



**STATEMENT AND
RECOMMENDATIONS
FROM
NYS BOARD OF REGENTS EDTPA
TASK FORCE MEMBERS**

**REPRESENTING ~ NEW YORK STATE UNITED
TEACHERS, PROFESSIONAL STAFF CONGRESS
(CUNY), AND UNITED UNIVERSITY
PROFESSIONS (SUNY)**

FEBRUARY 2015

To the Board of Regents, Legislators and New York State's Teacher Preparation Professionals:

As representatives of New York State United Teachers and its affiliates, the Professional Staff Congress (CUNY) and United University Professions (SUNY), we have participated actively on the New York State Board of Regents' edTPAⁱ Task Force, which was created by an April 30, 2014 Regents' resolution. The task force included representatives from SUNY, CUNY, and the Council for Independent Colleges and Universities, in addition to PSC, UUP, the K-12 sector and others appointed by the Commissioner of the New York State Education Department (SED). We engaged in many productive collegial discussions with Task Force members from across New York State and with representatives from the Stanford Center for Assessment, Learning, and Equity (SCALE) and the American Association of Colleges for Teacher Education (AACTE).

Our goal from the outset has been to present a set of recommendations that will continue to ensure high quality teacher preparation programs that provide students with the opportunity to become excellent teachers serving in New York State schools. We think this goal can be best achieved by providing teacher candidates with a research-based educative experience and by relying on the expertise of teacher educators.

THE TASK FORCE PROCESS:

The edTPA Task Force meetings concluded on December 19, 2014, at which time each of the Task Force's three committees submitted a list of recommendations to the Task Force's co-chairs and the Commissioner of SED. These recommendations were centered on three respective areas: policy, practice and professional development. The recommendations of the edTPA Task Force were developed through the committee process with participation by all representatives, including those appointed by SED. In a February 18, 2015 communication to Task Force members, SED Deputy Commissioner John D'Agati restated SED's understanding of the limited charge of the Task Force and said he would let Task Force members know in "...a follow up communication...how the Task Force's final [recommendations are] being utilized, and by whom." We have strong reason to believe that the final recommendations, if and when issued, will be limited to implementation issues and not reflect the full range of issues and recommendations considered by task force members.

We believe the ability of the Task Force to arrive at a full set of recommendations that would ensure a quality teaching force was compromised from the outset by the political tone set by SED combined with the policy pronouncements of then-Commissioner John King. Despite SED's stated claim of a "strong willingness to collaborate with stakeholders regarding the evolution of the edTPA in the future," we found great limitations in SED's prescribed format for the group's meetings and process. Several issues that emerged from productive group discussions addressing critical policy issues were ruled to be "outside the scope" of the Task Force's work. In addition, Commissioner King openly censored the content of our work by refusing to allow important policy recommendations to be part of the group's final report,ⁱⁱ by withholding data sets needed for the analysis of test scores,ⁱⁱⁱ and by refusing to allow adequate time for completion of Task Force work^{iv}.

At the same time that SED consistently denied Task Force requests for more extensive and specific data needed for analytical purposes, the department inappropriately released flawed institution-specific edTPA and certification exam data, accompanied by Commissioner King's public statements about closing down or merging teacher preparation programs, further compromising the integrity of the Task Force's work. SED's actions and limitations on the scope of the group's work put us in the untenable and unethical position of being forced to do only a partial job as a Task Force.

Given these limitations, the undersigned Task Force members feel that our participation on the edTPA Task Force cannot be used to justify an already determined political policy based in ideology and not in honest analysis and inquiry. **We do not want Task Force recommendations that were offered in the spirit of moderating a flawed policy's impact on our students to be portrayed as a legitimization of that policy.**

While we think the implementation recommendations issued by the Task Force committees are well-meaning and make sense within a limited context, they do not address the larger New York State teacher preparation certification and policy frameworks. To be truly meaningful, Task Force recommendations should address the broader high-stakes test context within which teacher preparation programs reside and the serious threats of teacher preparation program closure and/or consolidation based on these high-stakes tests.

