Public Comments Template





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Submit Public Comments to the NY State Education Department (NYSED) in Support of Required Instruction in Climate Education

Submit by January 19, 2026

Read the Proposed Amendment Here

Send Via Email: REGCOMMENTS@nysed.gov

and/or

Send Via Snail Mail:

Santosha Oliver, Assistant Commissioner NYS Education Department Office of Standards & Instruction 89 Washington Avenue, Room 860 EBA Albany, NY 12234

Subject: In Support of Proposed Amendment of Section 100.2 of the Regulations of the Commissioner of Education to Require Instruction in Climate Education

To the P-12 Education Committee of the Board of Regents:

As a [student/educator/parent], I strongly endorse the Board of Regents' proposed amendment of section 100.2 of the Regulations of the Commissioner of Education to require instruction in climate education.

Today's students are tomorrow's workers, consumers, and voters, and they need to be equipped to cope with the challenges of their warming world by learning about climate change now.

In order to ensure that the amendment fulfills the goal of providing effective instruction in climate education, we suggest the following.

• With respect to the recommendation that instruction "be provided by the end of the last year of each grade band," we urge NYSED to encourage districts to provide climate change education *throughout* each band rather than at the end of each band. Waiting





until the end of the last year of each band may overlook the necessity of a spiraled educational model that is at the heart of successful student learning. The spiraled model revisits key concepts over time, deepening understanding and increasing topic complexity. As support, each grade level should be provided with interdisciplinary exemplars for climate change integration, with end of band grades responsible for a culminating project or assessment, providing teachers with multiple ways to approach climate education within the existing curriculum.

• NYSED should develop criteria for district verification. Clear verification criteria ensure that all students receive consistent, high-quality climate education, regardless of where they live. Clear criteria would allow NYSED to monitor compliance, identify gaps, and support districts in meeting their responsibilities. Beyond accountability, they would help schools assess and improve instruction by defining what successful implementation looks like. Transparent, public criteria also build trust, showing families and communities that the state is serious about accountability and educational quality.

Sincerely,

Name (specify if you are a student (include grade), or an educator (include what you teach, grades)
Address
City, State, Zip

CRETF NYSED Comments, 11-24-25





November 24, 2025

Santosha Oliver, Assistant Commissioner NYS Education Department Office of Standards & Instruction 89 Washington Avenue, Room 860 EBA Albany, NY 12234

Subject: In Support of Proposed Amendment of Section 100.2 of the Regulations of the Commissioner of Education to Require Instruction in Climate Education

To the P-12 Education Committee of the Board of Regents:

The National Wildlife Federation's Climate & Resilience Education Task Force (CRETF) strongly endorses the Board of Regents' proposed amendment of section 100.2 of the Regulations of the Commissioner of Education to require instruction in climate education specifically.

CRETF's Policy Committee has reviewed the proposed amendment and shares the following feedback:

Reevaluate Grade Band Language

• With respect to the recommendation that instruction "be provided by the end of the last year of each grade band," we believe that this requirement may encourage procrastination until the last year of the band or sporadic and uneven coverage within the band. Instead, each grade level should be provided with exemplars for climate change integration and end of band grades (4th, 8th, 12th) responsible for a culminating project or assessment. This will ensure a more even and vertically articulated educational model, allowing for revisiting key concepts over time, deepening understanding and increasing topic complexity.

Develop Criteria for District Verification

- New York's urban, suburban, and rural districts have varying resources and capacities.
 Clear verification criteria ensure that all students receive consistent, high-quality climate education, regardless of where they live. These criteria allow NYSED to monitor compliance, identify gaps, and support districts in meeting their responsibilities. Beyond accountability, they help schools assess and improve instruction by defining what successful implementation looks like.
- Transparent, public criteria also build trust, showing families and communities that the state is serious about accountability and educational quality.





For several years, CRETF's coalition, which includes hundreds of high school students participating in its Youth Steering Committee from across the state, have advocated for robust, interdisciplinary P-12 climate education across grades and content areas.

In a global survey of nearly 17,500 youth published by UNESCO in 2022, 91% of young people said they would like to have more climate change education in school. Their primary concerns and demands were about:

- The quality of current climate education
- The disconnect between what they learn about climate change and how they can take action
- The need for diverse aspects of climate change to be embedded across subjects

We recognize that implementation of the new climate education standards in New York will require dedicated funding. In the summer of 2024, we collaborated with NYSED on drafting relevant legislation (\$2430/A4876) and an initial budget request of \$536,500 to support the hiring of staff and consultants to execute work related to the new requirement. We have worked tirelessly, throughout 2024 and since September 2025, to persuade Governor Hochul to include this small fiscal request in her executive budget, including by sending her thousands of postcards signed by New York students, educators and everyday citizens.

Our Policy Committee is sharing the following additional feedback related to implementation aimed at ensuring that the initiative accomplishes its purpose.

