

## Proposed Regulation Changes Fall 2018

# #104

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Friday, October 12, 2018 8:56:13 AM  
**Last Modified:** Friday, October 12, 2018 9:00:23 AM  
**Time Spent:** 00:04:09  
**IP Address:** 174.70.0.77

Page 1

**Q1** Which of the following best describes your role in education?

Other (please specify):

School Nurse Teacher

**Q2** If you support the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding what you support.

Respondent skipped this question

**Q3** If you have concerns with the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding your concerns.

Dear committee members,

I am respectfully writing to you regarding the proposed changes to the RIDE regulations governing the certification of educators in Rhode Island, specifically section: J. All grades School Nurse Teacher Certification found on page 115. I have been a certified school nurse teacher for 3 years having only the preliminary certification at this time. I am proud to say that I have just completed the 8 courses required for the School Nurse Teacher Certification in the state of RI. Having just passed the PRAXIS, I will be submitting all the necessary materials in the spring for the official School Nurse Teacher Certification. It is important to share with the committee that while I have over 20 years experience as a Registered Nurse, I would consider myself a NEW educator. As a new educator, I am truly taken aback that the Rhode Island Department of Education is considering removing the educational component of this requirement. What message does this send?

This coursework has provided the necessary foundation that allows the registered nurse to effectively take care of not only the students in our schools, but staff, and families as well. I can honestly say that this education has provided a pathway to allow me to effectively bridge that gap between the medical issues and the educational needs of our student body. It is wonderful to be able to confidently marry the two within the school setting.

I ask that you reconsider changing these regulations as this sends a message that you are lowering the standards that are necessary to effectively provide care to our most vulnerable population.

Sincerely,  
Lisa Dansereau, RN  
School Nurse Teacher

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#105

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Friday, October 12, 2018 9:48:49 AM  
**Last Modified:** Friday, October 12, 2018 9:56:00 AM  
**Time Spent:** 00:07:11  
**IP Address:** 199.184.247.133

Page 1

**Q1** Which of the following best describes your role in education?

**PK-12 Support Professional**

**Q2** If you support the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding what you support.

Respondent skipped this question

**Q3** If you have concerns with the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding your concerns.

School nurse Certification- I oppose eliminating school nurse teacher certification. CSNT are the only medical professionals in a school. We serve students, staff and parents. We are often the link between home and school. The school community deserves highly educated and highly qualified health professionals. I realize that saving money is probably the motivation behind this change but you will not find highly educated, qualified, reliable nurses for half the money you pay now.

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**Q4** Comments regarding: Early Childhood Education (5025) - Cut Score 156

Respondent skipped this question

Proposed Regulation Changes Fall 2018

#106

INCOMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Friday, October 12, 2018 9:41:29 AM  
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**Time Spent:** 00:16:41  
**IP Address:** 199.184.247.133

Page 1

**Q1** Which of the following best describes your role in education?

Other (please specify):  
School Nurse teacher

**Q2** If you support the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding what you support.

Respondent skipped this question

**Q3** If you have concerns with the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding your concerns.

Registered School nurse teacher-page 105

Students in Rhode Island deserve health services from highly qualified and educated nurses. Undergraduate nursing courses do not prepare one for the practice of school setting. Being the only medical professional in the school building we need school nurse course work to prepare us for that role.

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**Q4** Comments regarding: Early Childhood Education (5025) - Cut Score 156

Respondent skipped this question

Proposed Regulation Changes Fall 2018

#107

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Friday, October 12, 2018 9:49:55 AM  
**Last Modified:** Friday, October 12, 2018 10:52:37 AM  
**Time Spent:** 01:02:41  
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Page 1

**Q1** Which of the following best describes your role in education?

**PK-12 Teacher**

**Q2** If you support the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding what you support.

**Respondent skipped this question**

**Q3** If you have concerns with the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding your concerns.

Change in school nurse teacher certification pgs 105-106

I oppose the proposed changes to certification.

Students deserve health service from highly qualified and highly educated nurses. The course work prepares nurses to link home-school-medical worlds so all students can succeed.