An underlying intention to eliminate "underperforming" programs has been expressed publicly on numerous occasions by SED, and test scores may be used as a criterion for such determinations. It is important to consider that while test scores have been used historically to assess whether or not a program may remain in good standing with the state, at this point the scores are highly questionable as they are the result of a fundamentally flawed battery of new exams that were implemented prematurely. There is little to no evidence-based research to support the implementation of such policies. ^v

While the preponderance of research on high-stakes tests indicates a bias against lower income students and minority students, currently there is no research or understanding of what these flawed policies will mean for the future diversity of the New York State teaching force. Also, results from the new certification exams that include edTPA, EAS, and the ALST could also be used to unfairly punish students who have successfully completed four years of college preparation requirements and yet may be denied an initial teaching certificate in New York State.

Given the range and intensity of discussions among all the stake-holders on the edTPA Task Force, and the questionable and unfair circumstances of the initial certification policies adopted by SED that are currently confronting our students, we feel it is urgent to make public the recommendations that were discussed by the subcommittees and ruled out of order by Commissioner King.

We support immediate implementation of the following policy recommendations:

- 1. Remove the high stakes consequences of edTPA to allow New York State teacher preparation programs appropriate time for exploratory use of this new performance assessment, identify ways to resolve problems experienced during the first year of its consequential use in New York State, and to determine the best way to use the assessment.**
- 2. Consider the full range of performance assessment options for possible use in New York State teacher preparation programs.**
- 3. The validity and reliability of the edTPA, ALST, and EAS should be assessed in order to inform policy decisions about their high-stakes use.**
- 4. A grandfathering policy/transition plan is needed to allow for changes to initial teaching certification requirements in a way that does not unfairly penalize students.**
- 5. The role of Pearson, Inc. in the delivery of all of New York State's initial certification assessments and exams should be investigated in view of high student costs and proprietary information agreements that have shielded exam content from teacher education professionals.**

RECOMMENDATIONS

- 1. Remove the high stakes consequences of edTPA to allow New York State teacher preparation programs appropriate time for exploratory use of this new performance assessment, identify ways to resolve problems experienced during the first year of its consequential use in New York State, and to determine the best way to use the assessment.**

As the first state to require edTPA for initial teaching certification, New York's approach to implementation differs considerably from other states. In other states, including California, Illinois, Wisconsin, and Tennessee, educator preparation programs have been given constructive timelines in which to develop the necessary supports and curricular modifications necessary for the successful implementation of edTPA. While edTPA's developer, SCALE, presents it as a potentially usable assessment in a consequential context, experience in many states that have been experimenting with the edTPA for many years indicates that imposition of a high stakes component in the early stages of edTPA development is counterproductive. SCALE openly admits that it is still in the process of refining the handbooks and scoring rubrics that accompany the exam. According to SCALE, states typically have between 2-6 years in which to pilot-test, evaluate, and study the edTPA before determining how to use it. Implementation is usually done in phases. Georgia will have worked with edTPA for five years before its eventual consequential use in 2015. Wisconsin will have had 6 years of use before it goes consequential in 2016.

In addition, many states have been using edTPA in an exploratory way in order to determine *how best* to situate the assessment within their programs. Options include using edTPA as a formative assessment, a college program completion requirement, or using the results of edTPA for program evaluation or national accreditation purposes. New York only conducted a very limited pilot study for two semesters and did not allow time for the meaningful dissemination of any findings before the exam became consequential immediately thereafter in fall 2013.

Many faculty members currently object to the way edTPA imposes a standardized set of objectives that supplants existing curricula approved by faculty and by national accrediting bodies such as NCATE, TEAC or CAEP. The assessment requires a very specific set of objectives that narrows the curriculum to certain teaching behaviors and fails to address the complexity of teaching. It also assumes that someone minimally trained to score a portfolio remotely can assess teacher candidates by reviewing short video clips and written analysis according to a set of fixed standards that do not take into account the specificity of context or student demographics.

