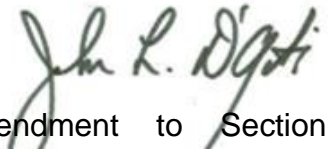






TO: The Honorable the Members of the Board of Regents

FROM: John L. D'Agati 

SUBJECT: Proposed Amendment to Section 80-1.5 of the Regulations of the Commissioner of Education Relating to the Establishment of a Multiple Measures Review Process for the edTPA

DATE: June 1, 2017

AUTHORIZATION(S):  

SUMMARY

Issue for Decision (Consent Agenda)

Should the Board of Regents amend Section 80-1.5 of the Commissioner's Regulations relating to the establishment of a multiple measures review process for the edTPA?

Reason(s) for Consideration

Review of Policy.

Proposed Handling

The proposed amendment is submitted to the Full Board for adoption as a permanent rule at its June 2017 Board of Regents meeting (Attachment A is a copy of the proposed amendment).

Procedural History

A Notice of Proposed Rule Making was published in the State Register on March 29, 2017. Supporting materials for the proposed amendment are available upon request from the Secretary to the Board of Regents.

Following the 45-day public comment period, the Department received several comments on the proposed amendment. An Assessment of Public Comment is included as Attachment B.

Background Information

New and revised certification exams were released to the field in May 2014, including the edTPA.

The edTPA, a subject-specific multi-measure performance assessment, is comprised of three tasks: (i) planning instruction and examination; (ii) instructing and engaging students in learning; and (iii) assessing student learning. It was developed by Stanford University in partnership with the American Association of Colleges for Teacher Education (AACTE).

Commencing in May 2014, a safety net for the edTPA was established - candidates who do not pass the edTPA can take and pass the Assessment of Teaching Skills – Written (ATS-W). The Board of Regents also established an edTPA Task Force which included representatives from CUNY, SUNY, clcu, the Teacher Education Advisory Group, the United University Professions, the Professional Staff Congress and P-12. The edTPA safety net (along with the other safety nets for the teacher certification exams) was extended until June 30, 2017 at the April 2016 Board of Regents meeting.

The edTPA Task Force was reconvened by request of the members of the Board of Regents in January 2016. Beginning in May 2016, the Task Force began to review the edTPA, as well as other teacher certification exams. Conversations were led by co-chairs, Dr. David Cantaffa (Assistant Provost for Educator Preparation, SUNY) and Dr. Jamie Dangler (Vice President for Academics, UUP). This work was also informed by the gathering of information across the State of New York by the Higher Education Committee chairs, Regents Cashin and Collins. Several other members of the NYS Board of Regents and the NYS Commissioner of Education participated in public forums over the past year to discuss the teacher certification exams.

Recommendations from the edTPA Task Force:

At the January 2017 Board of Regents meeting, the co-chairs of the edTPA Task Force presented their recommendations. The recommendations encompassed the edTPA as well as the other certification exams. Please see the Related Regents Items section for links to the report of the Task Force including a chart outlining the recommendations from the Task Force.

- (1) The first recommendation was for the Department to establish a standard setting committee to determine if the passing score for the edTPA should be reset and gradually phased in over several years. The Department is working with SCALE and the testing vendor to establish a timeline for implementation and convene a standard setting committee. Our goal is for the Commissioner to implement a new cut score in the fall of 2017, after a recommendation from the standard setting panel.
- (2) As a part of the first recommendation, the Task Force has asked the Department to implement a multiple measures review process in cases where there is compelling evidence that the candidate is ready to teach but did not achieve a

passing score on the edTPA. In order to request a multiple measures review, the candidate must score within one standard deviation of the passing score as established by the standard setting committee, and must demonstrate that they have the knowledge, skills, and abilities to become a teacher of record. A regulatory change is necessary to implement this process, and is recommended to the Board. Such multiple measures would include:

- Recommendation(s) from college/university faculty who have been responsible for program-level assessment of a teacher candidate's clinical practice.
- Recommendations from the teacher candidate's cooperating teacher(s).
- GPA - **must** have a GPA of 3.0 or higher in their program area, or the substantial equivalent as determined by the Commissioner.
- Have achieved a passing score on the other New York State Teacher Certification Exams (e.g., Educating All Students exam, Content Specialty Tests).
- Recommendations from faculty and cooperating teachers or other qualified individuals, as determined by the Department, that the teacher has the minimum knowledge, skills and abilities in pedagogy to enter the classroom.