Ensure Adequate and Consistent Funding for This Initiative

• Without consistent funding, this initiative will be another unfunded mandate. Unfunded educational mandates often fail by straining school budgets, forcing cuts to other programs, creating resource shortages (staff, facilities), increasing compliance costs, and leading to educational inequities, especially for less wealthy districts, ultimately hindering the intended educational goal. If NYSED is truly committed to climate education, it must plan for and champion continued funding not only to lay the groundwork for this initiative, but also to actively foster and support its growth throughout the state.

Establish Common Definitions for Climate Education

In New York State, school districts vary widely in how decisions are made. In larger districts, where decision-making authority is often centralized, superintendents and central office leaders make most key decisions about curriculum, instruction, budgeting, and policy. In smaller, more rural districts, schools and educators have more autonomy to make decisions.





Similarly, some educators and districts have been immersed in climate education; others have not and may face local opposition to the very term "climate change." Therefore, we need a common vocabulary to define what we mean by "climate education." For example: Climate education is the process of teaching and learning about the science, impacts, and mitigation and adaptation options for human-caused disruption of earth climate systems as well as the historical context, and social, economic, and ethical dimensions of the climate crisis. It aims to equip individuals and communities with the knowledge, skills, values, and motivation needed to understand and respond effectively to climate change.

Most importantly, more than 99% of climate scientists now agree—based on extensive research—that global warming is driven by human activity; and the U.S. National Academies of Sciences, Engineering, and Medicine (NASEM) released a report in September 2025 stating that the evidence for human-caused greenhouse gas (GHG) emissions harming human health and welfare is "beyond scientific dispute." The scientific consensus on climate change should be unequivocally reflected within the state school system.

Do Not Conflate Climate Education and Environmental Education

• Although climate education and environmental/sustainability education are connected and often overlap, they focus on different core goals and types of understanding. Climate education is about understanding Earth's climate systems, which includes (as a matter of urgency) understanding what humans are doing to alter it and how we can respond effectively. Environmental education covers a broader range of topics about the natural and urban environments, resource conservation, ecosystems, and human interactions with nature. When climate education is "absorbed" into environmental/sustainability education, the science and the urgency of climate change can get diluted. Climate education needs to be addressed separately and with the urgency that the ongoing climate crisis demands.

Developmentally Appropriate P-12 Interdisciplinary Infusion Across Grade Levels

- Developing interdisciplinary exemplars for P–12 grade bands (e.g. for Science, Social Studies ELA, Art, and Math) especially for teachers, schools and districts who have not been immersed in climate education, will ensure that content is cohesive, place based, age-appropriate, and connected across subjects. Exemplars would help teachers integrate complex climate topics into existing curricula while building students' understanding progressively from early grades through high school. Ideally, exemplars would demonstrate how climate education can be used to teach existing standards in a way that replaces rather than adds to existing curriculum. The BOCES could play a large role in providing this quidance to districts.
- While developing exemplars are essential, infusing climate education into existing standards reinforces interdisciplinary learning, and uses time efficiently.





- Creating standalone courses allows deeper, more focused study and signals the subject's importance, yet can strain already packed schedules and isolate the topic.
- In New York State, a hybrid approach—embedding climate learning in early grades and
 offering dedicated courses in high school—could balance coherence, depth, and
 practicality. It would be important for NYSED to provide guidelines on how to design such
 courses, and to share whether it is leaning in any particular direction vis a vis infusion vs.
 standalone courses.

Ensure That Climate Instruction Includes a Social-Emotional Component and a Focus on Solutions

- Raising healthy, hopeful children necessitates a social-emotionally informed climate change education, because young people are already aware of the climate crisis and may already be experiencing climate anxiety, as shown in <u>Hickman et al.'s global survey</u>. In their study of 10,000 16–25-year-olds across 10 countries, over half reported emotions like sadness, powerlessness, guilt, and more than 45% said those feelings negatively affect their daily functioning.
- Social emotional learning (SEL) can help students process emotions, build coping skills, and develop a sense of agency. An October 2024 study on <u>Climate emotions, thoughts</u>, and plans among <u>US</u> adolescents and young adults found that:
 - Although a range of current societal stressors may affect youth mental health, evidence indicates that climate change is among the most important.
 - Representative survey data in the USA has identified climate change as a top concern among youth along with gun violence and economic concerns.
- Research also shows that solutions-based climate education can counter feelings of anxiety by helping students focus on practical actions, which in turn builds a sense of efficacy and hope about the future.

Consider a Seal of Climate Literacy to Demonstrate Knowledge Acquisition

- Using <u>Lyra Colorado's climate literacy seal</u> as a model, with modifications for P-12 grade bands, and interdisciplinarity, we propose developing criteria for demonstration of knowledge acquisition and consider a seal of climate literacy upon completion of either an assessment, delivery of an assignment or project, or a capstone project (for high school).
- Alternatively, the new instructional requirement in climate education could augment/be added to the existing Seal of Civic Literacy for civic action projects that include a climate theme.





