



TO: The Honorable Members of the Board of Regents

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

SUBJECT: Proposed Amendment of Sections 52.21 and 80-3.7 of the Regulations of the Commissioner of Education Relating to the Content Core Requirement for Additional Teaching Certificates in Certain Areas

DATE: March 27, 2025

AUTHORIZATION(S): *Dom N. B.* *Betty M.*

SUMMARY

Issue for Decision (Consent)

Should the Board of Regents adopt the proposed amendment of sections 52.21 and 80-3.7 of the Regulations of the Commissioner of Education relating to the content core requirement for additional teaching certificates in certain areas?

Reason for Consideration

Review of policy.

Proposed Handling

The proposed amendment is submitted to the Full Board for adoption as a permanent rule at the April 2025 Regents meeting. A copy of the proposed rule (Attachment A) is included.

Procedural History

The proposed amendment was presented to the Higher Education Committee for discussion at the December 2024 meeting of the Board of Regents. A Notice of Proposed Rule Making was published in the State Register on December 24, 2024, for a 60-day public comment period.

Following publication in the State Register, the Department received more than 200 comments on the proposed amendment. An Assessment of Public Comment (Attachment B) is included. No changes to the proposed amendment are recommended at this time.

If adopted at the April 2025 meeting, a Notice of Adoption will be published in the State Register on April 23, 2025. Supporting materials are available upon request to the Secretary of the Board of Regents.

Background Information

Most registered teacher preparation programs require candidates to complete coursework in a content core, which is a major or its equivalent of at least 30 semester hours in the subject area(s) of the certificate sought. At its June 2022 meeting, the Board of Regents revised the content core requirement for registered science teacher preparation programs to allow candidates who already hold a science certificate (Biology, Chemistry, Earth Science, or Physics), or are simultaneously preparing for two or more science certificates, to complete only 18 semester hours in the subject area(s) of the additional science certificate(s).

For candidates who hold a science certificate and seek an additional science certificate through the individual evaluation pathway, the content core requirement was also reduced from 30 to 18 semester hours in the subject area of the additional science certificate. The goal of these changes to teacher preparation programs and the individual evaluation pathway to certification was to address the shortage of science teachers by potentially decreasing the cost and time to earn additional science certificates.

Proposed Amendment

The proposed amendment expands on the above changes to the content core requirement described to allow candidates who seek one or more additional teaching certificates in the following areas (either through a registered teacher preparation program or the individual evaluation pathway to certification) to complete 18 semester hours of study for the content core in the subject area(s) of such additional certificate(s), rather than 30 semester hours:

- **Middle childhood education (grades 5-9):** biology, chemistry, earth science, English language arts, mathematics, social studies, physics, or a world language other than English.
- **Adolescence education (grades 7-12):** biology, chemistry, earth science, English language arts, mathematics, social studies, physics, or a world language other than English.
- **Special subject areas (all grades)** that require 30 semester hours (a major or its equivalent) for the content core requirements: dance, family and consumer sciences, health education, music, physical education, technology education, theater, and visual arts.
- **Other subject areas:** agriculture (all grades) and business and marketing (all grades).

Teacher Preparation Programs

For candidates who hold a classroom teaching certificate, other than a certificate in a specific career and technical subject (grades 7-12), and are seeking one or more additional classroom teaching certificates in a registered teacher preparation program in a subject area listed above, the Department proposes to amend section 52.21 of the Commissioner's regulations to provide that the program must require 18 semester hours of study for the content core in the subject area(s) of such additional certificate(s) rather than 30 semester hours.¹

Similarly, for candidates who are simultaneously preparing for two or more classroom teaching certificates, other than a certificate in a specific career and technical subject (grades 7-12), the program must require a major or the equivalent for the content core in the subject area of one certificate and 18 semester hours of study for the content core in the subject area(s) of the additional certificate(s) in one or more of the subject areas listed above rather than 30 semester hours.

For candidates who are enrolled in an alternative classroom teacher certification program (Transitional B program) and are simultaneously preparing for two or more classroom teaching certificates, the Department proposes that the program require: (1) an undergraduate or graduate major in the subject area of one certificate, or an undergraduate or graduate major in a related field approved by the Department; and (2) 18 semester hours of study in the subject area(s) of the additional certificate(s) in adolescence education, agriculture (all grades), business and marketing (all grades), middle childhood education specialist, and/or a special subject other than computer science (which has a content core of 12 semester hours).²

The proposed amendment would enable current and future candidates to more easily complete two or more teacher preparation programs (e.g., double major). Additionally, the proposed amendment would give institutions of higher education more flexibility to register programs that lead to certification in two or more subject areas, where one of the programs is in an area listed above. Candidates could pursue programs in related areas (e.g., biology and chemistry) and unrelated areas (e.g., mathematics and Spanish; childhood education and visual arts), giving them flexibility to pursue their talents and interests.

