

**Written Commentary for Public Hearing On Statewide Plan for Higher Education**  
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As a member of the SUNY deans and directors of schools and programs for the preparation of teachers and school leaders, I have had time to critically examine the statewide plan and to consider the implications of many of its provisions on colleges that prepare teachers and school leaders. Because the SUNY Deans and Directors meet regularly with SUNY officials, we have discussed many of our concerns about what we are already seeing in our NYS school partners that has had direct impact on colleges that host programs in teacher and leader education. I would like to address two areas of concern indicated in the statewide plan that may result in negative effects unforeseen when they were first proposed:

- I. The Regents Initiative on Multiple Measures for Teacher and Principal Evaluation (APPR) (pp. 21-22)
- II. New Teacher and Principal Certification Requirements (pp. 16-18)

**With regard to the first**, over the past year, higher education faculty have seen our partners in schools struggling to implement the new APPR measures fairly so that they may play their intended role of strengthening New York's teacher workforce. What we have observed has been more than a struggle to meet a more rigorous standard. We have observed some of our most effective teacher/mentors declining to take teacher candidates into their classrooms for two reasons: 1) that their focus is so completely consumed with evaluation that they feel they will not have the time to work with preservice candidates and 2) that surrendering any time at all to a practice-teacher will adversely affect student achievement and thus their APPR scores. There is no empirical evidence to support either contention. Colleges are working steadily to document and disseminate impact data that show the opposite effect—that having a teacher candidate involved in planning, curriculum delivery and assessment of learning actually enhances positive learning outcomes. However, such data are difficult to gather because student learning outcomes that result from activities provided by student teachers are—if successful—fully contextualized within the entire milieu of classroom management and performance accomplished by the *entire* teaching/ learning team that includes the mentor teacher, the student teacher and the students. While the plan for implementation of the APPR allows districts to assign up to 15 points on locally validated measures allowable for the APPR, few principals and even fewer teachers are aware of this allowance. Thus, it is not surprising that in August of this year the number of unassigned student teachers reached an all-time high of 16% for student teachers and 61% for the required 100 hours of required field experience prior to student teaching. These figures indicate an unintended negative impact on teacher education programs attempting to increase the level and complexity and duration of clinically rich school participation practices called for by the Blue Ribbon Panel. These apparently competing goals must be reconciled by the state if the statewide plan will actually achieve a greater connection between the quality of P-12 schools and the quality of teacher education programs provided by higher education partners.

**With regard to the second**, I would like to reiterate a concern about the potential effectiveness of the new edTPA as a certification requirement for all initially certified teachers in New York State. The Deans and Directors have already expressed significant reservations about the timeline proposed for the implementation of the Stanford developed portfolio assessments. Issues of practicality abound such as the variance in technical proficiencies that may inadvertently affect candidates' ability to "showcase" performance on the required video segment or the de facto curriculum changes that the instrument will necessitate in programs that are already registered with the state and accredited by NCATE. Such changes will need to take place as soon as possible to prepare candidates for successful performance on such a comprehensive measure. Further, since validation studies are only now underway (spring and summer of 2013), the state proposes 100% implementation of a certification requirement that has provided no NYS data to support the validity of this instrument to define effective teaching under the conditions of high stakes assessment at the initial level. In fact, the intended spring 2014 deployment of what is marketed as a "capstone experience" for teacher candidates who have been educated in high quality programs that were not specifically designed to lead to that specific culminating event will actually disrupt the empirically validated embedded assessments already in place in our NYSED approved and NCATE accredited teacher preparation programs for initial level certification. From a research perspective, an instrument first developed and implemented in California where **all** teacher education candidates are prepared at the post-baccalaureate level casts doubt on equating its effectiveness for the baccalaureate- prepared teacher candidates of New York State. At this time, I can find no empirical evidence to support the hypothesis that replacing embedded authentic assessments required by NCATE, professional associations and the state itself (through program registration) with a single universal capstone instrument such as the edTPA will assure a higher quality teacher *at the point of graduation*, which is significantly prior to any advanced practice that will follow it.

Therefore, I suggest—and I know many of colleagues agree—that it might be more reasonable, achievable and desirable to implement the edTPA assessment in New York State as a required assessment for *professional* rather than *initial* certification. The comprehensive nature of the instrument is better suited to help improve the quality of new teachers during their induction years when they will need rich opportunities to reflect upon their practice to develop their teaching skills. Such reflection will be that much more meaningful and informed by actual practice than it will be for candidates who prepare the edTPA during their first student teaching placement. At this time, NYS professional certification requires no further testing beyond the acquisition of a master's degree and the accumulation of a minimal number of days of teaching experience. Such a thin requirement seems counterintuitive to a reform agenda that holds teachers to a high standard of accountability. I encourage you to reconsider the plan to implement the edTPA as a required assessment for all candidates seeking *initial* certification in teaching in New York State. The rigor and authenticity you seek from the new assessments would only be enhanced if this comprehensive capstone portfolio was deployed as a formative assessment for *professional* teaching certification. This would also give the state both time and opportunity to research the application of the instrument in New York State.