





THE STATE EDUCATION DEPARTMENT / THE UNIVERSITY OF THE STATE OF NEW YORK / ALBANY, NY 12234

TO: The Honorable Members of the Board of Regents

FROM: James N. Baldwin 

SUBJECT: Proposed Amendment of Sections 52.21 and 80-4.3 of the Regulations of the Commissioner of Education Relating to Extensions for Coordinators of Work-Based Learning Programs

DATE: April 6, 2023

AUTHORIZATION(S): 

SUMMARY

Issue for Decision (Consent)

Should the Board of Regents adopt the proposed amendment of sections 52.21 and 80-4.3 of the regulations of the Commissioner of Education relating to extensions for coordinators of work-based learning programs?

Reason(s) for Consideration

Review of policy.

Proposed Handling

The proposed amendment is submitted to the Full Board for adoption as a permanent rule at its April 2023 meeting. A copy of the proposed amendment is attached (Attachment A).

Procedural History

The proposed amendment was presented at a joint meeting of the Higher Education and P-12 Education Committees for discussion at its December 2022 meeting. A Notice of Proposed Rule Making was published in the State Register on December 28, 2022, for a 60-day public comment period. Following the 60-day public comment period required under the State Administrative Procedure Act, the Department received two comments on the proposed amendment. An Assessment of Public Comment is included (Attachment C). No changes to the proposed amendment are recommended at this time. A Notice of Adoption will be published in the State Register on May 3, 2023. Supporting materials are available upon request from the Secretary to the Board of Regents.

Background Information

There are currently two types of extensions for coordinators of work-based learning programs which focus on the different types of programming coordinated by the certificate holder.

- Educators who hold the **Coordinator of Work-Based Learning Programs for Career Awareness extension** can coordinate programs for career awareness, such as providing extended shadowing experiences, the General Education Work Experience and Career Exploration Program (GEWEP), and the Work Experience and Career Exploration Programs (WECEP). For their base certificate, they must hold an Initial, Emergency COVID-19, Professional, or Permanent teacher certificate at the middle childhood education, adolescence education, or K-12 levels, or they must hold a Provisional or Permanent School Counselor certificate (8 NYCRR 80-4.3(e)).
- Educators who hold the **Coordinator of Work-Based Learning Programs for Career Development extension** can coordinate programs for career development, such as the Cooperative Occupation Education Work Experience Program (COOP)¹, the Career Exploration Internship Program (CEIP), and internship and youth apprenticeship/pre-apprenticeship programs. For their base certificate, they must hold an Initial, Emergency COVID-19, Professional, or Permanent certificate in a career and technical education title or an Agriculture, Business and Marketing, Computer Science, Family, and Consumer Sciences, or Technology Education certificate (8 NYCRR 80-4.3(f)).

The coursework requirement for both extensions is six semester hours in developing, implementing, coordinating, and evaluating work-based learning experiences and programs. These semester hours may be completed as part of a New York State registered program that leads to the extensions for coordinators of work-based learning programs. The experience requirement, however, is different for the two extensions, with the Coordinator of Work-Based Learning Programs for Career Awareness extension requiring 300 clock hours of work experience outside of classroom teaching and the Coordinator of Work-Based Learning Programs for Career Development extension requiring 600 such hours.

In May 2021, the Department assembled the Work-Based Learning Content Advisory Panel (CAP) as part of New York State's Perkins plan. The CAP is comprised of a cross-section of various stakeholders representing work-based learning programs that are offered by school districts and boards of cooperative educational services (BOCES). A list of current CAP members can be found in Attachment B. The CAP is tasked with reviewing and providing recommendations related to work-based learning

¹ This program is now called the Cooperative Career and Technical Education Work Experience Program (CO-OP).

policies, including the extensions for coordinators of work-based learning programs.

The CAP, as well as the New York State Work Experience Coordinators' Association, recommend streamlining the two extensions for coordinators of work-based learning programs in order to provide maximum benefits for districts, BOCES, and the field of work-based learning as a whole. Specifically, they recommended consolidating the two extensions into one extension that would enable educators to coordinate a wider range of work-based learning programs.

The CAP also recommended that the base certificate requirement for this new, single extension for coordinators of work-based learning programs be the same as the base certificate requirement for the Coordinator of Work-Based Learning Programs for Career Awareness extension, which includes a broader range of certificate titles than the base certificate requirement for the Coordinator of Work-Based Learning Programs for Career Development extension.