Like any high stakes test, edTPA forces teacher candidates to focus on test preparation rather than on understanding and improving their teaching during the student teaching semester which is the pinnacle of the teacher preparation program. Imposing such an external requirement within student teaching not only violates the academic freedom of faculty responsible for designing course content, but also diminishes the experiences that ordinarily occur during the most important part of a candidate's training period. Using the edTPA in a different way at this point in time might, if used judiciously, enhance the clinical experience of teacher candidates, but it does not do so in its current form.

The edTPA requires the candidate to compile a portfolio of teaching artifacts that in some ways looks similar to the type of portfolios already required by teacher preparation programs. But in stark contrast, an authentic candidate portfolio provides the teacher candidate with extensive formative feedback through narrative commentary in addition to face to face feedback delivered through the professional judgment of college faculty who are in a better position to assess the full spectrum of a candidate's teaching in the context of other measures of readiness to teach. The Pearson-scored edTPA portfolio offers only summative numeric scores, leaving candidates without the kind of feedback ultimately needed to inform their practices as aspiring educators.

Furthermore, the efficacy of videotaping in K-12 classrooms must be addressed in light of recurring privacy concerns and parental consent issues. Videotaping for the edTPA during the student teaching semester is not the same as the videotaping of Master Teachers in their own classrooms that was done previously in New York State. Policy makers must consider the unique circumstances of videotaping for the edTPA. With the edTPA, individual student teachers control classroom videotapes, making security of those videotapes problematic. Parental consent has been withheld in many cases across the state, leaving student teachers unable to complete all portions of the edTPA or impeding student teacher placements in some schools.

We have the same end goal as SED in terms of enhancing the quality of our teacher preparation programs and the clinical experience student teachers get, but we believe that SED, with its rushed implementation of the edTPA as a high stakes assessment, is not on the path to improving teacher quality. In light of current practices, requiring edTPA for initial teaching certification and positioning it during the student teaching semester merely reinforces “teaching to the test.”

2. Consider the full range of performance assessment options for possible use in New York State teacher preparation programs.

The edTPA is one student teacher performance assessment option. There are other nationally recognized options under development and many teacher education programs have successfully used locally developed teacher performance assessments for quite some time. In both California and Tennessee, edTPA is offered as one option among other performance assessments for certification. While we recognize the importance of ensuring that a strong, high quality performance assessment is used along with other measures to determine “teacher readiness,” it is imperative that teacher-educators across New York State be involved in substantive evaluation of all possible ways to meet the need for a rigorous student teacher performance assessment. State policy decisions should be better informed by actual practices and experiences already underway in our teacher preparation programs across the country.

3. The validity and reliability of the edTPA, ALST, and EAS should be assessed in order to inform policy decisions about their high-stakes use.

Also related to edTPA, the roll out of other new certification exams is creating an unfair situation for the next generation of teachers in New York State. Candidates must pass four exams —Educative Teacher Performance Assessment (edTPA), Academic Literacy Skills Test (ALST), Educating All Students (EAS), and Content Specialty Test (CST) — in order to gain initial teaching certification. The public has not been presented with evidence of field studies or proof of validity or reliability for the ALST or the EAS exams. The only information SED has made public pertains to how the cut scores were determined by a standards setting committee. At this point in time, instead of improving teacher quality, these new exams are presenting unprecedented roadblocks to initial teaching certification for both in-state and out-of-state candidates, potentially compromising the quality of the next generation of teachers in New York.

The entire package of new initial certification requirements should be reviewed by experienced teacher education practitioners in New York State to better understand the exams individually as well the relationships among them. Furthermore, numerous problems related to testing format and procedure with the ALST and EAS must be addressed immediately. Currently published pass rates for the EAS and the ALST are much lower than past exam pass rates. This indicates that a significant number of programs will fall below the required 80 percent pass rate which can trigger “corrective action” status under SED’s current guidelines and help the state to build a deceptive case for the elimination or consolidation of teacher preparation programs.

