



THE STATE EDUCATION DEPARTMENT

September 7, 2017

In contrast, the draft regulation proposes a less rigorous educator preparation model for SUNY-authorized charter schools than the existing New York State teacher certification requirements and the requirements for a registered teacher education program in New York, as set forth in the Code of Rules and Regulations (see, e.g., 8 NYCRR §52.21, Part 80). Indeed, there are many key differences between the teacher certification regulations proposed by SUNY and the requirements for state certification including, but not limited to, the elimination of the requirement to take and pass the NYS teacher certification examinations, which ensure that teachers have the minimum knowledge, skills and abilities in pedagogy and in their content area to enter the classroom and the minimum skills necessary to educate all students, including students with disabilities and English language learners.

The proposed regulations also do not require a prospective teacher to complete any coursework or fieldwork, as opposed to the minimum of 81 semester hours (at least 30 in liberal arts and sciences, 30 in the certificate title sought and 21 in pedagogy) required for State certification.

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Notwithstanding any other provision of law, rule or regulation to the contrary, the state university trustees charter school committee, as a charter entity, are further authorized and empowered, to promulgate regulations with respect to governance, structure and operations of charter schools for which they are the charter entity pursuant to section twenty-eight hundred fifty-one of this chapter.

This law authorizes SUNY to promulgate regulations with respect to the governance, structure, and operations of charter schools for which SUNY is the charter entity, notwithstanding any law, rule or regulation that previously prevented SUNY from promulgating regulations in these areas. While Education Law §355(2-

For these reasons, the New York State Board of Regents and the New York State Education Department strongly urge the State University of New York Trustees Charter School Committee to withdraw the proposed regulations.

Thank you for considering these comments. If we can be of any further assistance, please do not hesitate to contact the State Education Department at (518) 474-5844 or commissioner@nysed.gov.

Sincerely,



Betty A. Rosa
Chancellor
New York State Board of Regents



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