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**Q4** Comments regarding: Early Childhood Education (5025) - Cut Score 156

**Respondent skipped this question**

Proposed Regulation Changes Fall 2018

#108

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Friday, October 12, 2018 10:15:12 AM  
**Last Modified:** Friday, October 12, 2018 11:02:45 AM  
**Time Spent:** 00:47:32  
**IP Address:** 199.184.247.133

Page 1

**Q1** Which of the following best describes your role in education?

**PK-12 Support Professional,**  
Other (please  
specify):  
School Nurse Teacher

**Q2** If you support the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding what you support.

Respondent skipped this question

**Q3** If you have concerns with the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding your concerns.

BSN's are not trained to practice in the school setting. Undergraduate courses do not provide such exposure. The School Nurse Teacher is a specialized area. We are the only medical professional in the school. The coursework we have been required to take has prepared us for this specialized role. This coursework prepares us to link the home, school and medical worlds so all students can succeed. Our students deserve health services from highly qualified, highly educated nurses

Page 2

**Q4** Comments regarding: Early Childhood Education (5025) - Cut Score 156

Respondent skipped this question

Proposed Regulation Changes Fall 2018

#109

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Friday, October 12, 2018 11:12:44 AM  
**Last Modified:** Friday, October 12, 2018 11:25:54 AM  
**Time Spent:** 00:13:10  
**IP Address:** 199.184.247.133

Page 1

**Q1** Which of the following best describes your role in education?

**PK-12 Support Professional,**  
Other (please  
specify):  
School Nurse Teacher

**Q2** If you support the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding what you support.

Respondent skipped this question

**Q3** If you have concerns with the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding your concerns.

Registered Nurses's are not trained to practice in the school setting.

The coursework prepares the School Nurse Teacher to link the home, school and medical worlds so all students can succeed....students deserve health services from highly qualified, highly educated nurses.

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**Q4** Comments regarding: Early Childhood Education (5025) - Cut Score 156

Respondent skipped this question



## Proposed Regulation Changes Fall 2018

# #110

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Friday, October 12, 2018 10:26:22 PM  
**Last Modified:** Friday, October 12, 2018 10:29:25 PM  
**Time Spent:** 00:03:02  
**IP Address:** 187.136.155.100

Page 1

**Q1** Which of the following best describes your role in education?

**PK-12 Teacher**

**Q2** If you support the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding what you support.

Respondent skipped this question

**Q3** If you have concerns with the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding your concerns.

I have concerns with the PD requirement, as it seems that the onus of it will fall on teachers, especially payment. In what other profession do people need to pay for course work that will enhance the company's outcomes? NONE

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**Q4** Comments regarding: Early Childhood Education (5025) - Cut Score 156

it's fine

## Proposed Regulation Changes Fall 2018

# #111

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Sunday, October 14, 2018 5:27:39 PM  
**Last Modified:** Sunday, October 14, 2018 5:42:15 PM  
**Time Spent:** 00:14:36  
**IP Address:** 72.200.155.142

Page 1

**Q1** Which of the following best describes your role in education?

**Educator Preparation Program Faculty or Administrator**

**Q2** If you support the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding what you support.

Respondent skipped this question

**Q3** If you have concerns with the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding your concerns.

Expert Residency - Cultural Competence (pp. 76-77) in particular section 5B. This described requirement is extremely vague with no tangible definition or description of the type of evidence/documentation that would clearly demonstrate the qualifications of the candidate or how this evidence would act as an indicator of future success. The described process would not necessarily measure a candidate's level of cultural competence which is a continuously evolving and nuanced discipline. This is further compounded by the fact that the certification is for a three(3) years period with minimal to no evaluation of the candidate's effectiveness or tangible metrics to measure impact during this initial 3-year period..

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**Q4** Comments regarding: Early Childhood Education (5025) - Cut Score 156

Respondent skipped this question



## Proposed Regulation Changes Fall 2018

# #112

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Monday, October 15, 2018 8:10:33 AM  
**Last Modified:** Monday, October 15, 2018 8:16:13 AM  
**Time Spent:** 00:05:39  
**IP Address:** 192.133.12.250

Page 1

**Q1** Which of the following best describes your role in education?

Other (please specify):  
School Nurse Teacher

**Q2** If you support the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding what you support.

Respondent skipped this question

**Q3** If you have concerns with the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding your concerns.

Concern over changing School Nurse Teacher Certification pathway. School Nursing is an independent specialty in nursing with so many layers (health education, medical services, running a health office, psychosocial services, staff education, community and public health and safety, program coordination, health curriculum creation, lesson planning, keeping up with rules and regs.. etcc....(without proper education the RN will NOT BE PREPARED to properly serve as a school nurse and the entire school community will be at risk!!! I do not support this initiative!