Faculty across New York State must have an opportunity to present their concerns about the flaws in the ALST and EAS in order to allow for revisions that will improve their validity, reliability, and legitimacy as measures of students' mastery of skills and content in their fields. New Content Specialty Exams (CST) being implemented during this academic year should also be reviewed and assessed by teacher education professionals in New York State. New York State's experience with the edTPA must be assessed in the full context of all new certification requirements. For example, submission rates on the edTPA have been low (students completing the edTPA portfolio during their student teaching but not officially submitting it to Pearson for scoring). Low submission rates distort the current overall pass rates, since the low edTPA submission rates in 2014 may be connected to candidates' difficulty with the other new exams and ultimate discouragement with their prospects for getting initial certification in New York State.

4. A grandfathering policy/transition plan is needed to allow for changes to initial teaching certification requirements in a way that does not unfairly penalize students.

A grandfathering policy should be developed to prevent the unreasonable denial of initial teaching certification to students who completed teacher preparation programs before the May 1, 2014 change to three new high stakes requirements: edTPA, ALST, and EAS (in addition to the CST exams that are currently being redesigned). SED's rushed implementation of the edTPA, ALST, and EAS created an unprecedented situation for students who completed teacher preparation programs before May 2014 and were recommended by their programs for initial certification but did not obtain that certification. Until now, it has been common practice in this state (and other states) to apply new requirements to an entering college class. Instead, three new certification requirements were imposed on all students who did not obtain initial certification before May 2014. This means that teacher preparation program completers who entered programs under one set of certification requirements are bound by the new requirements.

There are many legitimate reasons why students who completed their programs before May 2014 may have postponed obtaining their initial certification. For example, students may have left the state for a period of time, pursued study abroad, or suspended their efforts to obtain initial certification requirements for personal or professional reasons. Those who completed their programs before May 2014 and finished student teaching before the edTPA was required have no way to meet this new requirement. It is not practical or sometimes feasible for such students to obtain an additional student teaching placement in order to complete the edTPA. Such arrangements pose additional financial burdens for students and create distress for programs in search of already hard to find field placements for students who have not yet completed their programs. New York State may lose excellent teachers and impose an undue hardship on program completers unless a reasonable grandfathering policy is adopted.

5. The role of Pearson, Inc. in the delivery of all of New York State's initial certification assessments and exams should be investigated in view of high

student costs and proprietary information agreements that have shielded exam content from teacher education professionals.

The cost of obtaining initial teaching certification in New York State has risen to approximately \$1,000 per student. That cost, which covers the edTPA, the three other required certification exams, and fees for required workshops and fingerprinting, may be higher for students who need retakes for any component of the requirements. For example, the edTPA costs \$300 for initial submission. Some students must pay additional retake fees that range from \$100-\$300 and an additional \$200 if they want to appeal their scores.

Proprietary information agreements with Pearson have limited the extent to which faculty can share and discuss information about the edTPA. Faculty were provided with general frameworks for the EAS and the ALST before they were operational, but sample questions and practice tests are still very limited. The computer formats are cumbersome and testing site conditions are inconsistent. Many teacher education faculty have registered for and taken the exams themselves in order to learn more about their content and formatting. This situation has seriously impeded faculty in their efforts to ensure that students are adequately prepared for high stakes certification exams.

CONCLUSION:

As members of the edTPA Task Force, we participated fully throughout the meeting process. We worked willingly with SED, the Board of Regents, SCALE, AACTE, and our colleagues from across the state. All of us remain committed to improving teacher education and to ensuring that the certification process is a sound one connected with the work done by teacher educators in preparation programs.

We would be happy to answer any questions you may have or to speak with you in more detail about any of the recommendations in this report.