Additionally, there is an increased demand for work-based learning opportunities in districts and BOCES. Many districts and BOCES have experienced difficulties in finding qualified educators to serve as coordinators of work-based learning programs. With New York's Perkins V State plan now having a program quality indicator that all students in NYSED-approved programs complete at least 54 hours of work-based learning, it is critical that New York maintains a sufficient number of work-based learning coordinators to meet this need. The availability of the CDOS (Career Development and Occupational Studies) Commencement Credential to all students and as a graduation pathway has also increased the demand for work-based learning opportunities in schools. Career and technical education remain a persistent statewide shortage area, which further reduces the pool of teachers who are eligible for the Coordinator of Work-Based Learning Programs for Career Development extension.

Proposed Amendments

The Department proposes to create a new uniform "Coordinator of Work-Based Learning Programs" extension that would replace the two current extensions described above. The proposed new extension will permit holders to coordinate extended shadowing experiences, CO-OP, CEIP, GEWEP, and internship and youth apprenticeship/pre-apprenticeship programs.² These work-based learning programs are the combined programs that holders of the two current extensions may coordinate. WECEP programs are not included as they no longer exist.

The proposed extension will also have the same base certificate, coursework, and experience requirements as the Coordinator of Work-Based Learning Programs for Career Awareness extension, with some revisions. The revisions include removing references to Provisional teaching certificates that no longer exist and adding Initial and Professional School Counselor certificates that become effective February 2, 2023, as eligible certificates for the base certificate requirement.

² CO-OP and youth apprenticeship/pre-apprenticeship programs must be supervised in coordination with a teacher certified in the content area in which the placement takes place.

The registration requirements for programs leading to a coordinator of work-based learning programs extension as outlined above would not change; specifically, at least six semester hours of coursework in developing, implementing, coordinating, and evaluating work-based learning experiences and programs (8 NYCRR 52.21(b)(4)(vi)). However, the proposed rule indicates the types of base certificates for the extension and updates the description of the extension for the coordination of work-based learning programs to reflect the single extension in the registration requirements. The proposed amendment will not require institutions that have registered programs leading to a coordinator of work-based learning programs extension to revise their programs.

Related Regents Items

December 2022: [Proposed Amendment of Sections 52.21 and 80-4.3 of the Regulations of the Commissioner of Education Relating to Extensions for Coordinators of Work-Based Learning Programs](https://www.regents.nysed.gov/common/regents/files/1222hep12d1.pdf)

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Recommendation

It is recommended that the Board of Regents take the following action:

VOTED: That sections 52.21 and 80-4.3 of the Regulations of the Commissioner of Education be amended, as submitted, effective May 3, 2023.

Timetable for Implementation

If adopted at the April meeting, the proposed amendment will become effective on May 3, 2023.

Attachment A

AMENDMENT TO THE REGULATIONS OF THE COMMISSIONER OF EDUCATION

Pursuant to sections 101, 207, 208, 305, 308, 3001, 3004, and 3009 of the Education Law.

1. Subparagraph (vi) of paragraph (4) of subdivision (b) of section 52.21 of the Regulations of the Commissioner of Education is amended to read as follows:

(vi) Programs leading to extensions for classroom teaching certificates in any title at the middle childhood education, adolescence education, or all grades levels or for provisional, permanent, initial, or professional certificates in the school counselor title to authorize coordination of work-based learning programs [for career exploration or to authorize coordination of discipline-specific and diversified work-based learning programs for career development] shall require study of at least six semester hours in developing, implementing, coordinating, and evaluating work-based learning experiences and programs.

2. Subdivision (e) of section 80-4.3 of the Regulations of the Commissioner of Education is amended to read as follows:

(e) Requirement for the extension in coordinator of work-based learning programs [for career awareness].

(1) The extension shall authorize the candidate to coordinate work-based learning programs [for career awareness], such as programs providing extended shadowing experiences, the General Education Work Experience and Career Exploration Program (GEWEP), [and the Work Experience and Career Exploration Program (WECEP)] the Cooperative Career and Technical Education Work Experience

Program (CO-OP), the Career Exploration Internship Program (CEIP), and internship and youth apprenticeship/pre-apprenticeship programs; provided that CO-OP and youth apprenticeship/pre-apprenticeship programs shall be supervised in coordination with a teacher certified in the content area in which the placement takes place.

(2) The candidate shall meet the requirements in each of the following subparagraphs:

(i) The candidate shall hold a valid [provisional,] permanent, initial, emergency COVID-19, or professional certificate [for] in the classroom teaching service in any title [in] at the middle childhood education [including students with disabilities (5-9)], [any title in] adolescence education [including students with disabilities (7-12)], or [any title in (K-12)] all grade levels; or a valid provisional [or], permanent, initial, or professional certificate in the title school counselor [(Pre-K-12)].

(ii) ...

(iii) ...

3. Subdivision (f) of section 80-4.3 of the Regulations of the Commissioner of Education is REPEALED and subdivision (g) through subdivision (t) is relettered subdivision (f) through subdivision (s).