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**Q4** Comments regarding: Early Childhood Education (5025) - Cut Score 156

Respondent skipped this question

#113

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Monday, October 15, 2018 9:09:04 AM  
**Last Modified:** Monday, October 15, 2018 10:46:51 AM  
**Time Spent:** 01:37:47  
**IP Address:** 199.184.247.133

Page 1

**Q1** Which of the following best describes your role in education?

**PK-12 Teacher**

**Q2** If you support the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding what you support.

**Respondent skipped this question**

**Q3** If you have concerns with the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding your concerns.

Nurses are not trained to practice in the school setting.

Undergraduate courses do not provide such exposure during Nursing school. The school nurse teacher is the only medical professional in the school setting which requires additional education in order to provide the best student services. We need the coursework to prepare us for that important role. Coursework prepares us to link the home, school, and medical worlds so all students can succeed. Students deserve health services from highly qualified, highly educated nurses.

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**Q4** Comments regarding: Early Childhood Education (5025) - Cut Score 156

**Respondent skipped this question**

#114

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Monday, October 15, 2018 12:22:19 PM  
**Last Modified:** Monday, October 15, 2018 12:29:29 PM  
**Time Spent:** 00:07:10  
**IP Address:** 131.128.72.85

Page 1

**Q1** Which of the following best describes your role in education?

**Educator Preparation Program Faculty or Administrator**

**Q2** If you support the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding what you support.

Respondent skipped this question

**Q3** If you have concerns with the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding your concerns.

My major concern is your mention that, "the achievement gap for Hispanic/Latino students is wider in Rhode Island than anywhere else in the country," yet, we are considering reducing the minimum training teachers need to earn an ESL/BDL certification.

Our English Learners are in greatest need of our strongest teachers, but this reduction in rigor and requirements will mean this population will be short-changed by the state's concerns with fast-track compliance.

Please know that I am very supportive in alternative pathways to certification, but there are two major factors that have me concerned about these pathways for Rhode Island teachers:

Unlike our neighboring states (i.e. CT, MA, NY), Rhode Island teachers do not need to earn a master's degree to renew their teaching certifications, and the majority of Rhode Island teachers have reported via SurveyWorks that they are highly unsatisfied with current "in house" professional development, yet in house professional development is proposed to serve as a mechanism of training teachers to support English Learners.

Alternative pathways for educators make sense when there are other mechanisms in place to ensure that teachers are involved in ongoing professional development through means of higher education. Now that I have been a new faculty at The University of Rhode Island in the School of Education, I have seen the disparity between teachers who have not pursued higher education since their initial licensure and those who have continued their education. There is a sharp contrast in the skill-set between these two groups, and I think we would all agree that we want only the strongest teachers for RI students, especially for our most marginalized population: English Learners. So, if we as a state do not believe all of our teachers should earn a master's degree, we should, at a minimum, ensure the highest quality training is in place for those in pursuit and maintenance of teacher licensure.

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**Q4** Comments regarding: Early Childhood Education  
(5025) - Cut Score 156

Respondent skipped this question

#115

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Monday, October 15, 2018 11:48:43 AM  
**Last Modified:** Monday, October 15, 2018 12:30:00 PM  
**Time Spent:** 00:41:17  
**IP Address:** 68.9.148.71

Page 1

**Q1** Which of the following best describes your role in education?

**Educator Preparation Program Faculty or Administrator**

**Q2** If you support the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding what you support.

The ease of reciprocity for CT and MA teachers (1.7.C). Increasing certification renewal requirements (1.8.3.A).

**Q3** If you have concerns with the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding your concerns.

(1.8.13) Adding endorsements, instead of full certification, for areas like ESL undermine the rigorous training teachers of ELs need to be successful. We are encouraging higher standards in all other areas (e.g. adding PLUs and one-year residency), but reducing qualifications for our most marginalized population.

(1.9.1.C.2.f...and all other areas linked to certification)- Removing a national organization (TESOL) and adding a "RIDE-approved" program erodes the standardization of program development and accountability of program evaluation. Throughout the document, RIDE has eliminated national organizations and replaced it with "RIDE-approved." This removal undermines the work of national organizations to standardize the profession of teaching to ensure all educators are properly prepared to support students. The removal of national organizations to state-specific approval will likely reduce the rigor of licensure, which is counter to many other changes in the proposed regulations (e.g. year-long residency, increased professional development hours, etc.)