Candidates who pursue an additional certificate in a subject area listed above would need to complete all program requirements, including the pedagogical core and 18-semester hour content core requirements. Further, if candidates choose to seek certification in such subject area, they need to pass the required content knowledge certification examination test to demonstrate their subject matter knowledge in the area.

¹ Currently, the content core in social studies middle childhood education and adolescence education programs includes study in economics, government, and at least a total of 21 semester hours of study in the history and geography of the United States and the world. Under the proposed amendment, the 18-semester hour content core requirement for additional social studies certificates in these programs must also include study in economics, government, and history and geography of the United States and the world.

² The 18 semester hours of study for additional social studies certificates must include study in economics, government, and history and geography of the United States and the world.

Individual Evaluation Pathway to Certification

The Department proposes to amend section 80-3.7 of the Commissioner's regulations to provide that candidates who hold one or more Initial, Permanent, or Professional teaching certificates, other than a certificate in a specific career and technical subject (grades 7-12), and are seeking an additional certificate in one of the subject areas listed above through the individual evaluation pathway must complete 18 semester hours of coursework for the content core in the subject area of such additional certificate sought rather than 30 hours.³

Candidates who seek an additional certificate in a subject area listed above through the individual evaluation pathway would need to satisfy all requirements for certification, including the examination, pedagogical core (e.g., developmental level coursework), and 18-semester hour content core requirements.

Technical Amendments

At its January 2023 meeting, the Board of Regents repealed section 80-3.7(a)(3)(ii)(c) of the Commissioner's regulations. This provision described the former requirements for the individual evaluation pathway for certification for candidates with a graduate degree in science, technology, engineering, or mathematics and two years of post-secondary teaching experience in the certificate area to be taught or in a closely related subject area acceptable to the Department. The Department is proposing technical amendments to conform to this permanent rule, including the removal of references to this provision in section 80-3.7.

The proposed amendment also contains non-substantive technical amendments that update sections 52.21 and 80-3.7 to make the regulations current and consistent.

Related Regents Items

[December 2024: Proposed Amendment of Sections 52.21 and 80-3.7 of the Regulations of the Commissioner of Education Relating to the Content Core Requirement for Additional Teaching Certificates in Certain Areas](https://www.regents.nysed.gov/sites/regents/files/1224hed1.pdf)
(<https://www.regents.nysed.gov/sites/regents/files/1224hed1.pdf>)

[January 2023: Proposed Amendment of Sections 80-3.7 and 80-5.22 of the Regulations of the Commissioner of Education Relating to the Degree and Experience Requirements for College Professors for the Transitional G Certificate and Through the Individual Evaluation Pathway to Certification](https://www.regents.nysed.gov/sites/regents/files/123brca4.pdf)
(<https://www.regents.nysed.gov/sites/regents/files/123brca4.pdf>)

[June 2022: Proposed Amendment of Sections 52.21 and 80-3.7 of the Regulations of the Commissioner of Education Relating to the Content Core Requirement in](#)

³ Again, candidates who pursue additional Social Studies (Grades 5-9) and (Grades 7-12) certificates would complete 18 semester hours of coursework in social studies that includes study in economics, government, United States history, world history, and geography.

[Registered Teacher Preparation Programs and the Individual Evaluation Pathway to Certification for Candidates Who Are Seeking an Additional Science Certificate](https://www.regents.nysed.gov/sites/regents/files/622brca5.pdf)
(<https://www.regents.nysed.gov/sites/regents/files/622brca5.pdf>)

Recommendation

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

VOTED: That sections 52.21 and 80-3.7 of the Regulations of the Commissioner of Education be amended, as submitted, effective April 23, 2025.

Timetable for Implementation

If adopted at the April 2025 meeting, the proposed amendment will become effective as a permanent rule on April 23, 2025.

AMENDMENT TO THE REGULATIONS OF THE COMMISSIONER OF EDUCATION

Pursuant to sections 14, 101, 207, 208, 305, 308, 3001, 3004 and 3009 of the Education Law.

