



**TO:** The Honorable Members of the Board of Regents

**FROM:** William P. Murphy *William Murphy*

**SUBJECT:** Proposed Amendments of Sections 52.21 and 80-5.24 of the Regulations of the Commissioner of Education Relating to Establishing Registration Requirements for Residency Programs and Revising Residency Certificate Requirements

**DATE:** June 30, 2022

**AUTHORIZATION(S):** *Don McG* *Bellotti*

#### **SUMMARY**

#### **Issue for Decision (Consent)**

Should the Board of Regents adopt the proposed amendments of sections 52.21 and 80-5.24 of the Regulations of the Commissioner of Education relating to establishing registration requirements for residency programs and revising the Residency certificate requirements?

#### **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 July 2022 meeting. A copy of the proposed amendment is attached (Attachment A).

#### **Procedural History**

The proposed amendment was presented to the Higher Education Committee for discussion at its April 2022 meeting. A Notice of Proposed Rule Making was published in the State Register on April 27, 2022, for a 60-day public comment period. Following publication in the State Register, the Department received four comments on the proposed amendment. An Assessment of Public Comment is included (Attachment B). No changes to the proposed amendment are recommended at this time. A Notice of

Adoption will be published in the State Register on July 27, 2022. Supporting materials are available upon request from the Secretary to the Board of Regents.

### **Background Information**

At its July 2017 meeting, the Board of Regents established the Residency certificate for candidates in the Classroom Academy Residency Pilot Program. The State University of New York College at Plattsburgh - Queensbury campus and the Cambridge, Hudson Falls, and Washington-Saratoga-Warren-Hamilton-Essex (WSWHE) County BOCES consortia partnered to create this program. It includes a two-year, full-time residency where candidates were employed by the WSWHE BOCES and placed in a partner school district at the beginning of their graduate program. These candidates needed a new type of certificate to work in the school district because they did not qualify for an internship certificate, which requires candidates to have completed at least one-half of the semester hour requirement for their program (8 NYCRR 80-5.9).

There is a growing interest in residencies by New York State teacher preparation programs and school districts as well as nationally. For example, two additional institutions of higher education have joined the pilot program, enabling their candidates to be eligible for the Residency certificate. Additional teacher preparation programs have expressed an interest in developing other residency models that could also lead to a Residency certificate.

In response to this increased interest in residencies, the Department is proposing to establish registration requirements for residency programs in section 52.21 of the Commissioner's regulations. The registration requirements provide programs with the flexibility to create their own residency models while setting consistent standards for residencies in teacher preparation programs across New York State. The standards will also provide consistency for state and federal funding purposes.

The proposed amendments outline the registration requirements for teacher preparation programs that choose to include a residency in their program in lieu of a student teaching, practicum, or similar clinical experience. If the proposal is approved, only teacher preparation programs that are registered as residency programs would be able to state that their program includes a residency or that they are a residency program.

The Department also proposes to amend the Residency certificate requirements in section 80-5.24 of the Commissioner's regulations such that candidates who are enrolled in a New York State registered teacher preparation program which includes a residency, based on the proposed standards, would be eligible for the certificate. This revision expands the pool of candidates who are eligible for the Residency certificate. However, candidates who enroll in a residency program would not be required to obtain the Residency certificate unless they are employed by a school, school district, or BOCES.

## **Proposed Amendments**

### *Registered Residency Programs:*

The Department proposes the following definition of a residency in a New York State registered teacher preparation program:

*Residency* means a structured, college-supervised learning experience for a candidate in a teacher education program that is designed and implemented through a memorandum of understanding or similar collaborative agreement between an institution of higher education and an educational setting where the partners design the residency to provide candidates with instructional experiences connected to program learning goals and district priorities and develop shared expectations for the candidate's gradual assumption of responsibilities in their placement in the area of the certificate sought. Candidates complete pedagogical coursework during the residency and practice under the direct supervision of the certified school-based teacher.