A panel consisting of two P-12 teachers, two principals, two superintendents, two higher education faculty, and one NYSED staff member will review any waiver applications submitted to the Department on a periodic basis, as needed.

- (3) The Task Force requested that the Department work with SCALE and the testing vendor to release the qualifications of scorers through an annual report of de-identified individual level information, such as institution/organization affiliation, subject area and grade area, years of experience as an educator, baseline demographics, and length of time as an edTPA scorer. The Department will work with SCALE and the testing vendor to determine what level of scorer information can be released in an annual report.
- (4) The Task Force has asked the Department to work with the field, SCALE, and the testing vendor to develop and implement a process to review specific edTPA handbooks. The process would entail a review of the claims brought forth by education professionals in a specific certification area, with possible outcomes of this process as follows:
 - i. NYSED and representatives of the certification area will work with SCALE to substantively revise the applicable edTPA handbook.
 - ii. If handbook revision is not feasible for the certification area under evaluation, the Commissioner of Education may approve an alternative performance assessment for this certification area.

No regulatory change is needed to develop and implement this process, and the Department has already started having conversations with SCALE and the testing vendor to establish this review process.

- (5) The Task Force has asked the Department to convene a clinical practice work group to review the length and requirements of student teaching. The Department has invited members of P-12 and higher education to be a part of this work group. Ultimately, the work group will make recommendations to the Board of Regents to amend the current requirements. At that time, a regulation change would be needed.
- (6) The Task force recommends increasing the voucher program. While no regulation change is needed, this is a part of the Regents budget request.
- (7) The Task Force recommends that the Department work with the testing vendor to review the Educating All Students (EAS) exam. The review will focus on the constructed response items and will potentially result in revising a portion of the assessment so that it assesses both the candidate's ability to serve a diverse student body and assess the potential teacher's literacy skills.
- (8) Last, the Task Force has recommended that the Department eliminate the requirement that students must take and pass the Academic Literacy Skills Test (ALST) to become certified. As discussed in #7 (above), the Department will review the EAS assessment and potentially revise as needed to assess the potential teacher's literacy skills. The Department will present, separately, an emergency regulation at the March Board meeting to accomplish this.

Proposed Amendment

The Department recommends an amendment to Section 80-1.5 of the Regulations of the Commissioner of Education to make available, for those candidates who take the edTPA after a new passing score has been established and implemented, access to the "multiple-measures review process" if they fail to receive a passing score on the edTPA but fall within one standard deviation (as determined by the standard setting committee) below the new passing score, provided they meet additional requirements outlined in the regulations. Most important, to be eligible for this process, candidates must: (1) fall within one standard deviation below the new passing score, (2) have a minimum GPA of 3.0, and (3) pass all other exams (or available safety nets) required for the teaching certificate they are seeking. Recommendations from faculty and cooperating teachers, as well as evidence of extenuating circumstances, will be considered by the panel in addition to evidence of having met these requirements. Until such time as this new edTPA passing score is established and the multiple measures review process is implemented, the edTPA safety net will remain in effect.

Related Regents Items

<https://www.regents.nysed.gov/common/regents/files/416hea2.pdf>
<https://www.regents.nysed.gov/common/regents/files/1016hea2.pdf>
<https://www.regents.nysed.gov/common/regents/files/117hed2.pdf>
<https://www.regents.nysed.gov/common/regents/files/317hed1.pdf>

Recommendation

It is recommended that the Board of Regents take the following action:

VOTED: That Section 80-1.5 of the Regulations of the Commissioner of Education be amended, as submitted, effective June 28, 2017.

Timetable for Implementation

If adopted at the June 2017 meeting, the proposed amendment will become effective on June 28, 2017.

AMENDMENT TO THE REGULATIONS OF THE COMMISSIONER OF EDUCATION

Pursuant to sections 207, 215, 3001, 3003, 3004 and 3009 of the Education Law.

1. Subdivision (d) of section 80-1.5 of the Regulations of the Commissioner of Education shall be amended to read as follows:

(d) Multiple Measures Review Process for the edTPA.

(1) A candidate may apply for a waiver of the edTPA requirement on or after the effective date of this section through a multiple-measures review process. Provided however, that this process will only apply if and when a new standard setting panel has been convened and makes a recommendation to the Commissioner for a new passing score for the edTPA and such score has been approved by the Commissioner for use with the edTPA, and the candidate meets the requirements set forth in paragraph (2) of this subdivision.