Attachment B**List of Work-Based Learning Content Advisory Panel Members**

Last Name	First Name	Title	Organization
Reid	Sharon	Director of Internships and Experiential Learning	Borough of Manhattan Community College
McKain	Antoinette	Director of Evening/Weekend and Off-Site Programs	Borough of Manhattan Community College
Christopher	Robin	Associate Director, Institutional Planning & Evaluation	Bronx Educational Opportunity Center
Mead	Angel	WBL Coordinator	Broome-Tioga BOCES
Tryt	Nicole	WBL Coordinator	Broome-Tioga BOCES
Sheehan	Matt	Principal	Broome-Tioga BOCES - Center for Career and Technical Excellence
Miklas	Amy	Supervisor-Career and Technical Education	Buffalo CSD
Frazier	Stephen	Teacher - Hutchinson Tech	Buffalo CSD
Harris	Rob	Director of Career and Technical Education	Buffalo CSD
Gubing	Sue	WBL Instructor	Buffalo State College
Ryan	Joanne	Past President, NYSACTE	Buffalo State College
Dragone	Joe	Senior Executive Officer	Capital Region BOCES
Haas	James	WBL Coordinator	Capital Region BOCES
Palmer	Jeff	Director of Career and Technical Education	Capital Region BOCES
Fox	Karen	Director of Educational Initiatives	Capital Region Chamber
Phelps	Jennifer	Agriculture Educator (WBL/SAE)	Carthage Senior High School
Refki	Dina	Executive Director	Center for Women in Government & Civil Society - The Nontraditional Employment & Training (NET) Program- SUNY
Nwoke	Godfrey	Professor	Department of Career and Technology-CUNY
DeSiato	Donna	Superintendent	East Syracuse Minoa CSD (NYCOSS)
Sharma	Pamela	WBL Coordinator and CTE teacher	Edison CTE HS

Leteste	Rob	Assistant Project Director, Perkins Grant	Erie Community College
Hoodak	Sandy	WBL Coordinator	Fairport HS
MacDonald	Kevin	BOCES District Superintendent	Genesee Valley Educational Partnership (NYCOSS)
Ayouch	Karen	Director of Institutional Research	Herkimer Community College
DiMezza	Michael	Principal of CTE	HFM BOCES
Stretkowicz	Rebecca	President, NYSACTE	HFM BOCES
Pepenella	Gerry	CTE teacher	Hillcrest HS
Hill	Penny	Workforce Development Chairperson	HVCC
O'Driscoll	John	Business Manager	IBEW Local 110 Watertown
Ekanger	Holger	Vice President, Workforce Readiness	Jamestown Community College
Fulkerson	Randy	WBL Coordinator	Jeff-Lewis BOCES
Thomas	Pamela	WBL Coordinator	Jeff-Lewis BOCES
Zbrzenzy	Patrycja	Assistant Principal- Agriculture Department (WBL/SAE)	John Bowne High School
Carrigan	Tom	Union Representative	Local 7 Plumbers and Steamfitters
Marra	Ida	WBL Coordinator	Rochester City School District
Mack	Melinda	Executive Director	New York Association of Training & Employment Professionals (NYATEP)
Hebert	Leah	Director of Intergovernmental Programs and Partnerships	New York City
Shearer	Kristen	VP Directors and Supervisors	New York State School Counselor Association
Romano	Linda	Health Occupations/Nurse Aide Teacher	Newburgh Enlarged City School District
Lucchetto	Chrisann	Senior Director of Policy and Accountability	NYC DOE
Jardine	Desmond	Work-Based Learning Manager	NYCDOE
Weeks	Takiyah	Director of Career Readiness, Grades 9-14 Early College & Career Schools	NYCDOE
Wilson	Emily	WBL Coordinator	NYCDOE
Rangel	Amber	Director, Workforce Development	NYS Business Council