The proposed registration requirements for residency programs state that a residency must be at least one academic year in length and include at least 1,000 hours of clinical experiences for candidates, enabling them to experience the full range of a teacher's annual responsibilities, in alignment with the daily schedule and annual calendar of the educational setting. A certified school-based teacher, possessing the certificate(s) sought by the candidate, will have official responsibility for the class during the residency placement(s) for the certificate(s) sought. Candidates who pursue more than one certificate title may complete placements of at least 250 hours (roughly seven weeks) for each additional certificate title within the 1,000 or more total hours.

The proposed registration requirements for residency programs reflect several of the student teaching and practica requirements for candidates who enroll in a program beginning in Fall 2023. These include at least 15 hours with a focus on understanding the needs of students with disabilities; clinical experiences meeting specific requirements and addressing the full range of student developmental levels required by the certificate(s) sought; and satisfaction of the requirements for university-based teacher educators and school based-teacher educators.

### *Residency Certificate:*

For the Residency certificate, candidates will need a recommendation for certification from the institution of higher education and an employment and support commitment from the partnering school, school district, or BOCES. The proposed amendment clarifies that this certificate authorizes a candidate to work only in the school, school district, or BOCES for which a commitment for employment and support has been made. Candidates cannot be the teacher of record during their employment, allowing them to focus on their coursework and professional growth.

The Residency certificate is currently valid for three years or less if the candidate successfully completes or exits the residency program in less than three years. This presents a problem if candidates complete the residency program, and their Residency certificate expires while they are still employed. Therefore, the proposed amendment provides that if a candidate successfully completes the program in less than three years, the expiration date of the certificate shall be three months after the date of the institutional recommendation for the Initial or Professional certificate in the subject area of the certificate sought. For example, candidates who complete their program in May would have their Residency certificate expire three months later in August, allowing them an opportunity to remain continuously certified during their employment. Candidates who exit the program would have their certificate expire on the date of their departure.

Currently, upon successful completion of the residency program, candidates who hold the Residency certificate can be credited up to one year of the residency towards the Professional certificate experience requirement. This amount of experience was based on the length of the two-year Classroom Academy Residency Pilot Program. Since the proposal would allow candidates in any registered residency program to obtain the Residency certificate, the Department proposes to revise the type of experience that could count from up to one year to any amount of residency experience, provided that the experience is co-teaching experience.

#### *Additional Amendments:*

Since the clinically rich graduate-level teacher preparation pilot program ended on October 1, 2016, the proposed amendment removes the pilot program from section 52.21 of the Commissioner's regulations. These regulations refer to an "intensive residency component" that may be confusing given the proposed definition of a residency.

The definition of clinical experiences in section 52.21 of the Commissioner's regulations is also amended to include residencies. Several other provisions in such section are updated to include "residencies" or replace "field experiences, student teaching, and/or practica" with "clinical experiences" broadly, which will now include residencies, in order for the regulations to apply to registered residency programs.

#### **Related Regents Items**

April 2022: [Proposed Amendments of Sections 52.21 and 80-5.24 of the Regulations of the Commissioner of Education Relating to Establishing Registration Requirements for Residency Programs and Revising Residency Certificate Requirements](http://www.regents.nysed.gov/common/regents/files/422hed1.pdf)  
(<http://www.regents.nysed.gov/common/regents/files/422hed1.pdf>)

December 2021: [Proposed Amendment to Sections 52.21, 80-1.5, 80-3.3, 80- 3.4, 80-5.8, and 80-5.17 of the Regulations of the Commissioner of Education Relating to the Teacher Performance Assessment Requirement for Certification and Establishing a](#)

[Teacher Performance Assessment Requirement for Registered Teacher Preparation Programs](#)

(<https://www.regents.nysed.gov/common/regents/files/1221hed3.pdf>)