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**Q4** Comments regarding: Early Childhood Education (5025) - Cut Score 156

N/A



Proposed Regulation Changes Fall 2018

#116

INCOMPLETE

**Collector:** Web Link 1 (Web Link)  
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**Time Spent:** 00:00:22  
**IP Address:** 174.70.0.41

Page 1

**Q1** Which of the following best describes your role in education?

**PK-12 Administrator**

**Q2** If you support the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding what you support.

Respondent skipped this question

**Q3** If you have concerns with the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding your concerns.

Respondent skipped this question

Page 2

**Q4** Comments regarding: Early Childhood Education (5025) - Cut Score 156

Respondent skipped this question



Proposed Regulation Changes Fall 2018

#117

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Monday, October 15, 2018 5:58:55 PM  
**Last Modified:** Monday, October 15, 2018 5:59:25 PM  
**Time Spent:** 00:00:30  
**IP Address:** 96.233.152.55

Page 1

**Q1** Which of the following best describes your role in education? **PK-12 Administrator**

**Q2** If you support the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding what you support.

I support the changes to include a Registered School Nurse

**Q3** If you have concerns with the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding your concerns. **Respondent skipped this question**

Page 2

**Q4** Comments regarding: Early Childhood Education (5025) - Cut Score 156 **Respondent skipped this question**

Proposed Regulation Changes Fall 2018

#118

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Monday, October 15, 2018 7:47:29 PM  
**Last Modified:** Monday, October 15, 2018 7:51:50 PM  
**Time Spent:** 00:04:20  
**IP Address:** 68.0.207.83

Page 1

**Q1** Which of the following best describes your role in education?

**PK-12 Administrator**

**Q2** If you support the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding what you support.

**Respondent skipped this question**

**Q3** If you have concerns with the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding your concerns.

Regarding reciprocity (1.6 C. 2.) I am wondering if excluding Special Education and ESL certifications will continue to make it harder to hire qualified teachers, therefore negatively impacting our students who need support the most.

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**Q4** Comments regarding: Early Childhood Education (5025) - Cut Score 156

**Respondent skipped this question**

Proposed Regulation Changes Fall 2018

#119

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Monday, October 15, 2018 9:25:22 PM  
**Last Modified:** Monday, October 15, 2018 9:26:48 PM  
**Time Spent:** 00:01:25  
**IP Address:** 108.12.225.251

Page 1

**Q1** Which of the following best describes your role in education? **PK-12 Administrator**

**Q2** If you support the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding what you support.

Reciprocity with Mass and Conn

**Q3** If you have concerns with the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding your concerns.

Like the idea of PLUs but would want to ensure that verification is not burdensome

Page 2

**Q4** Comments regarding: Early Childhood Education (5025) - Cut Score 156 **Respondent skipped this question**

#120

COMPLETE

**Collector:** Web Link 1 (Web Link)  
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**Last Modified:** Monday, October 15, 2018 10:28:24 PM  
**Time Spent:** 00:12:59  
**IP Address:** 108.34.132.78

Page 1

**Q1** Which of the following best describes your role in education?

**PK-12 Support Professional**

**Q2** If you support the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding what you support.

All Grades Registered School Nurse. Pg 101: There are different types of school nurses-some who teach and some who do not. Requiring 8 semesters of graduate education courses for a nurse is unnecessary and excessive. In all specialties of nursing, there are certifications. None require years of coursework and a graduate degree. Asking a registered nurse who has many years of experience and has completed 4 years of schooling prior to those years of experience to continue taking masters level courses in education is not necessary to perform the daily tasks of a school nurse when no teaching in the classroom is involved. Studies have shown that access to a full time school nurse improves the health of all children, increases attendance rates and decreases healthcare costs. There are many experienced and enthusiastic nurses who would be great assets to schools but are denied that ability by the current certification regulations. The children in this state deserve better and this can be achieved with these proposed changes.