1. Subclause (1) of clause (a) of subparagraph (iii) of paragraph (3) of subdivision (b) of section 52.21 of the Regulations of the Commissioner of Education is amended to read as follows:

(1) specialist option - a major or the equivalent in English, a world language other than English, biology, chemistry, earth science, physics, mathematics, or social studies; provided that the content core in social studies shall include study in economics, government, and at least a total of 21 semester hours of study in the history and geography of the United States and the world. Provided, however, that:

(i) for candidates who hold a classroom teaching certificate[in a science certificate title, and are seeking a classroom teaching certificate in a different science certificate title(s)], other than a certificate in a specific career and technical subject (grades 7-12), and are seeking one or more additional classroom teaching certificates in middle childhood education (English, a world language other than English, biology, chemistry, earth science, physics, mathematics, or social studies), the program shall [only] require 18 semester hours of study for the content core in the subject area(s) of [the] such additional [science certificate title(s)] certificate(s); provided that the content core in social studies shall include study in economics, government, and history and geography of the United States and the world; and

(ii) for candidates who are simultaneously preparing for two or more classroom teaching certificates[in different science certificate titles], other than a certificate in a specific career and technical subject (grades 7-12), the program shall require a major or

the equivalent for the content core in [one of the subject areas of the science certificate title] the subject area of one certificate and [only] 18 semester hours of study for the content core in the subject area(s) of the additional [science certificate title(s)] certificate(s) in middle childhood education (English, a world language other than English, biology, chemistry, earth science, physics, mathematics, or social studies); provided that the content core in social studies shall include study in economics, government, and history and geography of the United States and the world; or

2. Clause (a) of subparagraph (iv) of paragraph (3) of subdivision (b) of section 52.21 of the Regulations of the Commissioner of Education is amended to read as follows:

(a) Content core. In addition to meeting the general requirements for the content core prescribed in clause (2)(ii)(a) of this subdivision, the content core shall be a major or its equivalent in one of the liberal arts and sciences that provides a knowledge base for assisting students in grades 7 through 12 in meeting the State learning standards for students, as applicable to one of the following subjects and prescribed in Part 100 of this Title: English, a world language other than English, biology, chemistry, earth science, physics, mathematics, or social studies, provided that the content core in social studies shall include study in economics, government, and at least a total of 21 semester hours of study in the history and geography of the United States and the world. Provided, however, that:

(i) for candidates who hold a classroom teaching certificate[in a science certificate title, and are seeking a classroom teaching certificate in a different science certificate title(s)], other than a certificate in a specific career and technical subject (grades 7-12), and are seeking one or more additional classroom teaching certificates in adolescence education (English, a world language other than English, biology,

chemistry, earth science, physics, mathematics, or social studies), the program shall [only] require 18 semester hours of study for the content core in the subject area(s) of [the] such additional [science certificate title(s)] certificate(s); provided that the content core in social studies shall include study in economics, government, and history and geography of the United States and the world; and

(ii) for candidates who are simultaneously preparing for two or more classroom teaching certificates[in different science certificate titles], other than a certificate in a specific career and technical subject (grades 7-12), the program shall require a major or the equivalent for the content core in [one of the subject areas of the science certificate title] the subject area of one certificate and [only] 18 semester hours of study for the content core in the subject area(s) of the additional [science certificate title(s)] certificate(s) in adolescence education (English, a world language other than English, biology, chemistry, earth science, physics, mathematics, or social studies); provided that the content core in social studies shall include study in economics, government, and history and geography of the United States and the world.

3. Clause (a) of subparagraph (v) of paragraph (3) of subdivision (b) of section 52.21 of the Regulations of the Commissioner of Education is amended to read as follows:

(a) Content core. Except as provided in [paragraph] paragraphs (1), (2), and (3) of this subdivision, in addition to meeting the general requirements for the content core prescribed in clause (2)(ii)(a) of this subdivision, the content core shall be a major or its equivalent in the subject area of the certificate that provides a knowledge base for assisting students in meeting the State learning standards for students, as applicable to one of the following subjects and prescribed in Part 100 of this Title: dance, family

and consumer sciences, health education, music, physical education, technology education, theatre, or visual arts.

(1) ...

(2) ...

(3) For certificates in one of the other special subjects (dance, family and consumer sciences, health education, music, physical education, technology education, theatre, or visual arts):

(i) for candidates who hold a classroom teaching certificate, other than a certificate in a specific career and technical subject (grades 7-12), and are seeking one or more additional classroom teaching certificates in a special subject, the program shall require 18 semester hours of study for the content core in the subject area(s) of such additional certificate(s); and

(ii) for candidates who are simultaneously preparing for two or more classroom teaching certificates, other than a certificate in a specific career and technical subject (grades 7-12), the program shall require a major or the equivalent for the content core in the subject area of one certificate and 18 semester hours of study for the content core in the subject area(s) of the additional certificate(s) in a special subject.