June 2021: [Proposed Amendment to Sections 52.21, 80-3.14, and 80-3.7 of the Regulations of the Commissioner of Education and Section 30-1.2 of the Rules of the Board of Regents Relating to Providing Flexibility Relating to Student Teaching, Individual Evaluation Pathway to Certification, Accreditation, and the Computer Science Tenure Area and Statement of Continued Eligibility in Response to the COVID-19 Crisis](#)  
(<http://www.regents.nysed.gov/common/regents/files/621brca8.pdf>)

April 2019: [Proposed Amendments to Sections 52.21 and 80-3.7 of the Regulations of the Commissioner of Education Relating to Student Teaching Requirements for Teacher Certification and the Registration of Teacher Preparation Programs](#)  
(<http://www.regents.nysed.gov/common/regents/files/419hea2.pdf>)

July 2017: [Proposed Amendment to Add a New Section 80-5.23 to the Regulations of the Commissioner of Education to Establish a Residency Certificate for Students Enrolled in a Classroom Academy Residency Pilot Program](#)  
(<http://www.regents.nysed.gov/common/regents/files/717brca6.pdf>)

**Recommendation**

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

VOTED: That sections 52.21 and 80-5.24 of the Regulations of the Commissioner of Education be amended, as submitted, effective July 27, 2022.

**Timetable for Implementation**

If adopted at the July meeting, the proposed amendment will become effective on July 27, 2022.

## Attachment A

### AMENDMENT TO THE REGULATIONS OF THE COMMISSIONER OF EDUCATION

Pursuant to sections 101, 207, 208, 305, 308, 3001, 3004, and 3009 of the Education Law.

1. Subparagraph (iii) of paragraph (1) of subdivision (b) of section 52.21 of the Regulations of the Commissioner of Education is amended to read as follows:

(iii) *Clinical experience* means an experience where candidates work in educational settings, or with community-based organizations, when appropriate, and engage in the pedagogical work of the profession of teaching, closely integrated with educator preparation coursework and supported by partnering institutions. *Clinical experiences* may include but are not limited to field experience placements, student teaching, practica, residencies, and limited virtual and/or simulated experiences.

2. Subparagraphs (xv) through subparagraph (xxi) of paragraph (1) of subdivision (b) of section 52.21 of the Regulations of the Commissioner of Education are re-lettered subparagraphs (xvi) through (xxii) and a new subparagraph (xv) is added to read as follows:

(xv) Residency means a structured, college-supervised learning experience for a candidate in a teacher education program that is designed and implemented through a memorandum of understanding or similar collaborative agreement between an institution of higher education and an educational setting where the partners design the residency to provide candidates with instructional experiences connected to program learning goals and district priorities and develop shared expectations for the candidate's gradual assumption of responsibilities in their placement in the area of the certificate

sought. Candidates complete pedagogical coursework during the residency and practice under the direct supervision of the certified school-based teacher.

3. Subclause (2) of clause (c) of subparagraph (ii) of paragraph (2) of subdivision (b) of section 52.21 of the Regulations of the Commissioner of Education shall be amended to read as follows:

(2) [Field experiences, student teaching, and practica]Clinical experiences.

(i) For registered programs with students who first enroll prior to the Fall 2023 semester that include student teaching or practica:

(A) [All registered programs]Programs shall include at least 100 clock hours of field experiences related to coursework prior to student teaching or practica. The program shall include:(B) ...

(ii) For registered programs with students who first enroll for the Fall 2023 semester and thereafter that include student teaching or practica:

(A) [All registered programs]Programs shall include at least 100 clock hours of field experiences related to coursework prior to student teaching or practica, provided that at least 15 of the 100 clock hours of field experiences shall include a focus on understanding the needs of students with disabilities.

(B) ...

(C) ...

(D) ...

(E) ...

(iii) For registered residency programs:

(A) General requirements for residency programs.

(I) The residency program shall include a residency of at least one academic year in length that includes at least 1,000 hours of clinical experiences for candidates which shall enable candidates to experience the full range of a teacher's annual responsibilities, in alignment with the daily schedule and annual calendar of that educational setting; provided that candidates pursuing more than one certificate title may complete placements of at least 250 hours for each additional certificate title within the 1,000 or more total hours.