**Q3** If you have concerns with the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding your concerns.

Respondent skipped this question

Page 2

**Q4** Comments regarding: Early Childhood Education (5025) - Cut Score 156

Respondent skipped this question

#121

COMPLETE

**Collector:** Web Link 1 (Web Link)  
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**Last Modified:** Tuesday, October 16, 2018 8:29:00 AM  
**Time Spent:** 00:09:00  
**IP Address:** 131.109.111.10

Page 1

**Q1** Which of the following best describes your role in education? **PK-12 Administrator**

**Q2** If you support the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding what you support.

1. Registered School Nurse (432, page 10): the proposed change is an excellent start in terms of acknowledging that there are different types of school nurses. While some spend significant time teaching—thus they should have pedagogical training— most school nurses spend their time reviewing doctors orders, distributing medication, providing important information to the community about medical issues, organizing flu shot clinics, and serving as a first responder. I have found that the additional pedagogical courses required to be a School Nurse Teacher are a real and significant barrier to employing many high-quality professionals who would love the role of a school nurse, but they lack the time or financial means to take the many courses required to be a School Nurse Teacher. To that end, I strongly urge the council to both support the new role of Registered School Nurse, and to consider expanding the proposed change to allow any RN to be a Registered School Nurse, including those with an Associate's Degree.

2. Reciprocity with Massachusetts and Connecticut (1, page 36): this proposed change is an excellent move to remove barriers to talented professionals working in Rhode Island. I personally know of several talented people who have been hired to work in Massachusetts who preferred to work in Rhode Island but were unable to do so because of certification barriers. This extension of reciprocity is important to expanding our talent pool.

3. Substitute Teachers (1.12, page 117) requiring an Associate's Degree or Equivalent is a strong move to increase an important talent pipeline and to better serve our schools. Massachusetts currently has this as a standard; as a result, many aspiring teachers are able to work as professional substitutes, earning income to put toward their bachelor's degree and gaining important experience in the field. Knowing we also have many instructional aids and teaching assistants who are seeking a pathway to teaching—many of whom are more diverse and representative of the students we serve—this may open up avenues for entering the teaching ranks that might not otherwise exist.



## Proposed Regulation Changes Fall 2018

**Q3** If you have concerns with the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding your concerns.

Please consider:

1. Costs of Emergency Certificates are significant and should be reduced. Indeed, the cost is 500% more expensive than the fee for a professional certificate (\$200 for one year versus \$200 for five years) and 600% more expensive than an initial certificate (\$200 for one year versus \$100 for three years). Emergency certificates are only offered for those positions we are desperate to fill, yet we put a financial barrier in front of candidates that is significant. I recommend that an emergency certificate application fee be waived entirely, as that certificate is needed for an emergency.

2. Greatly expand Additional Certifications. We have a number of excellent professionals in the work, including teachers of the year, Milken winners, and others who are gifted educators and have deep content knowledge. For example, the Blackstone Valley Prep 2017-2018 Teacher of the Year is a certified elementary educator teaching sixth grade mathematics - she has exceptional and deep mathematics knowledge, scoring nearly 30 points higher than a Rhode Island passing score on the Praxis Middle School Math exam. Yet, based on our experience, the additional certification pathway (e.g. to add 5-8 math) is closed to her. If you are already deemed prepared and qualified enough to teach Rhode Island children in any one area, and you can show content mastery in an additional area, you should have the opportunity to add additional certificates without taking additional coursework or applying for Expert Residency or Emergency Certificates.

3. Expand the grade span for Elementary Certification. Today's kindergarten is not the kindergarten of yore. Years ago, when the grade 1-6 span was first introduced, most of Rhode Island had "half day" kindergarten with limited academic rigor. One look at the Rhode Island adopted Common Core State Standards shows that today's kindergarten expectations have ramped up dramatically. By allowing Elementary Certified (grade 1-6) educators to teach kindergarten, we will expand the pool of teachers for kindergarten.

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**Q4** Comments regarding: Early Childhood Education (5025) - Cut Score 156

NA



## Proposed Regulation Changes Fall 2018

# #122

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, October 16, 2018 8:46:57 AM  
**Last Modified:** Tuesday, October 16, 2018 9:35:03 AM  
**Time Spent:** 00:48:06  
**IP Address:** 131.109.111.100

Page 1

**Q1** Which of the following best describes your role in education?

Other (please specify):  
School Nurse

**Q2** If you support the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding what you support.

I am in support of 1.1 number 432 pg 10 and 1.9.5 section J pg 101.

I work as a school nurse at Blackstone Valley Prep Elementary School 3 on Mendon Road in Cumberland. I am currently emergency certified going on my 3rd year, trying to get my official certification,. I am urging you to review the RIDE certifications. I do not believe the getting certified is necessary for my practice.

