



New York State Technology Education Association
Chartered by the Board of Regents of the State of New York
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To: The Honorable Members of the Board Regents
Cc: Assistant Commissioner James Butterworth, James Kadamus, and David Payton
From: Alta Jo Longware, President NYSTEA 2004-05
Re: Response to the Strategy to Implement the Regents Policy Statement
on Middle-Level Education Dated December 1, 2004
Date: December 30, 2004

The New York State Technology Education Association (NYSTEA), on behalf of the 3000 Technology Education teachers that it represents, commends the New York State Education Department's efforts to improve the quality of middle-level education.

NYSTEA endorses efforts to provide additional support for high need, low performing, and schools in crisis so they can close the gap. The Association is encouraged that students in the Big Five School Districts who have previously been denied Technology education, Home and Careers, and other educational programs will now have access to those programs through the reform efforts. It is imperative that all school districts are required to comply with regulations if flexibility options are implemented. NYSTEA is prepared to work with SED to provide the support necessary to make quality Technology education programs an important part of the middle-level experience for all students.

NYSTEA needs SED to understand that we are concerned that some schools may try to use the flexibility that is provided under Models B and C, to eliminate programs rather than to improve them. Too often, schools seeking a quick fix or working within budget constraints, opt to eliminate programs that are important to student success. A recent CTE program evaluation indicated that students who are engaged in Career and Technical Education programs, such as Technology education, have higher academic success rates and lower drop out rates. It is imperative that schools understand the importance of the CTE connection and strive to create programs with rigor, relevance and application. The study also identified the need for implementing CTE programs at the middle-level. Technology education has programs that are engaging to students and enable them to put into context important academic knowledge and skills. The Association is ready to assist teachers throughout the state to develop programs with appropriate rigor, relevance and application.

NYSTEA has created the attached chart of recommended changes to the design principles of the three models. We believe these suggestions are critical to ensure that programs are not selectively eliminated or inappropriately "integrated" due to budget constraints. The chart references statements from the models, lists a recommendation that would clarify the statement and provides a rationale for the recommendation.

NYSTEA also requests clarification of the following concerns:

A) The lack of specific guidelines for the approval and continuation of regulatory relief.

- 1) Which schools can now apply for Model B and Model C status under the new proposal? (The chart that described school eligibility was deleted in the new proposal.)
- 2) Does the Model C limit of 50 applications reflect buildings, schools, districts or overall number of applications?
- 3) Does the limit of 50 applications include applications for specific program enhancements?
- 4) If all schools that are eligible for Model B status apply; will the State have the capability to review all Model B applications as well as 50 or more Model C applications?
- 5) If more than 50 applications are received, how will schools be selected for approved Model C status?
- 6) Will the State create a “Document for reform application & checklist?”
- 7) Will there be a probationary period for all levels of regulatory relief?
- 8) Will progress be monitored and reported to the State yearly?
(A lot can go wrong in 3 years, let alone in 5 years!)
- 9) Who is the watch-dog of this entire process?
- 10) If after the best intentions of the Regents regarding ML policy are put in place, school districts are found to abuse their responsibilities in meeting the intentions of Commissioners Regulations, what mechanisms are in place to protect students and end the abusive behavior?
(“Winning compliance” idea of creating consequences for non-compliers.)

NYSTEA encourages a highly conservative approach for approval of any Model C School or Program and recommends that the design principles for the model articulate the following:

- 1) Limit the number of approved Model C Schools/Programs.
- 2) Establish clear guidelines for the selection of Model C Schools/Programs.
- 3) Require SED to review, monitor, and approve all applications for all programs seeking regulatory relief.
- 4) SED involve teacher consultant teams from all content areas in the evaluation of programs seeking relief from Commissioner’s Regulations 100.3 and 100.4, regardless of educational or integration program.

B) The lack of clear teacher certification requirements under alternative program proposals.

- 1) What implication does the “sunset” provision have on courses that districts propose to integrate into other courses?
- 2) What certification will be required to teach an “integrated” or standards based course as identified under scenario C.4?

NYSTEA believes that only certified teachers can provide adequate instruction of learning standards in their content area and that any “integrated” program be required to provide common planning time and/or a team teaching approach. NYSTEA expects that only certified Technology teachers will be teaching the Technology standards in any configuration, integrated or otherwise.

C) The lack of a consistent method for measuring student achievement.

- 1) What degree of validity and reliability is there in a checklist?
- 2) Can a checklist accurately measure the level or degree of student achievement?
- 3) What type of accountability is there for checklist accuracy and who is accountable?
- 4) Will the results be added to the school report card to provide the public information? (“Winning compliance” idea usually includes performance-based regulations and publishing lists of non-compliers.)

NYSTEA believes that until SED can assure that there is a formal agreed upon form of assessment that the State should not allow schools to figure it out on their own through regulatory relief. If the State believes that testing is the best method of measuring student achievement, then all standards should be tested. If there is another accurate method of measuring achievement, then shouldn't all standards be eligible to be measured using that method?

D) The lack of consistent use of or a clear definition for the term “integration”.

NYSTEA recommends that the State provide a specific definition for integration. Curriculum integration takes on many forms that reflect different levels or degrees of implementation, and which may be defined differently depending on the source of the information. The State needs to adopt one set of terms and design options, which accurately and specifically describe the various levels of curriculum integration, to allow for effective and efficient communication between and among teachers, disciplines, and institutions.

NYSTEA will continue to be a proactive partner in middle-level reform and commits to:

- Participate on SED committees/teams for evaluation, approval and assessment of applications for Model C programs or programs seeking regulatory relief.
- Collaborate with AIS and other teachers to create high interest material for study in Technology education that addresses both AIS needs and meets the requirements for Technology education instruction.
- Provide quality professional development opportunities to improve Technology Education teaching practices and programs with a focus on providing additional support to the Big Five School Districts.
- Recruit new teachers into the field of Technology education.
- Participate in the evaluation of Technology teacher certification tests.
- Revise and update curriculum to better align with State standards and to include newer technologies such as biotech and nanotech topics and activities.

Thank you for your time and consideration. NYSTEA stands ready to assist SED in any way necessary to improve middle-level education. Please contact me if I can be of further assistance.

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