(II) The residency program shall include at least 15 hours of clinical experiences that shall include a focus on understanding the needs of students with disabilities.

(III) The certified school-based teacher shall have official responsibility for the class during the residency placement(s) for the certificate(s) sought.

(IV) The residency must address each of the applicable general and program-specific pedagogical core requirements for the program(s).

(V) The residency must be designed to provide candidates with opportunities to practice teaching skills identified in the New York State Teaching Standards in an educational setting in the subject area and grade level of the certificate title(s) sought, co-supervised by a university-based teacher educator and a certified school-based teacher educator.

(VI) For the residency, the candidate shall be credited with at least the number of semester hours required to obtain full-time status at the institution.

(B) Residency program clinical experience. The combination of clinical experiences must:

(I) meet or exceed the specific requirements for the certificate title(s) as described in paragraph (3) of this subdivision; and

(II) address the full range of student developmental levels required by the certificate title(s) sought, as prescribed in paragraph (3) of this subdivision.

(C) Requirements for university-based teacher educators and school-based teacher educators.

(I) University-based teacher educators engaged in clinical supervision shall:

(1) be involved in program development as appropriate; and

(2) have at least 3 years of full-time teaching or related experience in any grade, pre-kindergarten through 12.

(II) School-based teacher educators who work with candidates during the residency shall:

(1) be certified in the subject area of certification sought by the teacher candidate or in a related area; and

(2) have at least three years of full-time teaching experience or the equivalent, in an educational setting, in the subject area of certification sought by the teacher candidate or in a related area; and

(3) be designated by the school or district as a school-based teacher educator, or be rated effective or highly effective in their most recent annual professional performance review or other evaluation conducted pursuant to section 3012-d of the Education Law or other applicable law and regulation, or hold a national board certificate.

(III) School-based and university-based teacher educators who work with candidates during the residency shall participate in professional learning that focuses on the provision of effective clinical supervision. Such professional learning shall be designed and/or implemented by the partnership described in clause (i)(f) of this paragraph.

[(iii)](iv) The [field experiences, student teaching, and practica]clinical experiences shall:

(A) ...

(B) ...

(C) provide candidates with experiences in a variety of communities and across the range of student developmental levels of the certificate, experiences practicing skills for interacting with parents or caregivers, experiences in high-need schools, and experiences with each of the following student populations: socioeconomically disadvantaged students, students who are English language learners, and students with disabilities; [and]

(D) for programs preparing candidates for more than one certificate, ensure that candidates have field experiences and/or student-teaching or practica experiences related to each certificate, as prescribed in paragraph (3) of this subdivision; and

(E) effective September 1, 2023, include a teacher performance assessment for candidates seeking their first initial teaching certificate that shall be integrated into the candidates' student teaching, practicum, or similar clinical experience and designed to promote candidates' professional growth.

[(iv)](v) Upon written application by the institution, the commissioner may grant a time-limited approval for an alternate model for clinical experiences, field experiences, and college-supervised student teaching, residencies, or practica, as applicable, provided that the institution adequately demonstrates the success or potential success of such model, including through the use of research.

[(v)](vi) In the case of alternate models that include college-supervised student teaching, residencies, or clinical experiences conducted when a candidate is employed by a school district or BOCES under a pre-professional teaching assistant certificate pursuant to Part 80 of this Title, the institution and employing school district or BOCES will provide candidate(s) holding such certificate with the same and/or similar student teaching or clinical experience as required under this section while employed at the school district or BOCES. No approval from the commissioner is required for such alternate models nor shall they be time limited.

[(vi)](vii) Other options for candidates holding another classroom teaching certificate to meet the student teaching, residency, or practica requirement are set forth in the teacher certification requirements of this Title for the particular certificate title.