(2) To be eligible for a waiver of the requirement for the edTPA through the multiple-measures review process, a candidate shall:

(i) receive a score within one standard deviation below the new passing score set by the standard setting panel, as determined by the Commissioner;

(2) have a cumulative grade point average of a 3.0 in his/her program area or its equivalent, as determined by the Commissioner;

(3) receive a satisfactory passing score on all other examinations (or available safety nets) required for the teaching certificate sought; and

(4) provide recommendations from faculty and cooperating teachers or other qualified individuals, as determined by the Department, that the teacher has the minimum knowledge, skills and abilities in pedagogy to enter the classroom.

(3) The Department will convene a multiple measures review panel to review waiver applications submitted pursuant to this section. Such panel shall be comprised of two P-12 teachers, two principals, two superintendents, two higher education faculty and one staff member from the Department. The decision of the majority of the members shall determine whether a candidate will receive a waiver under this subdivision and such decision shall be final.

ASSESSMENT OF PUBLIC COMMENT

Since publication of Emergency Adoption and Proposed Rule Making in the State Register on March 29, 2017, the State Education Department (SED) received the following comments on the proposed amendment:

1. COMMENT:

One commenter raised multiple concerns related to the edTPA. One concern was the cost of the assessment and how the cost can be an extreme financial burden on students. The second concern raised was that the edTPA takes away from the learning experience during student teaching. The commenter suggests that the Department address the cost of the edTPA and adjust the size of the task so that students completing the edTPA can successfully complete the exam and have a successful semester of student teaching. The commenter acknowledges the purpose of the edTPA is to ensure high quality teachers, but believes there should be alternatives for candidates.

DEPARTMENT RESPONSE:

While the cost of the edTPA has not been eliminated, one of the reasons that the ALST was eliminated as a requirement for teacher certification was to address the total cost of exams required for teacher certification. The cost of the ALST was \$118 and it is no longer required for teacher certification.

With respect to the effect the edTPA has on student teaching, the edTPA Task Force recommended that the Department convene a Task Force to review the current regulation and practice related to the length of student teaching. The first meeting of this Task Force will be held in June 2017.

2. COMMENT:

One commenter expressed concerns related to the World Languages edTPA including low pass rates for the exam, use of the multiple measures review process, strategies for maximizing use of the target language, and the desire for greater alignment of teacher work samples with ACTFL/CAEP accreditation requirements. The commenter also expressed desire and willingness to engage with NYSED further to achieve the goal of improving the effectiveness of the edTPA.

DEPARTMENT RESPONSE:

The Department is in the process of establishing an in-depth handbook review process, as recommended by the edTPA Task Force, which will be made available as soon as possible. The purpose of this process is to allow for specific edTPA handbooks to be reviewed if significant concerns are raised by the field and based on the feedback received, which may result in changes to a handbook.

The Department will continue to engage stakeholders throughout the implementation of the edTPA and in the handbook review to ensure that the voices of experts in the field are considered in this process.

3. COMMENT:

One commenter requested that the edTPA be maintained with the measures that are currently in place because as an educator they have seen significant improvements in teacher preparation as a result of the edTPA and believes that continued use will benefit K12 students.

DEPARTMENT RESPONSE:

The intent behind the regulatory changes related to the edTPA is to address significant concerns raised by the field related to the passing score of the examination. The Department agrees that the edTPA should remain a measure to assess the minimum knowledge, skills, and abilities of teachers entering the profession, but the multiple measures process will allow for those who fall within a small range below the new cut score the opportunity to show that despite a failing edTPA score, they still possess the minimum knowledge, skills and abilities to enter the classroom.

4. COMMENT:

One commenter supported the efforts of the edTPA Task Force and the proposed amendment. The commenter believes the multiple measures appeals process will offer a way for those who fail the edTPA to have a determination made based on more than just the edTPA score.

DEPARTMENT RESPONSE:

No response is necessary as the comment is supportive.

5. COMMENT:

One commenter raised concerns related to the multiple measures review process for the edTPA. One concern is that it is unclear what data (if any) is being used to support the multiple measures process. Another concern is that, if the edTPA passing score is lowered, the commenter believes there may be no reason for a waiver process to pass the edTPA. The commenter thinks that lowering the passing score and seeing how that works without the multiple measures process would be a better alternative.

Commenter also expressed concerned with the logistics of the process and how the multiple measures review process would be valid and reliable because such a

process is difficult to standardize and there is great variation in context, judgment and bias. The commenter mentions that the logistics of the process will be challenging as well. Logistical concerns raised included determining the standard deviation, what scores will be used to calculate the standard deviation, and whether the test vendor will supply a mean score to determine the standard deviation.