4. Clause (a) of subparagraph (xii) of paragraph (3) of subdivision (b) of section 52.21 of the Regulations of the Commissioner of Education is amended to read as follows:

(a) Content core. In addition to meeting the general requirements for the content core prescribed in clause (2)(ii)(a) of this subdivision, the content core shall include a major or its equivalent in agriculture or business and marketing, as applicable, that provides a knowledge base for assisting students in meeting the State

learning standards for students in career development and occupational studies, as prescribed in Part 100 of this Title. Provided, however, that:

(1) for candidates who hold a classroom teaching certificate, other than a certificate in a specific career and technical subject (grades 7-12), and are seeking an additional classroom teaching certificate in agriculture and/or business and marketing, the program shall require 18 semester hours of study for the content core in the subject area(s) of such additional certificate(s); and

(2) for candidates who are simultaneously preparing for two or more classroom teaching certificates, other than a certificate in a specific career and technical subject (grades 7-12), the program shall require a major or the equivalent for the content core in the subject area of one certificate and 18 semester hours of study for the content core in the subject area(s) of the additional certificate(s) in agriculture and/or business and marketing.

5. Subclause (1) of clause (b) of subparagraph (xvii) of paragraph (3) of subdivision (b) of section 52.21 of the Regulations of the Commissioner of Education is amended to read as follows:

(1) Admission requirements. Alternative teacher certification programs that are registered prior to July 1, 2001, shall meet the admission requirements in effect at the time of registration or the admission requirements of this subclause. All alternative teacher certification programs that are registered on or after July 1, 2001, shall meet the admission requirements of this subclause.

(i) ...

(ii) The program shall require candidates to hold a baccalaureate or graduate degree from an institution of higher education that is accredited by an institutional accrediting agency recognized for this purpose by the United States Department of

Education or from an institution authorized by the Board of Regents to confer degrees. Candidates shall have achieved a 3.0 cumulative grade point average, or its equivalent, in the program leading to the baccalaureate or graduate degree[,], or shall have been found by an officer designated by the registered alternative teacher certification program to have the necessary knowledge and skills to successfully complete the program, which finding shall be in writing and include the basis for that finding.

(iii) Candidates for a certificate in the classroom teaching service shall have completed an undergraduate or graduate major in the subject of the certificate sought, or an undergraduate or graduate major in a related field approved by the department for this purpose at the time of program registration, [except that candidates for a certificate in early childhood education, childhood education, and middle childhood education-generalist; or special education at the early childhood level and at the childhood level for programs registered prior to October 1, 2022; or in teaching common branch subjects in the lower (PreK-3) and upper (4-6) elementary grades (PreK-6) shall meet the requirements of item (iv) of this subclause.] provided that:

[(iv)] (A) Candidates for certificates in early childhood education, childhood education, and middle childhood education-generalist; or special education at the early childhood level and the childhood level for programs registered prior to October 1, 2022; or in teaching common branch subjects in the lower (PreK-3) and upper (4-6) elementary grades (PreK-6) shall have completed an undergraduate or graduate major in a liberal arts and sciences subject or interdisciplinary field.

[(v)] (B) Candidates for a certificate in students with disabilities adolescence (generalist) for programs registered prior to October 1, 2022, or all grades shall have completed an undergraduate or graduate major, concentration, or the equivalent, in

one or more of the liberal arts and sciences, and shall have completed at least six semester hours in each of the following subject areas: mathematics, English language arts, social studies, and science and have sufficient pedagogical skills to teach these subjects prior to completion of the program.

(C) Candidates who are simultaneously preparing for two or more classroom teaching certificates shall have completed an undergraduate or graduate major in the subject area of one certificate, or an undergraduate or graduate major in a related field approved by the department for this purpose at the time of program registration, and 18 semester hours of study in the subject area(s) of the additional certificate(s) in adolescence education, agriculture (all grades), business and marketing (all grades), middle childhood education specialist, and/or a special subject other than computer science (all grades); provided that the 18 semester hours of study for the additional certificate title(s) in social studies (grades 5-9) and (grades 7-12) shall include study in economics, government, and history and geography of the United States and the world.

6. The opening paragraph of section 80-3.7 of the Regulations of the Commissioner of Education is amended to read as follows:

This section prescribes requirements for meeting the education requirements for classroom teaching certificates through individual evaluation. Candidates who apply for any of the certificates in the classroom teaching service as described herein may continue to meet the education requirements for classroom teaching certificates through individual evaluation. [Candidates with a graduate degree in science, technology, engineering, or mathematics who apply for an initial teaching certificate under subclause (a)(3)(ii)(c)(3) of this section may continue to meet the education requirements for classroom teaching certificates through individual evaluation after May

1, 2014.] The candidate must have achieved a 2.5 cumulative grade point average or its equivalent in the program or programs leading to any degree used to meet the requirements for a certificate under this section. In addition, a candidate must have achieved at least a C or its equivalent in any undergraduate level course and at least a B- or its equivalent in any graduate level course, or, in response to the State of emergency declared by the Governor pursuant to an Executive Order for the COVID-19 crisis candidates may achieve a passing grade or its equivalent in any undergraduate or graduate level course completed during the Spring, Summer, or Fall 2020 terms, in accordance with the pass/fail grading policy or its equivalent at the institution of higher education (e.g., credit/no credit, pass/fail, satisfactory/unsatisfactory policy), in lieu of achieving at least a C or its equivalent in any undergraduate level course and at least a B- or its equivalent in any graduate level course, in order for the semester hours associated with that course to be credited toward meeting the content core or pedagogical core semester hour requirements for a certificate under this section. All other requirements for the certificate, including but not limited to, examination and/or experience requirements, as prescribed in this Part, must also be met.

