



## NEW YORK STATE ASSOCIATION FOR BILINGUAL EDUCATION

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May 15, 2015

Dr. Elizabeth Berlin, Interim Commissioner, NYSED

Dr. Cosimo Tangorra, Jr., Deputy Commissioner, Office of P-12 Education, NYSED

Dr. John D'Agati, Deputy Commissioner, Office of Higher Education, NYSED

Dear Drs. Berlin, Tangorra, and D'Agati,

The New York State Bilingual Education Association (NYSABE), in collaboration with NYS TESOL, and other bilingual education organizations and professionals, assisted NYSED in the development of the *Blueprint for ELLs Success* as well as the recently adopted amendments to Commissioner's Regulations Part 154 which strengthen efforts to support and improve instruction for ELLs/bilingual learners across New York State. One of the impacts of the amended CR Part 154 is an increase in the need for certified teachers of English to Speakers of Other Languages (ESOL) and teachers with Bilingual Extensions in different regions across New York State.

Similar to our partner organizations, we are all concerned about how this shortage of teachers will affect our students. We are all in agreement that having appropriately certified classroom teachers is a priority. In response to the increased need, NYSED has proposed alternate pathways for Supplementary Bilingual Education (BE) Extensions and Supplementary Certificates for English to Speakers of Other Languages (ESOL) teachers (NYSED memo, March 9, 2015).

On behalf of NYSABE, I thank the NYSED for providing us with an opportunity to comment and make recommendations regarding these proposed alternate pathways. We understand that the "purpose of a supplementary certificate is to authorize a teacher who is currently certified in a title in the classroom teaching service to teach in a different title in the classroom teaching service for which there is a **demonstrated shortage of teachers...**" (our emphasis).

As an organization, we are currently faced with the dilemma of equally unacceptable choices in attempting to educate our ELLs/bilingual learners and balancing the need to serve them with an underprepared teacher or not to serve them at all. In this regard, we agree that an alternative pathway for a Supplementary Bilingual Education (BE) Extension Certificate is necessary, but **not** as proposed by NYSED. In this regard, we offer the following recommendations as an alternative.

## **RECOMMENDATIONS**

The recommendations and concerns expressed below are framed by the underlying premises that (1) we are all stakeholders in ensuring that our ELLs/bilingual learners are receiving the required services pursuant to CR Part 154, that (2) we must all work diligently to support these efforts, and that (3) we must ensure that all ELLs/bilingual learners are served by qualified, fully certified teachers.

### **Recommendation 1 –**

A school district approving a teacher for a supplementary certification in English to Speakers of Other Languages (ESOL) and/or with a Bilingual Extension must report to NYSED its good faith efforts to recruit fully certified teachers of English to Speakers of Other Languages (ESOL) and teachers with Bilingual Extensions and the results of such efforts. Approval of supplementary certifications must be contingent on a review of the school district's recruitment efforts and results in a manner as prescribed by the Commissioner

### **Recommendation 2 –**

A school district with approved teachers holding supplementary certifications as teachers of English to Speakers of Other Languages (ESOL) and teachers with Bilingual Extensions must report to NYSED the candidates' academic status and progress toward fulfilling certification requirements in a manner as prescribed by the Commissioner.

### **Recommendation 3 –**

Regarding Pathway I for Bilingual Extensions, we agree that the supplementary teacher candidate must:

- have completed or be currently enrolled in a course leading to three semester hours in bilingual education, including study in the theories of bilingual education and multicultural perspectives (currently proposed);
- submit evidence of having achieved a satisfactory level of performance on the bilingual extension assessment (currently proposed);
  - **CONCERN:** Please clarify whether the “bilingual extension assessment” is the same as or different from the “bilingual education assessment (BEA)” administered by NYSTCE. We would agree if the proposed exam is clearly and unambiguously the NYSTCE “BEA,” similar to the articulation of the “ESOL CST” in the proposed pathway for the ESOL supplementary certificate. If it is a different test, we must be informed of its content and make-up so that we can make an appropriate determination of its acceptability.
  - **CONCERN:** Please clarify whether “satisfactory level of performance” for the bilingual extension assessment is the same level of performance required of all Bilingual Education teacher candidates who take the Bilingual Extension Assessment (BEA). We would agree if the “satisfactory level of performance” is equal to that on the BEA. We would disagree if the required level of performance is lower because it is the only objective indicator, in lieu of coursework, to determine whether the supplementary certificate candidate has the minimum threshold of knowledge necessary to teach in a bilingual setting.

- be required to be currently enrolled/matriculated in a registered preparation program or become enrolled/matriculated within one year of issuance of the supplementary certificate;
- be required to provide documentation of ongoing and continuous progress toward fulfilling the full certification requirements;
- be required to complete the balance of required coursework for full certification within three years;
- be clearly informed that the supplementary certificate is valid for three years and non-renewable.

#### **Recommendation – 4**

Regarding Pathway II for Bilingual Extensions, **we reject this proposal.** We are not confident and secure that “evidence of satisfactory bilingual teaching experience” is demonstrative of a “satisfactory experience.” That evidence is typically provided by the candidate’s supervisor who is typically a generalist with limited or no formal preparation regarding ELLs/bilingual learners. Further, the supervisor may not be bilingual in the language of service to be able to attest to the accuracy or language proficiency of the candidate. In addition, there is no objective teacher evaluation rubric that includes indicators of effective bilingual instruction among the NYS approved materials. Lastly, this requirement does not indicate the currency or distribution of the teaching experience which could be as recent as the last two years, or cumulative service over irregular periods, or service that may have occurred more than five or ten years earlier.

#### **Recommendation 5 –**

Lastly, we believe that NYSED must also take affirmative actions in ensuring that there are a sufficient number of registered preparation programs available in which to matriculate all of these supplementary certificate holders. We recommend and strongly urge NYSED to:

- work with institutions of higher education (IHEs) across the state to establish sufficient registered certification programs for Bilingual Education (BE) Extensions and teachers of English to Speakers of Other Languages (TESOL) to meet the growing demands;
- establish and develop an expedited process for approving registered certification programs for Bilingual Education (BE) Extensions and teachers of English to Speakers of Other Languages (TESOL);
- assist IHEs which have Bilingual Education and TESOL programs to increase their enrollment capacities;
- provide funds to incentivize current and potential candidates to become Bilingual Education and ESOL teachers (e.g., Intensive Teacher Institutes).

We thank you in advance for your serious and thoughtful consideration of our recommendations, and look forward to seeing them included in the final proposal to the Board of Regents.

Sincerely,



Tatyana Kleyn, Ed.D.  
NYSABE President