DEPARTMENT RESPONSE:

The standard setting committee that is charged with reviewing the edTPA passing score will have access to handbook specific pass rates on the edTPA in order to inform their decision. In addition, the committee will be charged with reviewing the passing score. Ultimately, the committee will make a recommendation to the Commissioner as to whether a new passing score should be established for the edTPA. As to the reliability and validity of the multiple measures review process, the process of having a multiple member panel review multiple measures submitted by students to determine whether or not they possess the knowledge, skills, and abilities to enter a classroom will be made as objective as possible by the panel.

The Department does not believe that this process will require additional resources on higher education institutions. Participation on the panel is voluntary.

In response to the logistical concerns raised by the commenter, as previously mentioned, the Department is currently in the process of convening a standard setting committee, which will be charged with reviewing the edTPA passing score. Based on this outcome, the Department will work with the standards setting committee to determine the appropriate score which qualifies a candidate for the multiple measures review process, including the calculation and scores used to determine the standard deviation.

6. COMMENT:

One commenter raised multiple concerns related to the edTPA. The first concern related to how overwhelming the handbook is for candidates to read, noting that it had to be read over 20 times while completing the assessment. Second, the commenter raised the concern that it is nearly impossible to complete the edTPA during a single 7 week placement, and that it is impossible to plan, teach, and assess lessons during the placement outside of work on the edTPA. Last, the fee was raised as a concern as well.

DEPARTMENT RESPONSE:

In response to the commenter's concern regarding the amount of time it takes to complete the edTPA, the edTPA handbook is meant to be used as a reference guide to candidates completing the assessment. In many cases, programs introduce the handbooks to candidates in advance of completing their edTPA, and it is meant to be embedded in the curriculum to help students become familiar with the handbooks. Used as a reference guide, similar to how a textbook is used, it is possible that a candidate may refer to the handbook several times throughout completion of the edTPA.

With respect to the effect the edTPA has on student teaching, the edTPA Task Force recommended that the Department convene a Work Group to review the current regulation and practice related to student teaching. The first meeting of this Task Force will be held in June 2017.

Lastly, at the March Board of Regents meeting, the Board voted to remove the Academic Literacy Skills Test (ALST) as a requirement for certification, and one of the reasons for this was to address the overall cost of certification exams for students in New York. While the cost of the edTPA was not directly addressed, the hope is that the removal of the ALST will help students with the financial burden.

7. COMMENT:

Commenters expressed disagreement with the regulation changes related to setting a new edTPA passing score, eliminating the ALST, and revising the EAS. Commenters point to significantly lowered expectations for students passing the Regents exams, as well as low student scores on the 3-8 New York State ELA and math exams. At least one commenter indicated that he/she is not surprised that candidates have difficulty on the edTPA, ALST, and EAS because they are not prepared by their programs adequately. Commenters recommend that the Board not provide an easy way out for teacher certification candidates by lowering the edTPA passing score, eliminating the ALST, and revising the EAS.

DEPARTMENT RESPONSE:

In response to these concerns related to lowering the passing score on the edTPA, while a standard setting committee will be charged with reviewing the edTPA passing score, their charge is not to lower the score, but to review the existing passing score using available pass/fail data relating to the examination and sample handbooks to determine if a new passing score needs to be established.

Moreover, the intent behind eliminating the ALST was not to lower the bar to enter the teaching profession or provide an easy way out for those seeking certification. The ALST was eliminated based on recommendations from the edTPA Task Force as the result of several months of work and discussions. The issues being addressed by the removal of the exam include the high costs of the certification examinations and the fact that literacy is already assessed through the other certification examinations. In

addition, literacy and writing will also be assessed through the revisions that are currently being made to the EAS.

8. COMMENT:

Several commenters supported the amendments to the Regulations related to the edTPA.

DEPARTMENT RESPONSE:

No response is necessary as the comments are in support.

9. COMMENT:

One commenter, while supportive of removing the ALST, believes that literacy and writing skills must still be assessed. The commenter points out that literacy and writing are not assessed through the edTPA, and suggests using an assessment similar to the SAT to assess literacy and writing.

DEPARTMENT RESPONSE:

The Department believes that assessing literacy and writing skills is critical and that such skills are currently assessed through the other certification examinations. In addition, the Department is also making revisions to the EAS exam to ensure that these skills are assessed. The Department is currently progressing through the test development process to complete the revised EAS exam.

