

We would like to begin by thanking you for your service and efforts in improving the state of education in New York State. We appreciate your efforts to respond to the teacher shortages across New York State and join you in your efforts.

As a statewide literacy organization, we are responsible for representing the values of our organization and our membership as it relates to any state-level changes in legislation, rules of the Board of Regents, and regulations of the Commissioner of Education. Therefore, we would like to bring your attention to the following list of concerns we have regarding the proposed amendments to Section 30-1.8 of the Rules of the Board of Regents and Sections 52.21, 80-1.2, 80-3.2, and 80-3.7 of the Regulations of the Commissioner of Education:

1. The current Literacy Certification pathways (Birth-Grade 6 and Grades 5-12) allow for intentional and deliberate course instruction and practicum experience at specific development levels and in specific content areas. The proposed change to Literacy (All Grades) certification as the only certification option would not encourage such specialized literacy learning or instruction.
2. According to the February 3, 2022 memo, "One year of paid, satisfactory, full-time experience as a literacy teacher at the elementary **and/or** secondary level may be accepted in lieu of the practicum in literacy when such experience is verified by the employing school district administrator." The "or" in this clause would not allow those who gain the new license to develop the nuanced, grade-specific expertise that is required of certifying NYS literacy education programs.
3. The proposed increase to double the required supervised practicum hours for certifying literacy education programs may result in:
 - a. a **decrease in enrollment in Literacy Certification programs** due to the additional time commitment required by these changes (i.e., more practicum hours and additional coursework), and
 - b. a **decrease in enrollment in Literacy Certification programs** due to the additional financial costs required by these changes (i.e., additional coursework).
4. The proposed change to Literacy (All Grades) may result in an **increase in required funding for institutions of higher education** in order to hire additional faculty and staff to teach the additional courses that currently existing certification levels do not require (i.e., secondary literacy course instruction for Birth-Grade 6 candidates, elementary literacy course instruction for Grades 5-12 candidates).
5. The proposed increase to the practicum hours for literacy certification may result in **an increased difficulty of finding placements** for Literacy Certification candidates.
 - a. Many of the Literacy certificate candidates in New York State are full-time teachers or full-time substitutes. As a result, practicum hours must be offered after school or between K-12 academic years.
 - b. Literacy practicum placements, which often occur after school hours, compete with the vast offerings of after school and summer activities in school buildings. This makes scheduling 50 practicum hours difficult, and an increase to 100 hours of supervised practicum experience exacerbates this issue.
6. The proposed increase to the practicum hours for literacy certification could **exacerbate the K-12 substitute teacher shortage**.

- a. The proposed increase to the practicum hours for literacy certification could require candidates who serve as full-time teachers to be pulled from teaching placements to meet the needs of the additional supervised practicum hours.
 - b. The proposed increase to the practicum hours for literacy certification could require candidates who serve as substitute teachers to deny substitute requests from K-12 school districts so they have time to meet the requirements of the additional supervised practicum hours.
7. Institutes of higher education may no longer be able to offer a Special Education/Literacy dual certification program due to the increase in course work and practicum hours these proposed changes require. This may result in an **decrease of Special Education certificate holders** and exacerbate Special Education teacher shortages.
8. Eliminating the developmentally-leveled licenses will decrease the literacy teaching skills of both elementary-level common branch and secondary-level content area teachers across New York State. Elementary schools need literacy-certified classroom teachers with suitable expertise in the development of emergent, beginning, transitional, and intermediate literacy skills. Content-area departments at the secondary level, such as social studies and science, need to have literacy-certified classroom teachers to assist with addressing students' literacy challenges across the curriculum. Retaining the B-6 and 5-12 certification options will make it possible for teachers who do not intend to become literacy specialists to be able to readily increase their literacy knowledge and improve their teaching practices in reading and writing.

As a result, **the proposed amendments will likely exacerbate the literacy educator shortage that these proposed amendments attempt to address.**

Therefore, we would, respectfully, make the following recommendations:

1. We recommend that the Board consider examining disaggregated data by geographic region to determine which certification areas are in need in those areas outside of New York City.
2. We recommend that the Board consider collecting more specific information about regional literacy specialist shortages at Birth-Grade 6 and Grades 5-12, respectively.
3. We recommend providing flexibility for individual school districts to allow teachers with dual certification to move across teaching assignments to address temporary needs without losing tenure in their original certification areas.
4. We recommend that the Board
 - a. provide a two-year window to allow current Literacy certification programs to apply to the New York State Department of Education for certificate extensions to the additional grades not already offered by the currently existing certification levels;
 - b. include Literacy (Birth-Grade 6), Literacy (Grades 5-12), and Literacy (All Grades) as certification options; and
 - c. revise the proposed amendment to allow for Literacy (All Grades) certification to be obtained without increasing the required number of practicum hours (e.g., maintain 50 hours of supervised practicum).

Sincerely,

The New York State Reading Association