January 12, 2018

Kelly Grace
New York State Department of Education
89 Washington Ave
Albany NY 12234

Dear Ms. Grace:

The undersigned members of the College in High School Alliance write in support of the New York State Department of Education’s proposed changes to the Transitional G Certificate program. Please consider these comments as our official response to the proposed regulations that were issued in the November 29, 2017 State Register.

Background on the College in High School Alliance

The College in High School Alliance is a coalition of leading national, state, and local organizations committed to policies that support high-quality dual or concurrent enrollment and early college high school programs. The CHSA believes that greater support for these models at the federal, state, and local levels will significantly improve the secondary and postsecondary outcomes of students, particularly those from low-income or middle-class backgrounds and underserved populations. More information about the College in High School Alliance is available on our website: www.collegeinhighschool.org

Policy Barriers to Hiring College Professors

New York State currently does not have a seamless certificate pathway to allow college instructors across disciplines to teach in secondary school classrooms. College faculty can use the Transitional C Certificate, but this requires enrollment in a teacher training program, coursework, and examinations that take time and resources and can prevent or dissuade qualified candidates from pursuing teaching at the secondary school level. The Transitional G Certificate is a much clearer pathway, but to date has only applied to college professors teaching in STEM fields. Furthermore, college faculty in STEM fields have encountered challenges qualifying for the Transitional G Certificate due to the specificity of the type of higher education teaching experience and degree title required.

Creating a pathway for qualified college instructors to teach at the secondary school level will improve the quality of instruction and rigor in New York’s public high schools and increase alignment between secondary and postsecondary education. Postsecondary instructors are strong fits for early college high schools, dual enrollment programs, other accelerated learning opportunities, and Career and Technical Education programs, and can staff hard to fill teaching positions. Broadening the Transitional G Certificate from STEM professors to college professors teaching across all disciplines for which there is a certificate title will allow many more college faculty to make the transition between postsecondary and secondary education.
Recommendations for the Expanded Transitional G Certificate

To allow the expanded Transitional G Certificate to have as great an impact as possible, we urge the New York State Department of Education (NYSED) to make some adjustments and clarifications around how NYSED assesses the postsecondary experience required to qualify for the Transitional G Certificate.

I. Count college adjunct teaching experience and teaching during a Ph.D. or post-doctoral fellowship towards the requirement of two years of satisfactory postsecondary teaching experience

First, we urge NYSED to count adjunct teaching experience and teaching during a Ph.D. or post-doctoral fellowship in situations where the individual is the lead or co-lead instructor, responsible for his/her class, towards the requirement of two years of satisfactory postsecondary teaching experience. Given the landscape of higher education teaching and the limited number of full-time professorships, many college faculty have part-time teaching positions, which are directly relevant for their high school teaching. Having NYSED clarify that college adjunct and part-time lead or co-lead teaching experience will count towards the postsecondary teaching requirement for the Transitional G Certificate and accepting a range of common titles, including professor, instructor, lecturer, teaching fellow, and adjunct professor, will allow more qualified college instructors in New York State to take advantage of this pathway opportunity, to the benefit of the public secondary school students they serve.

II. Count two or more college courses per semester as full-time teaching

The standards for full-time course loads differ between secondary and postsecondary education. Teaching two or more college courses per semester is considered full-time at the country’s premier colleges and universities. In keeping with those standards, we urge NYSED to count two or more college courses per semester taught by a full-time, adjunct, or part-time lead or co-lead instructor, as full-time teaching, to allow more college instructors, including those coming from research universities, to qualify for the Transitional G Certificate.

III. Broaden the eligible degree titles within a discipline beyond the specific certificate title

Finally, we urge NYSED to allow candidates with a range of degree titles within a discipline to obtain a Transitional G Certificate for the certificate area to be taught. For example, a candidate with a Ph.D. in neuroscience should be able to obtain a Transitional G Certificate for Biology; a candidate with a Ph.D. in computational science or engineering should be able to obtain a Transitional G Certificate for Mathematics; and a Ph.D. in anthropology should be able to obtain a Certificate for Social Studies. To date, flexibility in the match between the degree title and the corresponding certificate area to be taught has been limited. Broadening the eligible degree titles within a field beyond the specific title of the certificate will allow more college instructors to use the Transitional G Certificate and bring their expertise into their secondary school classrooms.

In summary, these recommendations to 1) count college adjunct teaching experience and teaching during a Ph.D. or post-doctoral fellowship towards the requirement of two years of satisfactory postsecondary teaching experience; 2) count two or more college courses per semester as full-time teaching; and 3) broaden the eligible degree titles within a discipline beyond the specific certificate title will allow more qualified college instructors to take advantage of the Transitional G Certificate, to the benefit of the schools in which they teach and the students they serve.
Thank you for the opportunity to provide comments. For any questions, please contact Alex Perry, Coordinator of the College in High School Alliance, at (202) 431-7221.

Sincerely,

Bard College
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Jobs for the Future
KnowledgeWorks
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National Association for College Admission Counseling
New York Council of School Superintendents
New York State Association for College Admission Counseling