10. COMMENT:

Commenters expressed concern with implementation of the edTPA and the negative consequences it has had on student teaching. Commenters explain that the edTPA “takes away from” the student teaching experience and recommends that the

edTPA not be required for certification. Other commenters expressed concern that if the edTPA requirement remains in place there will be a teacher shortage in New York.

DEPARTMENT RESPONSE:

With respect to the effect the edTPA has on student teaching, the edTPA Task Force recommended that the Department convene a Work Group to review the current regulation and practice related to student teaching. The first meeting of this Task Force will be held in June 2017.

11. COMMENT:

One commenter is supportive of the modifications related to the edTPA. As a teacher preparation educator, they have experienced situations where a candidate fails the edTPA by one point and although they have the potential to be a great teacher they must still retake the edTPA to gain certification.

DEPARTMENT RESPONSE:

No response is necessary to the extent that the comment is supportive. The regulation changes were made to address the concerns raised by the commenter. Specifically, the edTPA passing score will be reviewed, and the Department will implement a multiple measures process which will allow for those who fall within a small range below the new cut score the opportunity to show that despite a failing edTPA score, they still possess the minimum knowledge, skills and abilities to enter the classroom.

12. COMMENT:

One commenter raised concerns related to all of the certification exams. Related to the edTPA, the commenter suggested that the edTPA be simplified and should not be so costly.

DEPARTMENT RESPONSE:

See Response No. 7. In addition, while the edTPA is not being simplified by the changes, the Department is moving forward with a standard setting committee to review the edTPA passing score and ultimately recommend a new passing score to the Commissioner.

13. COMMENT:

One commenter raised concerns that the edTPA is a high-stakes exam, the \$300 cost is too burdensome for candidates, and that there are specific concerns with the World Languages edTPA handbook. The commenter recommends that the Department consider how the edTPA is implemented and whether it is the best performance assessment for New York.

DEPARTMENT RESPONSE:

While the cost of the edTPA has not been eliminated, one of the reasons that the ALST was eliminated as a requirement for teacher certification was to address the total cost of exams required for teacher certification. The cost of the ALST was \$118 and it is no longer required for teacher certification. In addition, the Department continues to make available to education programs vouchers that they can distribute to students they believe are good teaching candidates but struggle financially.

With respect to the concern related to the World Languages handbook, the Department is in the process of establishing an in-depth handbook review process, as recommended by the edTPA Task Force, which will be made available as soon as possible. The purpose of this process is to allow for specific edTPA handbooks to be reviewed if significant concerns are raised by the field and based on the feedback

received, it may result in changes to a handbook, or ultimately, use of a different performance assessment.

Last, the review of the edTPA passing score and the implementation of the multiple-measures review process is intended to address the implementation concerns raised by the commenter as well as the concern with the high-stakes nature of the exam.

14. COMMENT:

One commenter raised concern about the people who worked hard to pass the “old” NYSTCE exams and the money spent to take those exams. The commenter is concerned that there are individuals who paid to take the old exams and now have to pay to take the new exams because they did not pass all of the old exams.

DEPARTMENT RESPONSE:

Candidates applying for certification on or after May 1, 2014 or candidates who applied for certification on or before April 30, 2014 but did not meet all the requirements for an initial certificate on or before April 30, 2014, will be required to pass the new examinations. Institutions of higher education in New York were made aware of the implementation of the new certification exams beginning in December 2012. Please see Board of Regents Item from December 2012 at:

<http://www.regents.nysed.gov/common/regents/files/documents/meetings/2012Meetings/December2012/1212hea1.pdf>.

15. COMMENT:

One commenter applauded the recommendations of the Task Force. The commenter supports elimination of the ALST. However, the commenter is concerned with the edTPA and raises the concern that the edTPA takes candidates focus away from student teaching.

DEPARTMENT RESPONSE:

No comment is necessary to the extent that the comment supports removal of the ALST. In response to the concern about the edTPA and the effect on student teaching, please see response to Comment # 10 above.

16. COMMENT:

One commenter supports elimination of the ALST, revisions to the EAS, adjustment of the edTPA passing score, and establishment of the multiple measures review process. However, the commenter raises a concern with the proposal to eliminate the current short-answer constructed response items and to replace them with a reading and writing item which will assess both students' ability to teach a diverse population and their literacy skills. The commenter explains that assessing literacy within the EAS is unnecessary and inconsistent with the objectives of the exam. The commenter asks that the Board reconsider revision of the EAS. The commenter explains that the revisions to the EAS were not raised by the edTPA Task Force.

