

January 6, 2014

Dr. John B. King, Jr.
New York State Commissioner of Education
New York State Education Department
89 Washington Avenue
Albany, NY 12234

Dear Commissioner King:

I am submitting this letter on behalf of NYSUT as a follow up to concerns we have previously voiced about the implementation of the edTPA. Our recommendations are related to the edTPA's use as a requirement for licensure, its impact on P-20 collaboration, and its misalignment with current state regulations.

The edTPA has the power to be a valuable and educative form of assessment. It has the potential to transform educator preparation by raising expectations for teacher candidates providing an opportunity to acquire critical skills related to planning, instruction, assessment, and reflection on practice. While teacher candidates were formerly asked to complete similar tasks in student teaching programs, the edTPA introduces a common professional language that creates a uniform set of standards for best practice for the profession. These differences could have an important impact on the way future teachers are prepared to handle the increasing challenges they must face in today's K-12 classrooms.

Unfortunately, in its effort to develop P-20 collaboration the state has made numerous critical missteps. Due to SED's poorly executed and accelerated implementation timeline, teacher candidates who are currently seniors and must pass the edTPA for an initial teaching certificate are at a great disadvantage. They have not received the in-depth preparation they need to ensure success on this rigorous and complex assessment, nor have they had adequate time to develop and practice the skills before being assessed on them. Under these flawed conditions scores from edTPA's early implementers cannot be deemed valid nor should they be considered a fair evaluation of teacher preparation programs.

Colleges nationwide considering the adoption of the edTPA recently completed pilot studies that caution against introducing edTPA skills and academic language for the first time in the student teaching semester. Effective implementation of the edTPA necessitates curricular modification beginning as early as the sophomore semesters. Educator preparation programs have simply not had the time they need to embed new learning objectives, develop the tools, and adequately prepare their students for the exam.

The truncated timeline also demonstrates a blatant disregard for the academic process in higher education. Curricular changes take time, diligence, and careful planning, and are often subject to approval by institution wide curriculum review boards. Since finalized copies of the needed edTPA handbooks were not made available until 2012, educator preparation programs were left without the time needed to make substantive changes to their programs.

Here again is evidence of the compromised validity of the exam in its current iteration in New York State.

Use of the edTPA

The edTPA is based on sound theory but its use as a high stakes exam is questionable. The new exam became available for operational use in 2013. With 34 member states in the edTPA consortium most are still in the exploratory stages of using the exam. Some like Tennessee and Minnesota are using the edTPA as a program completion requirement. Others are using it in conjunction with program evaluation. But only two states, New York and Washington, are currently using the exam for licensure.

While touted as an effective measure for program and state comparisons, differing cut scores across states make such comparisons unrealistic. According to SCALE's field test data, a cut score of 41 would result in approximately a 62.1% pass rate while a cut score of 37 could boost passing rates to 78%. Washington chose 35 as their dominant cut score. Current data from SUNY Potsdam already showed that nine of 18 students failed the edTPA exam in elementary education. This leaves us with questions about the feasibility of obtaining an initial teaching certificate in New York.

In addition, if the data from this first year of scores is reported in SED's Institutional Program Profiles, the results could be very misleading to consumers of the information and damaging to educator preparation programs that have already worked tirelessly to accommodate the changes. Institutions of High Education are understandably concerned about how overall pass rates and future enrollment will be affected by the edTPA scores.

State Regulations

Another issue with the edTPA's shaky implementation relates to the state regulations which require two separate seven week placements for teacher candidates. This structure is problematic. A seven week period is not sufficient in light of the tasks demanded by the edTPA. And unlike other states, New York requires four tasks instead three in elementary education. The math assessment "sidecar" task increases the capacity for everyone involved making its implementation even more demanding than in other states. The addition of a fourth task also compromises the integrity of reliability studies previously conducted through field trials that consisted of only three tasks in elementary education in most cases.

According to SCALE's recommendations the edTPA should be taken towards the end of a student teaching placement giving candidates adequate time to know their students, understand their learning needs, and plan meaningful instruction to address them. Teacher candidates who do not pass an edTPA task on the first try can resubmit portions of their portfolio, for an additional fee, within the allotted turnaround time. Pearson claims they will return materials within 30 days. This makes the logistical implementation difficult in a student teaching placement that is typically only seven weeks long.

P-20 Collaboration

In conjunction with the launching of the edTPA, there has been a strain on securing high quality settings for student teaching. Because many K-12 schools are overwhelmed with other new and complex reforms, they are reluctant to engage in school partnerships making it very difficult to find placements. These partnerships are vital to the education received in educator preparation and essential to the P-20 partnerships inspired under the Regents Reform Agenda. This unintended consequence deserves immediate attention.

The state's response to offer a waiver for the two student teaching placements was a major shortcoming. Because the waiver application asked for additional steps that present new requirements on already overtaxed systems, it is likely that many Educator Preparation Programs (EPP's) have been discouraged from applying for them. Requiring signed agreements and designating other new requirements for cooperating teachers' APPRs scores is unprecedented. These

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stipulations are not present in a program's original registration and it is therefore unfair to require these items for a program that is trying to alter its structure in order to accommodate new reforms.

In your letter dated October 9, 2013 you asked your colleagues to consider hosting a "well trained student teacher." This request points up a serious misconception: a student teacher is not yet "well trained." The purpose of student teaching is to gain that training. It is an intensive clinical experience and using the edTPA at that time as a summative assessment is inappropriate. It interrupts the intensive coursework and preparation already designated and approved via state program approval and national accreditation.

Student teaching is intended to be the pinnacle of a teacher candidate's preparation experience, but in light of these new state reforms, it is being reduced to a semester long experience in test preparation. In mandating the edTPA for licensure the State Education Department has overstepped its boundaries by prescribing a new curriculum for all educator preparation programs in the state. The way an institution of higher education chooses to use the edTPA should be in their purview.

It's time to make necessary changes that should have been orchestrated prior to the launching of the edTPA. In order to best serve those dedicated to entering the profession we urge you to take the following corrective actions:

- Eliminate the student teaching waiver application (on an emergency/temporary basis) and allow institutions of higher education (IHE's) to require only one semester long placement, until the state regulations have been revised to accommodate the demands imposed by new reforms. Elimination of the waiver should go into effect immediately until the spring of 2015.
- Consider requiring the edTPA only for program completion until more is known about its capacity as a valid and reliable instrument in New York state.
- Withhold publishing the edTPA data from institutional profiles for the 2013-2015 academic years.
- Update the state regulations for student teaching to align with the requirements of current reforms.

Many of the problems with the edTPA's implementation mirror mistakes made with other areas of the Regents Reform Agenda. Let's get this one right. We are always available to work with you to ensure that New York prepares the most qualified teachers. Our students deserve that guarantee.

Sincerely,



Maria Neira
Vice President

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c: Members of the Board of Regents
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