



Community Education Council District 15

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January 8, 2018

RESOLUTION TO OPPOSE
SUNY BOARD OF TRUSTEES' CHARTER SCHOOLS COMMITTEE
TEACHER CERTIFICATION REQUIREMENTS

The District 15 Community Education Council "CEC15" held a meeting on Monday, January 8, 2018.

After reviewing all the evidence and facts, CEC 15 passed the following resolution:

WHEREAS, CEC15 hereby resolves to oppose the Regulations (the Regulations) of the SUNY Board of Trustees' Charter Schools Committee (the Committee) NYCRR T. 8, Ch. V, Subch. E, Section 700.4 Teacher Certification Requirements;

WHEREAS, the members of CEC 15 unanimously voted in favor of this resolution;

WHEREAS, 6 voted Yes, 0 voted No, and 0 Abstained;

WHEREAS, the Regulations acknowledge that charter schools have difficulty hiring teachers certified in accordance with Part 80 of the Regulations of the Commissioner of Education, the Committee adopted an alternative teacher certification path;

WHEREAS, the Regulations eliminate the requirement to take and pass the New York State teacher certification examination as set forth in the Commissioner's Regulations (8 NYCRR §52.21, Part 80);

WHEREAS, the Regulations do not require student teaching;

WHEREAS, the Regulations only require “30 instructional hours of classroom instruction” as opposed to the minimum of 81 semester hours required for State certification;

WHEREAS, the Regulations do not comply with the rigorous teacher training program put forth in New York’s Every Student Succeeds Act (ESSA) which includes culturally responsive classroom practices;

WHEREAS, Education Law §2854(3)(a-1) already allows charter schools to hire a certain number of uncertified teachers with

(i) 3 years of classroom experience;

(ii) tenure or tenure track college faculty;

(iii) individuals with two years of experience in the Teach for America program; and

(iv) individuals who possess exceptional business, professional, artistic, athletic, or military experience;

WHEREAS, Part 80 of the Commissioner’s Regulations also provides for alternative certification pathways through Transitional B and C programs;

WHEREAS, Education Law §355(2-a) provided SUNY with new regulatory authority, the law did not provide SUNY with the broad power to promulgate regulations that override any State law or regulation that pertain to the operation of charter schools;

WHEREAS, the Commissioner has sole authority to issue teaching certificates, to promulgate regulations for teacher certification in accordance with Education Law §3004(1), and to exclusively approve teacher certification programs under Part 52 of the Commissioner’s Regulations.

The District 15 Community Education Council therefore,

RESOLVES, to oppose the Regulations of the SUNY Board of Trustees’ Charter Schools Committee NYCRR T. 8, Ch. V, Subch. E, Section 700.4 Teacher Certification Requirements on the basis of equity and best practices. SUNY’s regulations contribute to inequity by reducing access to quality teachers for charter students. We agree with the Chancellor of the New York State Board of Regents and the Commissioner of the New York State Education Department that,

“The greatest impact will be on students of color, those that are economically disadvantaged, students with disabilities who are served in SUNY-authorized charter schools.”

These students need more, not less. In the short term, the regulations might stimulate the recruitment of more charter teachers. However, will these regulations have the adverse effect of pushing diverse students out of charters because less-experienced, less-trained teachers lack the tools to meet diverse needs? Will charters become schools that only serve students free of complex challenges?

Further, diminished teacher standards are not in the best interest of students. Parents in District 15 simply do not want less-qualified, less-experienced teachers. This unilateral rule made up by the issuing entity, not the State or voters, doesn't come close to the approach of Teach for America or other alternative certification pathways. Charter schools, which claim to raise the bar for students, are conversely, lowering the bar for themselves and students with this measure. It is really emblematic of the unaccountability charters benefit from and the insulting culture we've allowed to creep into our teaching vernacular.

Non-charter public schools are able to identify quality teachers and adhere to state certification requirements. The failure of charters to recruit and retain teachers under Commissioner's Regulations (8 NYCRR §52.21, Part 80) may be unique to charters for other reasons. Those reasons could be inferior compensation, poor professional development, lack of mentoring, or disagreement with methodology and internal culture. Solving those issues shouldn't come at the expense of student educational quality.

Ultimately, CEC15 feels the new regulations adopted by SUNY will negatively impact student achievement, and thus strengthen our commitment to existing teacher certification practices as defined in Part 80 of the Regulations of the Commissioner of Education.

RESOLUTION

CC:

Chancellor Carmen Fariña

NYS Board of Regents

Commissioner of the NYS Department of Education

SUNY Board of Trustees

SUNY Charter Schools Institute

Mr. Joseph W. Belluck, Charter School Committee Chairman Charter Schools Institute

Mr. Ralph A. Rossi II, Esq., Executive Deputy Director and General Counsel

Carrie E. Gee, Ass. Counsel SUNY Charter Schools Institute

Anita Skop, Superintendent District 15

Jennifer Nagourney, NYCDOE

Karonne Jarrett Watson, Esq. NYSED

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CEC11, CEC12, CEC13, CEC14, CEC16, CEC17, CEC18, CEC19, CEC20

CEC21, CEC22, CEC23, CEC24, CEC25, CEC26, CEC27, CEC28, CEC29,

CEC30, CEC31, CCSE, CCHS, CCELL, ECC

Governor Andrew Cuomo

Mayor Bill DiBlasio

Public Advocate Letitia James

Senator Jesse Hamilton

Senator Vilmanette Montgomery

Assemblymember Jo Anne Simon

Assemblymember Robert Carroll

Council member Brad Lander

Council member Carlos Menchaca

Council member Stephen Levin