



January 16, 2015

Jim Malatras
Director of State Operations
Executive Chamber
Albany, New York 12224

Dear Mr. Malatras,

Over the past several weeks, we have reviewed letters from Jim Malatras, Governor Cuomo's Director of State Operations and responses by Regents Chancellor Merryl Tisch, and acting Commissioner of Education Elizabeth Berlin, which framed alternate visions for the future of education in New York State. While Mr. Malatras' questions and the responses from the Regents and Education Department are complex and detailed, we believe they can be summarized in a single question:

Should the future of education in New York State be shaped by - a Governor and State Legislature or by a Board of Regents and locally elected Boards of Education in more than 700 school districts across the state?

In the belief that progress must come through a collaborative partnership with shared responsibility, New York State PTA has deep concerns about whether this form of debate can be truly effective in moving the reform process forward. We have carefully followed the discussion of these issues. We have listened to our members and other interested parties, and we have reviewed and expanded our own vision of an ideal educational future that provides the best assurance that our children will be able to thrive in a global society where success requires different skills than in the past. In that spirit, we add our thoughts to the questions raised by Mr. Malatras and addressed by others.

Where we have supported specific strategies, we will make reference to them. Where we have not, we pose questions we believe will guide our members. We will share the results of these efforts over the coming months and would encourage others to do likewise.

1. **Teacher Evaluation System (APPR). NYS PTA response: We offer our response in the form of questions, formal NYS PTA positions and recommendations based on those positions.** Before asking if the legislatively adopted teacher evaluation system is credible, might we first ask if reform actions are being implemented and if those actions are improving instruction? We conclude that the best way to answer this question is to observe reform activities in action. We believe that assessment of student progress and achievement play a role in education but when student assessment overshadows assessment of initial instructional implementation we cannot achieve the desired solution. We offer the following recommendations based on adopted NYS PTA positions:
 - Until planned instructional reforms have been properly implemented, **the links between teacher performance and student test results, should be suspended.**
 - The 60% of APPR labeled by various observers as "other", as "locally negotiated" or as "subjective" downplays this critical aspect of educator evaluation and instructional reform. **This aspect of APPR needs to be strengthened, made more objective and form the basis for a strong professional development effort.**

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- The Board of Regents adopted a set of teaching standards and performance indicators in January of 2011 following an extensive developmental effort by a broad range of stakeholders. We must expand this effort to prepare both practitioners and observers to assess teaching performance using these indicators, and then actively use the results to develop the skills of both.

2. Removal of Poorly Performing Teachers. NYS PTA response: We offer our response in the form of questions and observations that we hope will guide future discussion.

- Time, cost and perceived lack of hearing officer impartiality represent the major concerns expressed by many who object to the current 3020a discipline process.
- Current law requires a costly and time consuming process for selecting a hearing officer agreeable to both parties. Would assignment of qualified hearing officers on a rotating basis save time and improve perception of impartiality?
- Educators have a right to due process in any disciplinary actions. School districts and their administrators likewise bear responsibility for bringing accurate and thorough data to any process meriting disciplinary actions. *(This comment ties directly to our observations of the importance of the 60% portion of the APPR process).*

3. Teacher Training and Certification. NYS PTA response: We offer our response in the form of questions and observations that we hope will guide future discussion. As we examine the teacher training and certification process, shouldn't we also be asking when a teacher is ready to enter the classroom and once there, what kinds of supports that teacher needs to remain proficient and motivated?

- With all the pressures and time commitments associated with entering a classroom for the first time, should we also be asking teachers to divide their energies by simultaneously completing a graduate degree certification program or should we require that teachers meet all certification requirements prior to fully entering the classroom?
- When should the focus of preparation be on content, particularly for elementary teachers whose preparation must be broad enough to address math, science and other essential topics? When should the focus be on instruction? Does a teacher learn to teach best by actually teaching and receiving quality feedback, as opposed to from reading a textbook with performance measured through a multiple choice test?
- Shouldn't we be asking questions about evaluation, improvement and professional development activities that should take place at all stages of an educator's career?
- At what points should an educator's development be guided by others versus being guided and evaluated by the educator himself/ herself?
- How can we expect a quality certification assessment without measuring both content knowledge and actual performance?
- Should changes to the tenure period be considered without first developing well thought out plans that address time frames required to address the questions enumerated above?

4. Financial incentives for High Performing Teachers. NYS PTA response: We offer our response in the form of questions and observations that we hope will guide future discussion.