7. Subdivision (a) of section 80-3.7 of the Regulations of the Commissioner of Education is amended to read as follows:

(a) Satisfaction of education requirements through individual evaluation for initial certificates in all titles in classroom teaching service, except in specific career and technical subjects [within the field of agriculture, business and marketing, family and consumer sciences, health, a technical area, or a trade] (grades 7 through 12).

(1) A candidate seeking to fulfill the education requirement for an initial certificate through individual evaluation of education requirements shall meet the general requirements prescribed in paragraph (2) of this subdivision, and the additional

requirements, if any, prescribed in paragraph (3) of this subdivision for the certificate title for which application is made. The [following initial certificates have no additional requirements prescribed in paragraph (3) of this subdivision: dance (all grades), health education (all grades), music (all grades), physical education (all grades), theater (all grades), visual arts (all grades),] initial certificate in the educational technology specialist (all grades) title[, agriculture (all grades), family and consumer sciences (all grades), business and marketing (all grades), technology education (all grades) and computer science (all grades)] has no additional requirements prescribed in paragraph (3) of this subdivision.

(2) ...

(i) ...

(ii) ...

(iii) Content core. The candidate shall complete 30 semester hours of coursework in the subject area of the certificate title, which may include no more than six of the 30 semester hours in a cognate, meaning a related field as determined by the department[; provided, however that a candidate seeking an initial certificate in computer science shall only be required to complete 12 semester hours of coursework in the subject area of the certificate title; provided further, however, that a candidate seeking an initial certificate in indigenous culture and language studies shall only be required to complete the number of semester hours of coursework in the subject area of the certificate title as prescribed in subparagraph (xiv) of paragraph (3) of this subdivision; provided further, however, that a candidate who holds a classroom teaching certificate in a science certificate title, and is seeking a certificate in a different science certificate title(s), shall only be required to complete 18 semester hours of coursework in the subject area(s) of the additional science certificate title(s)].

(iv) Pedagogical core. The candidate shall complete pedagogical coursework as prescribed in clause (a) of this subparagraph and teaching experience as prescribed in clause (b) of this subparagraph, provided that candidates identified in this subparagraph shall not be required to demonstrate completion of the pedagogical core requirements. A candidate who holds one or more [provisional certificates, permanent certificates, initial certificates,] initial, permanent, or professional certificates in a title in the classroom teaching service, other than a title in a specific career and technical subject (grades 7-12), shall not be required to demonstrate completion of the pedagogical core requirements for an additional initial certificate in the classroom teaching service sought, except for such candidates who are seeking an additional initial certificate in one or more of the following titles: early childhood education, childhood education, generalist in middle childhood education (grades 5-9), specialist in middle childhood education (grades 5-9), English to speakers of other languages (all grades), indigenous culture and language studies (all grades), literacy (birth-grade 6), literacy (grades 5-12), literacy (all grades), students with disabilities (birth-grade 2), students with disabilities (grades 1-6), students with disabilities (grades 5-9), students with disabilities (grades 7-12), students with disabilities (all grades), deaf and hard of hearing (all grades), blind or visually impaired (all grades), and speech and language disabilities (all grades).

(a)...

(b)...

(3) ...

(i) ...

(ii) Specialist in middle childhood education (5-9) and adolescence education (7-12).

(a) Content core. The content core prescribed in subparagraph (2)(iii) of this subdivision shall consist of 30 semester hours of coursework in the subject area of the certificate title sought (English, a world language other than English, biology, chemistry, earth science, physics, mathematics, or social studies); provided that candidates who hold one or more initial, permanent, or professional certificates in the classroom teaching service, other than a title in a specific career and technical subject (grades 7-12), and are seeking an additional classroom teaching certificate in middle childhood education or adolescence education (English language arts, a world language other than English, biology, chemistry, earth science, physics, mathematics, or social studies), shall be required to complete 18 semester hours of coursework in the subject area of such additional certificate title sought. For the titles of social studies (grades 5-9) and social studies (grades 7-12), within the 30 semester hour content core, the candidate shall complete coursework in economics and government, and a total of 21 semester hours of coursework that includes study in United States history, world history, and geography; provided that a candidate who holds one or more initial, permanent, or professional certificates in the classroom teaching service, other than a title in a specific career and technical subject (grades 7-12), shall be required to complete 18 semester hours of coursework in social studies that includes study in economics, government, United States history, world history, and geography.