Use Seasoned Climate Educators and NGOs for Sustained In-Service Professional Learning

- NYSED could develop an ecosystem of trainers. CRETF could help compile this list and serve as a connector. There are many groups around the state, including nonprofits, museums, and consultants, that are already doing this work.
- NYSED could establish a designated number of professional development hours/Continuing Teacher and Leader Education (CTLE) in climate education for all in-service teachers. Research shows that most teachers need support to effectively teach about climate change, particularly those outside the sciences or new to interdisciplinary approaches. Professional learning should engage P–12 educators across all subjects in exploring climate causes, impacts, and solutions through teacher-led, student-centered methods. In collaboration with teacher, superintendent, principal unions and organizations and content partners, We suggest an initial series of standardized trainings across the state followed by sustained trainings over time in each district.
- As outlined in <u>CRETF's platform</u>, NYSED should establish both a timeline for professional learning and educator readiness in accordance with <u>New York State's decarbonization</u> goals, and a plan for ongoing teacher support, peer exchange, and evaluation.
- CRETF and our coalition partners propose creating skilled teacher teams from across the state to collaboratively develop exemplars and professional learning modules for each grade band. Many New York teachers are already passionate leaders in this work. These roles could serve as paid green jobs or residencies/lead or model teacher opportunities for experienced educators supporting the new initiative.

Pre-Service Teacher Training is Needed

- Climate change education should be included in the accreditation of all New York State teacher and administrator certification programs so that teachers entering P-12 classrooms are climate-ready.
- SUNY campuses could become hubs of learning, teacher preparation and professional development, as well as showcases for existing university coursework and research specialization related to climate change and related sciences. SUNY offers at least 5 distinct courses which explicitly address climate change. But none of the sources clearly identify these as pre-service teacher certification courses (i.e., targeted for teacher preparation programs). Similarly, CUNY has at least 2–3 distinct offerings (courses/programs) addressing climate change. However, none are clearly labelled as pre-service teacher certification courses either.
- STEMTeachersNYC's climate change microcredential, now entering its third year, could be
 used as a model to establish SUNY and/or CUNY-wide microcredentials that leverage
 existing courses across schools and degree programs, as well as local nonprofits
 experienced in climate change research and education.





Showcase Success and Provide Consistent Opportunities for Engagement

- In the first year of implementation, it will be important to showcase early adopters and
 capture stories of where climate education is happening well. Teacher and student success
 stories and process strategies should be collected in video and other mediums and
 posted on a central learning archive. Ideally, these could be shared in NYSED, NYSUT and
 AFT newsletters, at meetings of the Board of Regents, professional associations, and at an
 annual state-sponsored conference or institute.
- There are many existing <u>existing resources</u> and documents that have had input from educators working across the field, and that showcase success stories. Many of these are highlighted at <u>cretf.org/teacher-resources</u>.

Establish Communication Channels With Stakeholders

• NYSED should establish regular forums and mechanisms for feedback on progress and implementation. These should be accessible, inclusive (digital and non-digital, multilingual, disability-friendly). Stakeholders may include but not be limited to: the Board of Regents, NYSED, higher education partners, New York State Energy Research and Development Authority (NYSERDA), the NYS Department of Labor, labor and community-based organizations, NGOs and relevant educational service providers, environmental justice and climate justice organizations, informal education institutions such as museums, zoos and aquariums, and green workforce development and private sector partners.

Prepare Now. Regional BOCES Can Support District Development and Rollout

- Preparing now for the 2027–28 climate education requirement ensures that by the time it's
 implemented, teachers are trained, curricula are ready, resources are available, and every
 student has access to engaging, high-quality instruction. Early planning turns a policy
 mandate into a meaningful educational opportunity.
- BOCES can be utilized as a regional nexus by serving as a primary partner in helping districts interpret NYSED guidance and developing/co-developing interdisciplinary P-12 exemplars.
- BOCES can provide sustained and specific professional development and assist in capacity building.
- BOCES can be engaged to assist schools in accessing aid for climate education professional development.
- Each BOCES can also assist or lead in the collaboration with seasoned climate educators, NGOs, museums, and higher education partners to offer CTLE-aligned training, facilitate peer exchange, support SEL-informed instruction, and help districts prepare for the 2027–28 rollout.
- BOCES can help ensure implementation is consistent, while regionally tailored, by serving as an operational bridge between NYSED and local districts.





We have prepared a more comprehensive supplement about this topic that will be shared once the proposed amendment is approved.

It should be noted that in November 2025, at the 30th Conference of the Parties (COP) in Brazil, during a high level meeting on climate education, two priority areas emerged: <u>climate literacy for teachers and the development of skills and technical training for young people</u>.

Simultaneously, the European Union pledged to 'embed climate education across formal education, vocational training and lifelong learning systems' as part of its 2025 Nationally Determined Contribution (NDC) to the Paris Agreement. New York is now moving to take its place in this global effort.

Sincerely,

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