- As we seek to identify incentives for teachers to perform at the highest level, how important is it to consider what research-based evidence suggests actually motivates our highest performing teachers to become even better?
- Should we be looking at rewarding past performance or considering experiences that will improve future performance?
- If we consider career ladders, should they be only for teachers who expand activity into leadership roles, or should they also recognize master teachers who remain full time in the classroom?

- How do we model the experiences of our best teachers to improve the performance of all teachers?
5. **Struggling Schools: We offer our response as a combination of questions, NYS PTA program experiences and observations.**
- As we ask what steps are necessary to improve struggling schools, are we also asking what the students in these schools need and who ought to play a role in addressing those needs?
 - For some time, NYS PTA has promoted standards for meaningful two-way family and community engagement in the education process in the form of recommendations to the Board of Regents, legislators, community organizations and other child advocates.
 - The family and community engagement process that has led to the chartering of a PTA unit in Buffalo's School 6 closely mirrors the process used by the Education Department in assessing need and implementing turnaround strategies using the Diagnostic Tool for School and District Effectiveness (DTSDE). Shouldn't this strategy be marketed as a guide for all schools, not just those most in need of improvement?
6. **Charter Schools: We offer our response as a combination of formal positions and questions that we hope will guide future discussion.**
- NYS PTA has been supportive of the charter school concept with the proviso that **charter school funding not detract from the State's obligation to fund public schools**. Has this qualification been realized?
 - As we ask questions about vision for charter schools, should we also be asking how charters have fulfilled their original vision as "incubators of innovation and creativity"?
 - Are the lessons learned from charter schools adaptable to the improvement of public schools?
 - What have been and might be the measureable cost benefits to all public schools from the public funds used to support charter schools?
7. **Technology: We offer our response as a combination of questions, formal positions and observations based on NYS PTA program experience.**
- NYS PTA strongly supports the use of technology in our schools. With that support, we believe that such technology should be used as a tool that can supplement teacher efforts, not supplant them. Is that intent reflected in the proposed budget and SMART Bond program funding?
8. **Mayoral Control: We offer our response in the form of questions that may guide future discussion.**
- How does mayoral control differ from the fiscal dependence of our five largest school districts on their city governments? Aren't these schools already subject to substantial mayoral control? What has been the experience with mayoral control in those cities where it currently exists?
 - Where public education results have improved under mayoral control, has such improvement been the result of mayoral control, due to other factors, or more closely associated with a particular individual or administration than to the office itself?
9. **Regionalization: We offer our response in the form of questions that may be used in guiding future discussion.**
- Where district consolidation is considered, should success be defined more by dollars saved or by improvement to programs and opportunities for children?
 - Has the success of past merger attempts been strongly influenced by strong parent and community support or resistance?
 - Does the degree to which a community depends on its schools as an essential source of its identity play an essential role in the potential success of any proposed merger?

- What strategies have been considered to build collaborative community support for merger proposals?

10. Appointment and Selection Process for the Board of Regents: We offer our response in the form of questions that may be used in guiding future discussion.

- How do the Governor and legislature hold the current Board structure and themselves accountable for the effectiveness of that Board?
- Have we considered what might be done to improve the current system before we consider a different approach?
- What benefits might a new approach be expected to deliver that the current system has not or cannot?

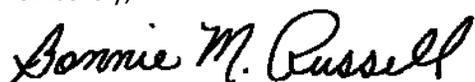
11. Selection process for Replacement of Commissioner: We offer our response in the form of questions that may be used in guiding future discussion.

- Whose ultimate responsibility is it to select and appoint the next Commissioner of Education?
- As an association, we would welcome input to the selection process. Are criteria for input and participation spelled out as part of the enumerated responsibilities of the Board of Regents?
- Is the responsibility of the Governor and legislature to participate directly in the Commissioner selection process, or to hold accountable those Regents they have appointed?

As an association representing both parents and teachers with a deep commitment to serve as a constructive voice for the welfare of every child, we have much to offer and stand ready to contribute.

Thank you for your consideration of our thoughts. We look forward to educational transformation that brings educators and policy makers together with parents and families for the benefit of all children.

Sincerely,



Bonnie M. Russell, President
New York State PTA
Communicate to Advocate

Cc: Merryl H. Tisch, Commissioner, NYS Board of Regents
Elizabeth Berlin, Acting Commissioner, NYSED
Members of the NYS Board of Regents
ECB partners