



NORTHEAST
CHARTER SCHOOLS NETWORK

September 7, 2017
State University of New York Charter Schools Committee
41 State Street, Suite 700
Albany, NY 12207

Dear Chairman Belluck, and Trustees Corngold, Spiro, and Fatta:

Thank you for the opportunity to comment on the draft regulations for Alternative Teacher Certification Compliance Pathways for SUNY-authorized charter schools. The Northeast Charter Schools Network (NECSN) is the statewide membership association for charter schools.

There has never been a timelier moment for this proposal. In addition to a widespread teacher shortage, charter schools still face a State Education Department (SED) that is unwilling to consistently acknowledge the public status of charter schools when it comes to certification (see Attachment A and discussion below). Both issues result in serious obstacles for charters to overcome. We thank you for the chance to discuss the merits of an alternative certification pathway as a solution.

It is with our mission to support and grow the high-quality charter school movement in mind that we offer the following comments in support of the proposed alternative certification path.

INNOVATION AND FLEXIBILITY

As you know, one of the foundational concepts of chartering is finding new ways to approach education. This broad goal applies to curriculum and instruction, as well as school design and structure. The concept also should be applied to staffing and human resources issues. The proposed regulations seek to create a space for SUNY-authorized schools to offer a pathway to certification for teachers who show promise and potential while also providing rigorous programming tailored specifically for the school model and instructional program.

Thus, the proposed regulatory pathway has enormous potential to help develop teachers with unique skills and abilities, and NECSN supports such efforts so students can succeed. There are potential benefits for the teachers themselves, too, as the creation of new programs may encourage the formal development of career ladders for advancement within an organization. For both small schools and larger networks it is important to develop talent and cultivate the workforce of the school(s).

There should be no limits when it comes to rethinking and reengineering teacher preparation and development. But with all due respect to traditional schools of education, those existing programs may not be ready to innovate. Charter schools, on the other hand, are designed to enable the very flexibility and open-mindedness required to undertake a drastically new approach.

OPPORTUNITIES TO STUDY EFFECTIVENESS

The programs likely to be developed under the proposed regulations will present opportunities to examine academic outcome data and other data - such as student discipline and suspension, absenteeism and retention for both students and staff, and other outcomes unique to a charter school's culture and design - to identify trends or lessons about teacher preparation.

Using this data, charter schools and researchers can pioneer efforts to examine certification program design against actual results for students. As we all know, charter schools have an outstanding track record of improving student performance already, but the work isn't done. There are still students and teachers falling short in both charters and traditional public schools. These proposed regulations will encourage new approaches so the sector can examine effectiveness and share results to better serve all children in all types of schools, it is a chance we should jump to take.

ALLEVIATING TEACHER SHORTAGES & CERTIFICATION OBSTACLES

Many charter and district schools around New York have experienced staffing challenges due to a shortage of certified teachers. When there is a shortage of a critical resource it is necessary to find ways to address the problem. NECSN is supportive of the existing alternative pathways to certification that have already been created. Pathways such as the "Transitional B", for example, were rightly created to allow career changers opportunities to pursue jobs in education, and charter staff can use this path. Problems arise for charter teachers, however, when it comes to obtaining certification through reciprocity.

The State Education Department's current approach to granting reciprocity has proven to be dysfunctional for charter schools. Consider this: a teacher in a charter school applied in November of 2016 for reciprocity based on eligible experience teaching at a charter in another state. The application was denied because SED determined charter schools are not public schools - which, of course, is not true (see Attachment A). Upon protest to the Department, the Office of Teaching Initiatives specifically requested, and received, evidence clarifying the public status of charter schools in the other state, but to no avail. After receiving the documentation, the office went completely silent, and no amount of outreach has been successful in prompting a final settlement of the issue. In fact, the SED will no longer even return this teacher's inquiries on the status of the denial. The issue has turned into a bureaucratic mess. The teacher is frustrated, especially because only the staff of the Charter Schools Office has tried to help rectify the problem; the rest of the Department has been nonresponsive.

On the other hand, we have good reason to be confident in the ability of SUNY's charter schools to develop responsible and effective programs to support teachers. For example, it is with great admiration that we've watched the team at the Bronx Charter Schools for Better Learning implement their innovative and impressive program for developing and supporting teachers in conjunction with the State University of New York at Albany. It's proof that with the right mindset and commitment, our charter leaders absolutely can achieve impressive changes both for their teachers and students.

FOCUS ON STUDENT POTENTIAL

It has been widely reported that many people oppose these proposed regulations, from the leaders of traditional schools of education to the leaders of teachers' union. We have no doubt the members of the Committee and the SUNY Charter Schools Institute staff members will carefully consider this feedback and will be responsive and thoughtful in crafting responses. We do not suggest the negative feedback should be ignored.

However, many of these opponents have been oppositional to charter schools for years, and it isn't a surprise to see many of these opponents claim dire consequences will result if charter schools have an opportunity to develop an alternative pathway to teacher certification.

It isn't logical to conclude the traditional education schools have all the answers, or that the current portfolio of certification pathways is enough. At the most basic level we know there are many struggling schools where students have been unable to reach proficiency, and we also know most are fully staffed by teachers certified in the traditional way after a stint at a college or university studying education. This isn't meant to suggest those programs have nothing to offer, or to say those teachers are all terrible; rather, it is an acknowledgement of a problem. We collectively don't have all the answers. If we did, all children would be in world-class schools. Until we reach that point in time, it would be unwise to stop trying to find new and better ways to help students achieve.

Finally, we must again point to the data – the clear majority of SUNY-authorized charter schools outperform their district counterparts – another reason we believe in granting some autonomy for teacher training. In short, they've proven themselves as successful schools for the stakeholders who matter the most - the students - and we don't doubt they will continue to be.

Thank you for your time and consideration.

Sincerely,
Andrea Rogers
NECSN NYS Director