



August 29, 2017

Joseph W. Belluck  
Charter Community School Chair  
State University of New York (SUNY)  
Charter Schools Institute  
41 State St., Suite 700  
Albany, NY 12207

Dear Mr. Belluck:

I write today in strong opposition to the SUNY Charter Schools Committee's misguided proposal to weaken preparation and lower certification standards for SUNY-authorized charter school teachers. I write in multiple relevant capacities: as president of the 1.7 million-member American Federation of Teachers, which represents teachers and teacher educators throughout the country, including the great state of New York and on campuses of its renowned state university; as a teacher who was alternatively certified; and as a member of the search committee for the new SUNY chancellor.

The conversations from the search committee made it crystal clear that SUNY's infrastructure and considerable assets can be arrayed and aligned much more robustly to strengthen the profession that makes all other professions possible. To be successful, teachers today need more relevant preparation and support, not less. After being privy to those discussions about this great university and the educational and economic challenges, needs and opportunities of New York, I was frankly aghast to see this proposal. It seems to contradict everything SUNY stands for.

The unconscionable weakening of—and essentially exemption from—preparation and certification standards for teachers in a select group of schools is not worthy of an institution with a rich tradition of high-quality teacher preparation, and with so much recent work to strengthen preparation programs and improve certification exams and processes. Part of SUNY's and CUNY's missions is to meet the legitimate recruitment needs that any preK-12 school in this state funded by public, taxpayer funds may have, including charters run by Eva Moskowitz and other chain operators, and they should be called on and supported to do so. Why, in the guise of "shortage," allow an opt-out and a lowering of standards?

It is plainly wrong to wave a magic wand, make someone an instant teacher, and allow that person to teach high-needs students in charter schools with as little as one week of specialized instruction and 100 hours in the classroom—less professional practice than is required of cosmetologists and real estate brokers. How does that ensure students the teachers they need, or the newly minted teachers the training they need to be successful?

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The **American Federation of Teachers** is a union of professionals that champions fairness; democracy; economic opportunity; and high-quality public education, healthcare and public services for our students, their families and our communities. We are committed to advancing these principles through community engagement, organizing, collective bargaining and political activism, and especially through the work our members do.

American Federation  
of Teachers, AFT-CIO

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AFT PSRP  
AFT Higher Education  
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The proposal is not educationally sound and is fundamentally unfair to teachers and students alike. New York state already offers alternative pathways to certification, but all of them—until this—require minimally a bachelor's degree, coursework and supervised teaching specific to the proposed certification area, and the passing of an exam.

Further, SUNY is not within the scope of its legal authority in promulgating these regulations for the charter schools it oversees. When the Legislature allowed SUNY greater control over the charters it authorizes, Assembly Speaker Carl Heastie and Assembly Education Committee Chair Catherine Nolan stated: "The Legislature did not intend to delegate to SUNY broad authority to regulate the charter schools it oversees. Nor did it intend to empower SUNY to adopt regulations that are inconsistent with current laws governing charter schools, including but not limited to laws related to teacher certification requirements. ..."

And, it is worth noting that the Court of Appeals has used teacher certification as a proxy for teacher quality—a reflection of the rigorous standards adopted by the Board of Regents for becoming a teacher in New York state. That some charter schools are facing problems meeting the standards is not a sufficient reason for watering them down.

Academic and policy researchers have deepened our understanding of the root causes of teacher turnover and the growing decline in entrants to the teaching profession more broadly. The Learning Policy Institute, led by Linda Darling-Hammond, recently produced several useful studies and a number of policy recommendations for stemming teacher turnover and shortages ([www.learningpolicyinstitute.org](http://www.learningpolicyinstitute.org)), none of which involve selective and significant weakening of certification standards. Also, according to the National Conference of State Legislatures, only 23 states require the licensing of all charter school teachers. New York is among the 14 states that require a percentage of charter teachers to be licensed. Arizona, Oklahoma and Texas currently have no such requirements (<https://www.ncsl.org/documents/educ/teachingincharterschools.pdf>). And the Center for Research on Educational Outcomes (CREDO), which studies academic outcomes of charters, found in its 2013 National Charter School study that charter students in Texas and Arizona both showed fewer learning gains than matched students in traditional public schools (<https://credo.stanford.edu/documents/NCSS%202013%20Final%20Draft.pdf>).

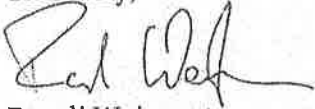
This is not the direction that New York State should be heading.

At a time when educators need to know more and more, and when children face many challenges that may come with them to school, why would we want teachers any less equipped to address their needs? And, while allowing these rules to apply only to SUNY-authorized charters might contain the damage of a wrong-headed policy, it dramatically limits the prospective teachers' career options beyond those schools.

There are many powerful examples, in New York and throughout the country, of nontraditional partnerships to enhance and accelerate teacher readiness—or to combine preparation with supervised teaching. I believe my own success as a teacher was deeply connected to my mentorship by a master teacher. Surely, the growing lessons from teacher residencies, teaching fellows programs and structured mentoring can inform a better solution. If, in fact, the SUNY-authorized

charter chains are employing such strategies and still having significant difficulty attracting professional educators, it would suggest a need for much deeper attention to the attractiveness of the workplace conditions and the nature of pedagogy and instruction in those schools. Our students, our families and our state deserve no less.

Sincerely,

A handwritten signature in black ink, appearing to read "Randi Weingarten", written over a light gray rectangular background.

Randi Weingarten  
President

RW:MUK:HN:KC: mbw opeiu#2 afl-cio

cc: Fred Kowal, AFT Vice President and President, United University Professions  
Carl McCall, Chairman, SUNY Board of Trustees  
Michael Mulgrew, AFT Vice President and President, United Federation of Teachers  
Andrew Pallotta, AFT Vice President and President, New York State United Teachers  
Betty Rosa, Chancellor, 12th Judicial District, Board of Regents  
Ralph Rossi II, SUNY Charter Schools Institute