November 5, 2013

The Honorable Merryl H. Tisch
Chancellor of the New York State Board of Regents
New York State Education Department
89 Washington Avenue
Albany, New York 12234

Dear Chancellor Tisch:

I am writing at the direction of the Board of Directors (BOD) of the School Administrators Association of New York State (SAANYS). The BOD is made up of 27 active school administrators evenly distributed across the state, and come from BOCES, large and small city school districts, as well as suburban and rural districts. They sit in a representative capacity, reflecting the voice of building and program administrators statewide.

The purpose of this letter is to clearly communicate concerns we have with respect to the state of implementation of the Regents' reform agenda, as well as our recommendations for corrective action. Our concerns are as follows:

1. Without the State Education Department acknowledging the concerns consistently being raised by those in the field, and affirmatively addressing those concerns, support for changes designed to improve instruction and student achievement may wane. Ultimately the multi-layered reform agenda may collapse as a result of its complexity, its accelerated implementation schedule, and the high-stakes consequences for students and educators.

2. The nature of the relationship between SED and building level administrators is at serious risk of being negatively altered. There is growing concern that SED lacks empathy for the daily demands currently placed on building level administrators, which continue to increase. There is concern that a growing number of building level administrators characterize SED as “top-down” and adversarial rather than receptive, responsive, and supportive.

3. Curricula development and implementation has been highly uneven around the state, as has professional development related to the Common Core Learning Standards (CCLS), including the Network Team Institute training. Some curriculum modules are incomplete and others are on back order. Without the proper preparation of the teaching and administrative staffs, successful implementation is unlikely.
4. Students should not be tested on materials that they have not been taught.

5. The reform agenda has resulted in a dramatic increase in test preparation and testing; significantly different and new testing not designed to improve instruction. Let us acknowledge that much of this testing has been imposed or implemented as a result of the NYS APPR law, and does not solely emanate from federal ESEA requirements.

6. High-stakes consequences of test results, for both students and staff, will risk having the deleterious effect of converting our schools into being test-prep focused, which ironically could defeat the deeper integrated thinking the CCLS was intended to promote.

Our recommended corrective actions are as follows:

1. Take a step back and develop a new implementation schedule that recognizes that positive instructional shifts take time and should be logically sequenced. Listen to instructional leaders and be prepared to adapt as necessary. It is essential to build understanding and capacity in advance of attempted implementation.

2. Complete the development of a comprehensive set of SED-generated CCLS curricula and instructional materials by an attainable and disclosed date certain. Require that those districts choosing to develop curricula on their own have it developed by a date certain, following the release date of the SED-generated materials, all before implementation.

3. Require that some expressed minimum amount of CCLS-related professional development be provided to teachers and administrators, by a date certain. Offer financial support for this effort to those districts that need it. To date, no objective benchmarks have been established for the appropriate training of professional staff.

4. Support the timely and comprehensive release of test questions and answers that would allow in-depth item analysis to inform instruction and improve student learning.

5. Postpone the implementation of the Common Core Regents exams as a graduation requirement. If the 3-8 tests are any guide, failure to do so will likely result in a marked decrease in the high school graduation rate, and diminish college and career readiness for many students.

6. If you choose to use Common Core Regents exams for high school graduation, we urge you not to reach pass rates consistent with prior years by manipulating scoring rubrics or cut scores. Such an effort would be plainly evident in the field. Full and honest transparency is essential to SED’s credibility.
7. Support the call for a moratorium on the use of state assessments for high-stakes consequences for students and staff alike. After a properly sequenced implementation, ensure an informed, neutral, third party analysis of the reform effort - including the CCLS, APPR, and associated testing - to determine what adjustments may then be appropriate. Such actions would be seen in the field as supportive of educators and students, and a responsive approach to legitimate concerns.

Our members support improved instruction and higher standards that will better prepare our students for a more competitive future. We do not write to cast blame or aspersions, but rather to communicate that in our view, the building and program level view, the current course is not working and the method of implementing the reforms is not supported by many of those charged with their implementation. We too want to attain the higher goal of improved educational opportunities for students, but feel the current course will not get us there.

Very truly yours,

Kevin S. Casey
Executive Director

cc: Members of the Board of Regents
Dr. John B. King, Jr., Commissioner of Education
Members of the SAANYS Board of Directors
Hon. John Flanagan, NYS Senator
Hon. Catherine Nolan, NYS Assemblymember
De'Shawn Wright, Deputy Secretary for Education