(b) ...

(c) ...

(iii)

(iv)...

(v)...

(vi)...

(vii)...

(viii) ...

(ix) ...

(x) ...

(xi) ...

(xii) ...

(xiii) ...

(xiv) [Indigenous culture and language studies.

(a) Content core. The content core prescribed in subparagraph (2)(iii) of this subdivision shall consist of:

(i) 18 semester hours of coursework in the subject area of the certificate title; or

(ii) 12 semester hours of coursework in the subject area of the certificate title and acceptable proficiency in an indigenous language as determined by a designated official in the Nations who is approved by the department.

(b) Pedagogical core. Within the pedagogical core prescribed in subparagraph (2)(iv) of this subdivision, the candidate shall complete three additional semester hours in teaching literacy skills.] Special subjects (all grades), agriculture (all grades), and business and marketing (all grades).

(a) Special subjects other than computer science and indigenous culture and language studies. The content core prescribed in subparagraph (2)(iii) of this subdivision shall consist of 30 semester hours of coursework in the subject area of the certificate title sought (dance, family and consumer sciences, health education, music, physical education, technology education, theater, and visual arts); provided that candidates who hold one or more initial, permanent, or professional certificates in the classroom teaching service, other than a title in a specific career and technical subject

(grades 7-12), and are seeking an additional classroom teaching certificate in a special subject (dance, family and consumer sciences, health education, music, physical education, technology education, theater, or visual arts), shall be required to complete 18 semester hours of coursework in the subject area of such additional certificate title sought.

(b) Computer science. The content core prescribed in subparagraph (2)(iii) of this subdivision shall consist of 12 semester hours of coursework in computer science.

(c) Indigenous culture and language studies.

(1) Content core. The content core prescribed in subparagraph (2)(iii) of this subdivision shall consist of:

(i) 18 semester hours of coursework in the subject area of the certificate title; or

(ii) 12 semester hours of coursework in the subject area of the certificate title and acceptable proficiency in an indigenous language as determined by a designated official in the Nations who is approved by the department.

(2) Pedagogical core. Within the pedagogical core prescribed in subparagraph (2)(iv) of this subdivision, the candidate shall complete three additional semester hours in teaching literacy skills.

(d) Agriculture and business and marketing. The content core prescribed in subparagraph (2)(iii) of this subdivision shall consist of 30 semester hours of coursework in the subject area of the certificate title sought (agriculture and business and marketing); provided that candidates who hold one or more initial, permanent, or professional certificates in the classroom teaching service, other than a title in a specific career and technical subject (grades 7-12), and are seeking an additional classroom teaching certificate in agriculture and/or business and marketing, shall be required to

complete 18 semester hours of coursework in the subject area of such additional
certificate title sought.

ASSESSMENT OF PUBLIC COMMENT

Following publication of the Notice of Emergency Adoption and Proposed Rule Making in the State Register on December 24, 2024, the Department received the following comments on the proposed amendment:

1. COMMENT: Multiple commenters supported the proposed rule. Some indicated that it has been challenging to fill teacher vacancies. One commenter expressed that the current semester hour requirements make it more difficult for teachers to use their instructional skills in another content area. Another commenter, a school district administrator, explained that the current 30-credit hour requirement was a financial and time barrier for candidates interested in teaching hard to staff subjects. This administrator also indicated that they support this rule as some staff are willing to earn a second certificate to address the district's needs.

DEPARTMENT RESPONSE: These comments are supportive of the proposed rule; therefore, no changes are necessary.

2. COMMENT: Multiple commenters did not support the proposed rule because they believe that reducing the content area credit hour requirement for subject areas such as dance, health, and physical education will compromise the pedagogical background needed to provide quality educational experiences and would lead to teachers who do not have the pedagogical content knowledge to safely and effectively instruct students. The commenters believe that health and physical education teachers must possess a bevy of skills and knowledge, and the proposed rule diminishes the value of such programs. The commenters also indicated that shortages in many of the subject areas in the proposed rule have not been documented.

DEPARTMENT RESPONSE: The Department agrees that all teachers must have both content knowledge and pedagogical skill to work effectively with students. The proposed rule does not change the pedagogical core requirement for teaching certificates and registered teacher preparation programs. The proposed rule also only relates to teachers and teacher candidates who are seeking certain additional teaching certificates. As such, these individuals have already completed the necessary pedagogical coursework for the classroom by meeting the requirements for their first teaching certificate.