3. Paragraph (5) of subdivision (b) of section 52.21 of the Regulations of the Commissioner of Education is REPEALED.

4. Section 80-5.24 of the Regulations of the Commissioner of Education is amended to read as follows:

(a) A [student]candidate who is enrolled in [the classroom academy residency pilot program, a pilot of a registered and approved teacher education program] a registered residency program pursuant to section 52.21 of this Title, may, upon

submission of an application with a recommendation by the partnering institution of higher education and a recommendation by the partnering school, school district, or board of cooperative educational services, receive a residency certificate under this section.

(b) This certificate shall only be issued to candidates [enrolled in a classroom academy residency pilot program, as approved by the department, and who receive an assurance]who submit satisfactory evidence of having a commitment from the partnering school, school district, or board of cooperative educational services of [that the resident has an] employment [commitment] for the length of the residency program and a plan for providing mentoring and instructional support to the [residency] candidate[ that is acceptable to the department].

(c) General requirements.

(1) Time validity. The certificate shall be valid for no more than three years from its effective date; provided, however, the certificate shall have an earlier expiration date if [one of the following conditions occurs: the resident] the candidate successfully completes the residency program, as determined by the partnering institution of higher education; or [the resident] exits the program, as determined by the partnering higher education institution[;]. If such earlier expiration date occurs for a candidate who successfully completes the program, the expiration date shall be three months after the date of the institutional recommendation for the initial or professional certificate in the subject area of the certificate sought.

(2) Limitations. The certificate shall not be renewable. The certificate shall authorize a candidate to work only in a school, school district, or board of cooperative

educational services for which a commitment for employment and mentoring has been made. The candidate shall not be the teacher of record.

(3) For [individuals]candidates called to active duty in the Armed Forces, the validity period of the residency certificate may be extended for the time of active service and an additional 12 months from the end of such service, provided that the holder is a [student]candidate in a registered [or approved graduate program of teacher education]residency program pursuant to section 52.21 of this Title.

(d) Upon successful completion of the residency program, as determined by the partnering higher education institution and partnering school, school district, or board of cooperative educational services, [up to one year of]co-teaching experience during the residency experience may be credited toward the experience required for the [student's]candidate's professional teaching certificate; provided that such experience meets the requirements set forth in section 80-3.4 of this Part.

ASSESSMENT OF PUBLIC COMMENT

Since publication of the Notice of Proposed Rule Making in the State Register on April 27, 2022, the State Education Department (Department) received the following comment on the proposed amendment:

1. COMMENT: A commenter strongly supports the proposed regulatory amendments and states that advancing regulatory amendments that formalize a residency pathway, laying out the minimum thresholds required for programs to register as teacher residencies, while simultaneously expanding access to a residency certificate so that candidates enrolled in the full-time clinical experiences required within a residency program can be compensated for their work, will put New York State on a path to a systemic solution to ensuring all aspiring teachers can access the kind of quality preparation experiences that will enable them to succeed in their chosen career. The commenter provided some of the research-based background that highlights the importance of the kind of regulatory adjustments that the Department is proposing and applauded the way in which the proposed amendments will spur innovation rather than force programs to adopt residency models.

DEPARTMENT RESPONSE: The comment is supportive of the proposed rule; therefore, no changes are necessary.

2. COMMENT: A commenter enthusiastically supports the creation of a unified definition of teacher residencies and views the potential of this regulation to positively impact teachers and students throughout the state. The commenter notes that the Teacher Quality Partnership (TQP) grant that is offered by the U.S. Department of

Education provides a rigorous definition of teacher residencies and the enactment of these programs also offers lessons and insights that could be invaluable in defining teacher residencies within the state. The commenter encourages New York State to incorporate the key characteristics of strong residencies outlined by the Learning Policy Institute in the development of the state definition and thoughtful consideration of existing definitions in an effort to maintain the spirit and intent of this model of teacher preparation. The commenter also encourages flexibility to ensure that the institution of higher education, local district, and partnering schools are able to work responsively and in harmony while attending to the basic guidelines of a residency and presented the following questions and recommendations:

- a. Clarify the difference between co-teacher, certified school-based teacher, teacher of record, and mentor.
- b. What does it mean to “be designated by the school or district as a school-based teacher educator”? Are there requirements?
- c. Modify the 1,000-clock hour clinical requirement to instead state a full-academic year residency alongside an expert Mentor Teacher.
- d. The requirement of 15 hours of clinical experience with students with disabilities is not nearly sufficient for full preparation.
- e. If a residency was designed using the guidelines of the federal TQP initiative, can those programs’ applications be streamlined to modify or not require re-registration in a seamless process with NYSED? Such residencies can leverage their federal funding with this new state funding.

- f. How will registered residencies engage with the new funding? Will the funding be used for approved residencies or for those engaging in residency certification?

DEPARTMENT RESPONSE: The proposed definition of a residency is grounded in recommendations and feedback from the New York State P-20 Collaborative. The Collaborative includes school district personnel and teacher preparation program faculty and administrators in the City University of New York (CUNY), Commission on Independent Colleges and Universities (CICU), and State University of New York (SUNY) institutions of higher education. Since the definition reflects the input and interests of key stakeholders, the Department considered but will not be revising the proposed residency definition as suggested by the commenter.

In response to the commenter's questions and suggestions:

- a. The definition and requirements for "school-based teacher educators" and "mentoring teachers" are provided in section 52.21 of the Commissioner's regulations and such section does not use or define the term "co-teacher" for clinical experience purposes. As such, the Department will not be providing guidance on this term. Further, the Department and Commissioner consider a teacher of record to be a teacher who is primarily and directly responsible for a student's learning activities that are aligned to the performance measures of a course pursuant to section 30-3.2(r) of the Rules of the Board of Regents and as reflected in various guidance documents already issued.
- b. In the proposal, school-based teacher educators must be "be designated by the school or district as a school-based teacher educator." This phrase refers

- to the school or district identifying school-based teacher educators who will work with candidates. The Department will not be outlining requirements for schools and districts related to the designation of school-based teacher educators beyond the proposed regulatory amendments.
- c. The proposed regulatory amendment states that “the residency program shall include a residency of at least one academic year in length that includes at least 1,000 hours of clinical experiences.” The requirement ensures that candidates complete a residency that is at least one academic year in length while providing guidelines and flexibility for candidates, residency programs, and schools/districts regarding the amount of time during the academic year (at least 1,000 hours). Additionally, candidates must “practice under the direct supervision of the certified school-based teacher” in the proposal.
  - d. Currently, candidates in registered teacher preparation programs must complete 15 clock hours of field experience that focuses on understanding the needs of students with disabilities according to section 52.21 of the Commissioner’s regulations. The proposal includes this same requirement for consistency.
  - e. Institutions must apply to register a residency program in order for the Department to determine if the program meets the registration requirements outlined in the Commissioner’s regulations. Residency programs that are designed using the guidelines in the federal TQP initiative may or may not be consistent with the registration requirements.

- f. The Department is not directly involved with the funding of residencies for registered teacher preparation programs at this time and, while the Department supports funding of such programs, it , therefore, is not able to answer questions related to funding.

Thus, no changes to the proposed rule are necessary.

3. COMMENT: Commenter is heartened by the decision of the Department to develop requirements for residencies to help bring attention to this important model and appreciates the important intention underlying the development to “provide programs the flexibility to create their own residency models while setting consistent standards for residencies in teacher preparation programs across New York State”. They note that such flexibility is especially important for programs that prepare candidates for different grade levels and subject areas as well as candidates in particular cities or districts. They offer two recommendations that they state are important to the design of their residency program, allowing them to provide the best learning experiences for candidates while taking into account the distinctive features of the contexts the cities and school districts within which they work and the science teacher workforce from their perspective.