***Please contact Jamie Dangler at United University Professions (800) 342-4206
or Steve London at Professional Staff Congress (212) 354-1252***

Jamie Dangler, Associate Professor, SUNY Cortland
Vice President for Academics, United University Professions
1-800-342-4206; jdangler@uupmail.org

Steve London, Associate Professor, Brooklyn College, CUNY
First Vice President, Professional Staff Congress
(212) 354-1252 slondon@pscmail.org

David Gerwin, Professor, Division of Education, Queens College, CUNY

Ken Lindblom, Professor, Stonybrook University, SUNY

Jill Christian-Lynch, Teacher Center Coordinator, Jamesville DeWitt/Syracuse University Teaching Center

Maria Pacheco, Teacher, Mohonasen Central School District /District President Mohonasen Teachers Association

George Still, Assessment/Data Manager, SUNY Plattsburgh

Peter Taubman, Professor, School of Education, Brooklyn College, CUNY

ⁱ edTPA refers to the educative teacher performance assessment which became a requirement for initial teaching certification in New York State in fall 2013. The assessment was designed by the Stanford Center for Assessment, Learning and Equity (SCALE). It requires students to compile a portfolio of teaching artifacts including short teaching video clips.

ⁱⁱ While Task Force members have had extensive discussion of policy recommendations that could improve the use and implementation of New York State's edTPA, SED has determined that no recommendations will be heard regarding the implementation timeline, alternatives to using the edTPA as a summative and high-stakes assessment at this time, relationship among the edTPA and the other new certification requirements, or problems with the current edTPA safety net for 2015 graduates.

ⁱⁱⁱ Disaggregated pass rate data for the edTPA were requested by two of the three Task Force subcommittees for the purpose of assessing the first year experience with edTPA across different content areas and student populations. Removing institution names from the data was identified as critical since implementation problems, low edTPA submission rates, and continuing refinement of the edTPA by SCALE casts doubt on the validity of 2014 edTPA pass rates. The data were not provided to the edTPA Task Force for its analytical purposes, despite almost five months of Task Force work and repeated requests to SED. Instead, institution-specific data were released publicly with unsubstantiated assertions about teacher education by SED. There are two significant problems with this action:

1. In a Nov. 19, 2014 New York Times article, Commissioner King was quoted connecting the data release to potential program closure, compromising the work of the edTPA Task Force. The Commissioner also asserted the Task Force was created precisely because of serious implementation problems with the edTPA. Its charge was to focus on potential for improving the edTPA in order to address those problems. In a Nov. 18, 2014 "Letter to the Field," SED falsely asserted that public release of institution-specific data was necessary because of a FOIA request UUP filed to obtain the data for the work of the edTPA Task Force, falsely associating the union's edTPA Task Force work with SED's inappropriate release of highly flawed edTPA data.
2. Release of edTPA pass rates violates the April 30, 2014 Regents edTPA Safety Net resolution. The resolution states that "The Department will not use edTPA scores in the State's institutional profiles until the 2015-2016 academic year." SED's Nov. 18, 2014 "Letter to the Field" explicitly connects the Nov. 19, 2014 posting of edTPA and other certification exam pass rate information to the institutional profiles. The edTPA data posted are data for those institutional profiles.

From the outset, Task Force members have made requests for essential data sets in order to examine who is taking these tests, submission rates, success rates, patterns of passing and failure by students,

and an examination of many other parameters that would allow a better understanding of what these tests are measuring. The Task Force was denied independent access to SED data sets and thus could not analyze SED collected data.

Instead, SED dumped deeply flawed institutional pass-rate data into the public domain as a justification for the Commissioner's objective to eliminate college and university teacher preparation programs.

^{iv} The Commissioner denied a request from the three subcommittee chairs and the Task Force co-chairs to extend the timeline for completion of Task Force work beyond December 2014, a deadline he arbitrarily set. During a December 4 conference call with SED, the Task Force's co-chairs and three subcommittee chairs requested extended work time since discussions were still in process and it was not possible to finalize all recommendations by the December 18 deadline. The Task Force has met monthly since July, with all three subcommittees holding additional teleconferences and exchanging notes and draft proposals in between full Task Force meetings. The complexity of the problems surrounding the edTPA has made it impossible to complete substantive work under the time frame imposed by SED.

^v According to New York state regulations Part 52.21 (b) (2) (iv) on Candidate Performance on New York State Teacher Certification Examinations and Institutional Accountability ". . . in the event that fewer than 80 percent of those students who satisfactorily complete the institution's program and also apply for certification pass each required examination for a teaching certificate . . . shall require the institution to submit a corrective action plan . . . (p. 19)."