authorized to promulgate different certification processes for charter schools. That some charter networks, facing high levels of teacher burnout and departures, cannot appropriately staff their schools is no reason for the state to radically depart from its decades-long effort to ensure a highly qualified teacher in every classroom. This is the position that NYSABE took in the face of shortages of bilingual teachers, and we remain committed to our approach of ensuring that every teacher in public schools in New York State be fully prepared, in accordance with the existing regulations of the Board of Regents which require, for initial certification, that candidates have a Bachelor's Degree, have studied appropriate coursework specific to the area in which they wish to be certified, and have performed supervised teaching hours. In addition, to obtain certification, teachers are required to pass a New York State Teacher Certification Examination to ensure that “teachers and school leaders have the [necessary] knowledge and skills.” Given that the Court of Appeals has used teacher certification as a proxy for teacher quality, particularly with regard to the delivery of a sound basic education (see Campaign for Fiscal Equity Inc. v. State of New York, 100 N.Y.2d 893, 909 (2003)), it is no surprise that the Board of Regents has adopted such demanding standards. These standards should not now be compromised because charter schools are having difficulty meeting them. Charter school families need to be confident that their children are being taught by teachers who meet rigorous certification requirements just as NYSABE has always supported the development and maintenance of rigorous standards for teachers of bilingual students. NYSABE opposes starting down a slippery slope that will lower licensing standards for its teachers.

On behalf of the students, families, educators, members of community-based and private entities whom NYSABE represents, we thank you for this opportunity to express our concerns on the proposed charter school certification requirements.

Sincerely,



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