Additionally, while the proposed rule reduces the number of content area credit hours required to obtain an additional certificate from 30 to 18, it maintains the requirement to take and pass the content knowledge examination in the subject area of the certificate sought. This requirement ensures that each individual has the necessary content knowledge, including pedagogical content knowledge, aligned with the relevant New York State learning standards, maintaining high standards for entry into the profession. Specific to the New York State Teacher Certification Examinations (NYSTCE) health education and physical education content specialty tests, there are several competencies within [each test framework](#) that explicitly address the concerns raised by the commenters.

Although some of the subject areas in the proposed rule are not designated statewide teacher shortage areas, some schools and school districts may have local shortages in those areas. Additionally, all schools and school districts benefit from hiring teachers from a large, high-quality pool of candidates. No changes to the proposed rule are necessary.

3. COMMENT: Multiple commenters who are students currently enrolled in undergraduate physical education teacher education programs described the content

and pedagogical coursework that they completed and/or were currently completing as part of their registered teacher education program. The commenters noted the importance of completing coursework related to instructional methods, curriculum, assessment, methods for instructing special education students, and content area coursework in kinesiology and do not believe that all of this coursework could be completed in 18 credit hours.

DEPARTMENT RESPONSE: The Department agrees that all teachers must have both content knowledge and pedagogical skills to work effectively with students and that this cannot be accomplished with only 18 credit hours of study. Please see the Department's response to Comment #2. No changes to the proposed rule are necessary.

4. COMMENT: Multiple commenters requested that physical education be excluded from the proposed rule because they do not believe that there is a statewide shortage of physical education teachers. The commenters believe that the physical education teaching assignments are unlike other classroom teaching assignments because of the range of possible activities undertaken in the physical education classroom (e.g., aquatics, Zumba, outdoor education, team sports) and the proposed rule would impact the physical education teacher preparation program's ability to provide a comprehensive pedagogical background to teacher candidates. The commenters believe that it is only possible to do this work by taking numerous pedagogical and content courses specific to physical education.

DEPARTMENT RESPONSE: The Department agrees that all teachers must have both content knowledge and pedagogical skills to work effectively with students and that this cannot be accomplished with only 18 credit hours of study. Please see the

Department's response to Comment #2. No changes to the proposed rule are necessary.

5. COMMENT: A commenter expressed concern that physical education teachers who do not have the necessary knowledge and skills in the content area could create safety and liability issues for schools. Additionally, the commenter believes that teachers who currently teach in a shortage area and eventually obtain an additional teaching certificate in physical education or health could exacerbate vacancies in shortage areas if they leave their current position for one in physical education or health.

DEPARTMENT RESPONSE: The Department agrees that physical education teachers must have both content knowledge and pedagogical skills to work effectively with students and ensure their safety, mitigating liability issues. The Department further believes that expanding the pool of available, high-quality candidates to teach various subjects statewide will help to address both statewide and local hiring needs. Please see the Department's response to Comment #2. No changes to the proposed rule are necessary.

6. COMMENT: A commenter expressed concern that the proposed rule would result in candidates obtaining certification without having the necessary pedagogical skills. The commenter also noted that health, physical education, music, theatre, and visual arts are all distinct areas with their own content and that P-12 students would be negatively impacted if their teachers did not have a strong understanding of the specific content area in which they will be teaching. The commenter also noted that special subject area coursework can help students, particularly underserved students, remain interested and engaged in school, and that this benefit would be diminished if their teachers are not properly prepared.

DEPARTMENT RESPONSE: Please see the Department's response to Comment #2. No changes to the proposed rule are necessary.

7. COMMENT: Multiple commenters requested that the social studies content area be excluded from the proposed rule because they do not believe there is a statewide shortage of social studies teachers. The commenters argue that 18 credit hours of social studies content without any pedagogical coursework would result in poorly prepared teachers who are not able to pass certification exams or effectively teach in the classroom. The commenters further note that teacher preparation programs interested in offering dual-certification programs that include social studies as one of the certificate areas would not be able to adequately address the necessary content if they are limited to 18 credit hours of social studies content.

DEPARTMENT RESPONSE: Although social studies is not a designated statewide teacher shortage area, some schools and school districts may have local shortages in this area. Additionally, all schools and districts benefit from hiring teachers from a large, high-quality pool of candidates. The Department agrees that all teachers must have both content knowledge and pedagogical skill to work effectively with students. The proposed rule only relates to teachers and teacher candidates who are seeking certain additional certificates. As such, these individuals have already completed the necessary pedagogical coursework for the classroom by meeting the requirements for their first teaching certificate.

Additionally, while the proposed rule reduces the number of content area credit hours required to obtain an additional certificate from 30 to 18, it maintains the requirement to take and pass the content knowledge examination in the subject area of the certificate sought. With specific respect to social studies, the proposed rule requires an individual to complete coursework in economics, government, and history and

geography of the United States and the world. These requirements ensure that the teacher has the necessary content knowledge, including pedagogical content knowledge, aligned with the relevant New York State learning standards.