The commenter points out that the proposal requires school-based teacher educators to be certified in the subject area in which the candidate is seeking certification and that this requirement will be difficult to implement for programs preparing teachers in secondary science. They explain that their program prepares teachers for Earth Science certification, but there are not enough earth science mentors to ensure they have an earth science placement in both semesters. They also share that, while there is a growing body of research that examines characteristics of school-

based mentors, the findings are still limited, focusing upon mentors' instructional ratings or other characteristics. The commenter, therefore, recommends a broader framing of this certification requirement, especially for secondary science education programs, to enable programs to place candidates with a science teacher who will be a strong mentor and ensure that candidates have quality preparation.

The commenter also states that the proposal appears to suggest that a residency is a single placement over the course of a full academic year and might not include two different classroom settings. They describe that their program prepares candidates to teach at the middle school and high school levels and that ensuring their candidates experience two different clinical settings (usually one in middle school and one in high school) is critical. They share that two settings enable candidates to gain experience for positions in which they may be hired and research finds that experiencing two settings offers multiple learning benefits for candidates. As such, the commenter recommends a framing of the residency definition that explicitly allows for multiple settings during the academic year would enable their program (and programs like theirs) to provide varied settings important for teachers who may teach multiple age ranges and/or at different school levels.

**DEPARTMENT RESPONSE:** In the proposed regulatory amendment, school-based teacher educators must “be certified in the subject area of certification sought by the teacher candidate or in a related area”, providing some flexibility in the certification of the school-based teacher educator. Additionally, the certified school-based teacher has official responsibility for the class during the residency placement(s) for the certificate(s) sought. This requirement is consistent with the definition of student

teaching in section 52.21 of the Commissioner's regulations, where student teachers engage in experiences in "a class of students in the area of the certificate sought." Requiring residency placement(s) in the subject area of the certificate sought provides candidates with real-world experiences that prepare them for their future classroom and is consistent with current regulations.

The proposed regulatory amendment does not preclude multiple settings during the residency. Therefore, no changes to the proposed rule are necessary.

4. COMMENT: A commenter strongly believes that high-quality, supported residency experiences are critical for new teacher readiness. They point out that one implication of the proposed length of the residency (at least one academic year in length that includes at least 1,000 hours of clinical experiences for candidates) is that it could compromise and create barriers for residency-like work that has demonstrated strong outcomes for students in the past. They highlight a clinical experience model that is five-months, full-time, and includes over 500 hours of clinical experiences and state that data from over 10 years of implementation of this model indicate that participants are more diverse than candidates from other models, are as effective as first-year teachers from other pathways, and are retained, on average, for a similar length of time.

The commenter is concerned that this clinical experience model will not be able to retain the "residency" component in its name, which they believe will have an impact on their recruitment and hiring efforts. They state that this might split the pipeline in a way that is not supportive for their future teachers or students, or for principals who have depended on this existing model to fill vacancies for over 10 years. They understand that the proposed residency program requirements and related definitions

will guide state and federal funding and hope that the State will consider a broader definition that maintains the critical components of a residency with some flexibility around the length of experience, or will consider how to ensure state and federal funding will foster innovation and effective programming across pathways.

DEPARTMENT RESPONSE: The Department recognizes that registered teacher preparation programs currently include a variety of valuable clinical experience models, some of which have been characterized as “residencies.” The proposed residency requirements are purposefully designed to be different from the current models of clinical experiences described in the Commissioner’s regulations, thus distinguishing residency programs in the future. For example, the proposed length of the residency is at least one academic year in length and includes at least 1,000 hours of clinical experiences, which enables candidates to experience working in a classroom during different periods of time throughout the year (e.g., beginning, end) and engaging in the full continuum of planning, instruction, and assessment over the course of a year.

Registered teacher preparation programs are not required to include a residency in their program; they can continue to have a student teaching, practicum, or similar clinical experience. However, only teacher preparation programs that meet the residency requirements and register a residency program would be able to state that their program includes a residency or that they are a residency program. This practice ensures that the term “residency” is used consistently in New York State, preventing confusion for candidates and programs. Therefore, no changes to the proposed rule are necessary.