DEPARTMENT RESPONSE:

No response is necessary to the extent that the comment is supportive. In response to the concern regarding the revisions to the EAS to add a literacy component, the Department is in the process of convening test development committees to review the proposal to revise the EAS. These committees, including Framework Review, Item Review, and Bias Review, will be charged with incorporating literacy and writing skills into the current EAS exam in a way that does not compromise the current exam, but still ensures that candidates possess the requisite knowledge, skills, and abilities (including literacy and writing) to enter the profession.

17. COMMENT:

One commenter supports elimination of the ALST because literacy and writing are already assessed in many ways, and the proposal to establish a multiple-measures review process for the edTPA.

DEPARTMENT RESPONSE:

No response is necessary because the comments are supportive.

18. COMMENT:

One commenter supports elimination of the ALST but raises a concern that the edTPA is misplaced. The commenter believes the field of education is under attack, and that the higher standards demanded by CAEP and NYSED are troubling. The commenter believes the edTPA should be put under a microscope and that it would be better placed at the professional level. The commenter suggests allowing institutions the authority to get their students through college earning their degree to teach in schools.

DEPARTMENT RESPONSE:

The edTPA Task Force made the recommendations (elimination of the ALST, review of the edTPA passing score, and implementation of the multiple-measures review process for the edTPA) in response to similar concerns raised by the field regarding the high demands placed on teacher certification candidates and the field. The Task Force worked over several months to come up with recommendations that addressed these concerns while ensuring that new teachers still possess the requisite knowledge, skills, and abilities to enter the profession and ensure that every student has a competent teacher. The recommendation to eliminate the ALST was proposed to address factors such as cost as well as the idea that literacy and writing are assessed

throughout a candidate's education program. The review of the edTPA passing score is in progress by the Department, as well as establishment of the multiple-measures review process for the edTPA and the in-depth handbook review process.

19. COMMENT:

One commenter raised the concern that the current EAS exam is not appropriate for trade and technical teachers because given the current course requirements for their initial certification, they will not have the background knowledge to accommodate special needs learners.

DEPARTMENT RESPONSE:

At the May 2017 Board of Regents meeting, the Department proposed a regulation change that eliminates the EAS requirement for Career and Technical Education (CTE) teachers pursuing an Initial certificate and instead proposes to make this a requirement to obtain a Professional CTE certificate. Please see Board of Regents Item at: <https://www.regents.nysed.gov/common/regents/files/517hea1.pdf>. After expiration of the 45-day public comment period, it is anticipated that the Board will permanently adopt this change at its September 2017 meeting and that it will become an effective rule on September 27, 2017.

20. COMMENT:

One commenter fully supported elimination of the ALST but does not approve of the multiple measures review process for the edTPA and believes those who fail the edTPA should re-take the exam.

DEPARTMENT RESPONSE:

No response is necessary to the extent that the comment is in support of removal of the ALST. In response to the concern regarding the multiple-measures review process for the edTPA, it should be noted that this option will not be available for all candidates who fail the edTPA but only those who fall within one standard deviation below the new passing score once recommended by an edTPA standard setting panel to the Commissioner. Therefore, this will only be available to those candidates who receive scores approximately 1-3 points below the new passing score (depending on what the new passing score is).

21. COMMENT:

Commenters fully supported elimination of the ALST but believe the edTPA is misplaced and instead should be used to determine if teachers can make tenure in their full time teaching positions and/or earning a master's degree and should not be required for certification.

DEPARTMENT RESPONSE:

The examination has been validated for State certification purposes. Moreover, the Department believes that all teachers should have minimum knowledge, skills and abilities in pedagogy, not just tenured teachers or teachers who wish to obtain their master's degree. Teachers could be in the classroom for years before obtaining tenure and/or their master's degree without demonstrating these minimum pedagogical skills. Therefore, the Department believes no changes are needed.

22. COMMENT:

One commenter requests that programs that have attained or are seeking accreditation through ACTFL-CAEP (formerly NCATE) National Recognition be allowed to opt out of edTPA World Languages.

RESPONSE: The Department believes that there should be minimum certification standards for teaching candidates in all programs across the State. See also Response to #2.

23. COMMENT:

One commenter expressed concern about the diversity of the edTPA multiple measures because New York is a large and geographically diverse state, and it will be difficult to convene a panel that can adequately reflect the diversity.

RESPONSE

The Department will make every effort to ensure that the panel represents the geographic diversity of the State.