The proposed rule is intended to balance additional flexibility for teachers who wish to obtain additional certificates with the need to ensure that teachers do, in fact, have the necessary content knowledge prior to receiving certification. Individuals who do not pass the content knowledge examination after completing 18 credit hours of coursework—or even 30 credit hours of coursework—may need to enhance their preparation for the exam, which could include taking additional courses. For individuals who are very close to passing the content knowledge examination, the Board of Regents [recently adopted a permanent rule](#) that creates flexibilities related to certification examination requirements. No changes to the proposed rule are necessary.

8. COMMENT: A commenter asked several questions and raised concerns as to how this proposal would impact the preparation of English teachers. First, the commenter indicates that, if the proposed rule is permanently adopted, some of the candidates currently enrolled at their institution of higher education might be interested in pursuing an additional certificate in English. However, the commenter expressed concern about the ability of a candidate with only 18 credit hours in English to pass the content specialty test because some students already find the exam challenging with the current credit hour requirement. Because of this, the commenter expresses uncertainty as to whether their institution would recommend that candidates pursue a certificate after completing only 18 credit hours. Next, the commenter pointed out that a teacher who obtains an additional certificate and moves to a different school or classroom creates a vacancy in their prior position. However, the commenter later acknowledges that the proposed rule could allow for candidates to teach in more than

one area. Finally, the commenter expressed concern regarding the lack of additional methods courses and field experiences in the subject area of additional certificates, which is primarily a concern for certificate areas that are not similar (e.g., math and English).

DEPARTMENT RESPONSE: With respect to staffing challenges, the purpose of the proposed rule is, as the commenter describes, to expand the content areas and courses that can be taught by an individual teacher. This will allow school districts and BOCES to offer more courses to students in a variety of areas, including hard to staff subject areas and areas where there is an unexpected vacancy. This approach may prove particularly useful for school districts that experience challenges in attracting new teachers or who do not have a large enough number of full-time positions or students to employ an individual teacher for certain subject areas.

Regarding the certification examination requirement, the proposed rule is intended to balance additional flexibility for teachers who wish to obtain additional certificates with the need to ensure that teachers do, in fact, have the necessary content knowledge prior to receiving certification. Individuals who do not pass the content knowledge examination after completing 18 credit hours—or even 30 credit hours—of content area coursework may need to enhance their preparation for the exam, which could include taking additional courses. For individuals who are very close to passing the content knowledge examination, the Board of Regents [recently adopted a permanent rule](#) that creates flexibilities related to certification examination requirements.

Regarding the concerns related to methods coursework and field experiences, if a registered teacher preparation program chooses to offer a course of study that leads to dual or multiple certifications, they could design a program that includes additional pedagogical coursework in the area of the additional certificate. Additionally, the

proposed rule does not eliminate the requirement that there be a student teaching experience in the subject area of each certificate or the requirements for program-specific pedagogical core. No changes to the proposed rule are necessary.

9. COMMENT: A commenter requested that the proposed rule be modified to include library media specialists given a demonstrated shortage in this certificate area. The commenter also suggested that teachers who hold a certificate at the adolescent developmental level should be required to take pedagogical coursework at the childhood developmental level if they seek an additional certificate in an area that covers all grades. The commenter also requested that the proposed rule require preparation in some areas, such as safety in laboratory and physical education settings and sensitive information in health classrooms. Finally, while the commenter supports the proposed rule, they requested that the Department examine ways to address staffing challenges that do not lower teacher education requirements.

DEPARTMENT RESPONSE: The Department continues to examine teacher certification requirements and additional ways to expand opportunities for current educators and recruit new educators while maintaining high standards for entry into the profession. Department staff will consider the commenter's suggestion regarding library media specialist certification.

The proposed rule does not change the pedagogical core requirement for teaching certificates and registered teacher preparation programs. For example, currently, teachers who hold a certificate at a specific developmental level (e.g., grades 5-9 or 7-12) are not required to take additional pedagogical coursework if they seek an additional certificate in an area that covers all grades. Thus, the comment is beyond the scope of the proposed rule.

With respect to the commenter's concerns related to student safety, the NYSTCE test frameworks for science content specialty tests require individuals to demonstrate knowledge of how to plan and safely carry out scientific investigations and knowledge of the safe and proper use of equipment and materials in school science investigations. Similarly, the NYSTCE physical education content specialty test includes [several competencies](#) related to ensuring student safety, just as the health education content specialty test includes [competencies](#) related to how health educators engage with students around sensitive topics. No changes to the proposed rule are necessary.