Aurora	Jill	Workforce/Education Partnership Coordinator	NYS Dept. of Labor
White	Christopher	Associate Commissioner for the Future of Work	NYS Dept. of Labor
Abrahams	Orville	Deputy Commissioner	NYSDOL
Myers	Christopher	Manager, Program Development Office	NYSDOL
Deo	Juie	Supervisor, Youth Office	NYSDOL
Paris	Dan	Field Specialist for trades	NYSDOL
Bromerski	Tim	Director, Bureau of Education and Transition Services	OCFS
Conti	Debbie	Workforce Program Specialist	OCFS
Trask-Huggins	Patricia	WBL Coordinator	Orange Ulster BOCES
Balestrieri	Catherine	Director of Career and Technical Education	Putnam/Northern Westchester BOCES
Crea	Melissa	Work-Based Learning Coordinator	Putnam/Northern Westchester BOCES
Fernandez-Palozzi	Denise	CTE Director	Questar III BOCES
Nelson	Sylvie	Executive Director	REDC
Williams	Brian	Commissioner	Rensselaer County Employment & Training
Leavens	Douglas	Executive Director	Saratoga-Warren-Washington Workforce Development Board
Bargy	Jen	Director of Workforce Development	Schenectady County Job Training Agency
Jennings	Garrett	WBL Coordinator	Southern Westchester BOCES
Smith	Erin	Agriculture Educator (WBL/SAE)	StockBridge Valley High School
Lansing	Jill	Assistant Vice Chancellor for the Education Pipeline	SUNY Administration
Marshall	Katie	Director	SUNY Erie One Stop Center
Torres-Diaz	Madeline	AVP for Student Engagement and Completion	SUNY Orange Community College
Bisignano	Joe	WBL Instructor/professor	SUNY Oswego
Wege-Beers	Petra	Director of Career & Internship Services	SUNY Ulster

Olaizola	Julio	ATTAIN Project Manager	SUNY University Center for Academic and Workforce Development
Hall	Earl	Executive Director	Syracuse Builders Exchange
Matteson	Jeff	BOCES District Superintendent	Tompkins-Seneca-Tioga BOCES (NYCOSS)
Roberson	Sterling	Vice President for Career and Technical Education High Schools	United Federation of Teachers (UFT)
Smith	Chandra	Director, Grant Associates	Vendor (NYC)
Trail	Saskia	CEO ExpandEd	Vendor (NYC)
McNeill	Laurie	Director of Institutional Advancement	Westchester Community College
Grafstein	Mary Pat	President	Work Experience Coordinator Association (WECA)
Grosso	Ulysses	Director	WorkForce 1 Career Centers for Manhattan and Staten Island
Cullen	Dan	Director of Field Services	Workforce Development Institute
Thomas-O'Dell	Crickett	Regional Director	Workforce Development Institute
Tarullo	Tracy	CTE Guidance Counselor	WSWHE BOCES
Sylvester	Nadine	Coordinator of Internships	Year Up Program

ASSESSMENT OF PUBLIC COMMENT

Since publication of the Notice of Proposed Rule Making in the State Register on December 28, 2022, the State Education Department (Department) received the following comments on the proposed amendment:

1. COMMENT: The commenter asked if applicants for the work-based learning program coordinator extension need to complete 300 or 600 clock hours of non-school-based work experience and if this clock hour requirement is dependent upon their previous pathway.

DEPARTMENT RESPONSE: Currently, the experience requirement for the Coordinator of Work-Based Learning Programs for Career Awareness extension is 300 clock hours of work experience outside of classroom teaching, and the experience requirement for the Coordinator of Work-Based Learning Programs for Career Development extension is 600 hours. The proposed amendment creates a new uniform “Coordinator of Work-Based Learning Programs” extension that would replace the two current extensions. The new extension will have the same experience requirement as the Coordinator of Work-Based Learning Programs for Career Awareness extension, which is 300 clock hours of work experience outside of classroom teaching. No changes to the proposed regulation are necessary.

2. COMMENT: The commenter does not support the proposed amendment because they believe that reducing requirements for work-based learning coordinators are not the way to make programs stronger and increase interest in this field. The commenter shared that they hold the Coordinator of Work-Based Learning Programs for Career Development extension and demonstrated 600 clock hours of work experience outside of a classroom

setting to obtain the extension. They feel that 600 hours, or 15 weeks of work experience at 40 hours per week as they pointed out, is a minimal amount of workplace experience outside of the teaching profession. The commenter requests that the Department not reduce the requirements for work-based learning coordinators, thus showing that it values experience as well as knowledge as these coordinators prepare the future generation of workers.

DEPARTMENT RESPONSE: The proposed “Coordinator of Work-Based Learning Programs” extension will have the same experience requirement as the Coordinator of Work-Based Learning Programs for Career Awareness extension, which is 300 clock hours of work experience outside of classroom teaching. The Department believes that this amount of experience is sufficient to prepare educators to coordinate all registered work-based learning programs. For example, the CO-OP and youth apprenticeship/pre-apprenticeship programs, which are currently coordinated by educators who hold the Coordinator of Work-Based Learning Programs for Career Development extension, must be supervised in coordination with a teacher certified in the content area in which the placement takes place under the proposed extension, providing additional support and expertise for those programs.

It is important to note that the two current extensions and the proposed extension have the same coursework requirement. Additionally, individuals seeking this extension often struggle to document their hours of experience outside of classroom teaching because businesses often close/merge and they cannot get their hours verified. No changes to the proposed regulation are necessary.