The current RIDE requirements for a school nurse include 3 years of acute care experience, and 8 graduate level courses to achieve certification, completion of pedagogy and subject matter testing requirements . A registered nurse graduates from a 2 or 4 year degree program and is licensed through the state based on passing a national standardized test. Part of the program is a rotation in a school setting, giving nurses an insight to what the specialty entails. I support the requirement for a nurse to have experience in an acute care setting, but I do not support the current RIDE requirements for an additional 8 graduate level courses in education, teaching hours, and testing to achieve certification.

I found that the only course that was relevant to my practice was Methods and Procedures for School Nursing. The course was an overview of the rules and regulations, requirements, and demands of school nursing. I took this class prior to me starting my job and it was very helpful, however most emergency certified nurses learn through experience.

I did take a course that was geared towards health lesson plans. Although insightful, I have not been able to use any of it. I do not have time out of my day to teach full lesson plans. Between medications, injuries, illnesses, health prevention, health promotion, dcyf calls on injuries, dentals, physicals, school hearing, visions, and 504 meetings I have no time to be RIDE's version of a School Nurse teacher. I do consider myself an educator and provide minnie teachings such as hand washing, correct medication administration, epi-pen training, etc, but none of this is learned through any of the 8 courses provided.

Furthermore, being in a classroom with other teachers where the course is really geared for them is unfair. Taking the course, Social Issues in Education is not only irrelevant to practice but does not advance my skills in any way. It is also hard to retain/ develop interest to something that isn't used in everyday practice My school already does a great job addressing the social and cultural aspects in constant professional developments throughout the year.

My training and expertise have come from my degree and nursing licence along with many in-services and trainings specifically geared to school nursing such as a seminar on emergency skills for school nurses, and other related credits that are required to maintain my nursing license.

Please review the importance of having an already qualified registered nurse as school nurse. Please consider a dual pathway for certification to be a school nurse.

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**Q3** If you have concerns with the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding your concerns.

Respondent skipped this question

Page 2

**Q4** Comments regarding: Early Childhood Education (5025) - Cut Score 156

Respondent skipped this question

## Proposed Regulation Changes Fall 2018

# #123

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, October 16, 2018 9:41:43 AM  
**Last Modified:** Tuesday, October 16, 2018 9:42:44 AM  
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**IP Address:** 131.109.111.100

Page 1

**Q1** Which of the following best describes your role in education?

Other (please specify):  
School Nurse

**Q2** If you support the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding what you support.

I am in support of 1.1 number 432 pg 10 and 1.9.5 section J, pg 101. I have been a Registered nurse since 1992 and I was a CNA prior to that. I feel that I am expertly prepared to continue in my current position as a school nurse for the students I currently serve. School nursing requires assessment, critical thinking and implementation of a plan of action, usually within minutes, without the assistance of an MD. These skills come from clinical experience. I have written and implemented numerous care plans, 504's and have aided in the IEP process successfully without having taken any classes to do so. Of the remaining classes that I am required to take as set forth by RIDE, I do not feel that they will aid in my current practice. I am an adult educator, a CNA instructor, in a RI school system and I have been teaching for 6 years and was not required to complete any post-graduate instruction to do so. Nurse's are teachers from the minute we begin our careers. We educate our patients and often their families with almost every interaction. Whether it's how to take a medication properly, post-concussion care, health promotion thru immunizations' compliance or counseling a mother who just found out her daughter has a serious GI disorder, we are constantly educating. We also educate ourselves daily thru research and evidence-based practice. We advocate for our students and interact with physicians, PA's and RNP's to obtain the best possible care and outcomes for our students. We are innately counselors and we listen attentively as it all part of our assessment skill-set. We offer emotional support through our words, actions, and healing touch. I have heard of vigorous opposition to the proposed changes by some of those who have already completed the previous pathway. There is an old saying that nurses eat their young. I have been in the nursing profession for over 25 years and I can attest to the truth of this, both in the giving and receiving end. I am not demeaning, in any way, those specialized nursing professionals who have completed the certification program. I applaud them in their desire to pursue this specialty. I do not have the desire to do such a task. My district does not require that I teach a health curriculum. I feel that my current studies redirect my attention away from my practice as a school nurse. Instead of writing a wellness newsletter for students and families or promoting a community flu clinic, I am spending my time studying concepts and practices in a health curriculum that do not pertain to my practice. I feel discriminated against to some degree as I am being forced to take courses that are unrelated to my practice. I implore you to allow for 2 pathways to allow professional, dedicated RN 's to obtain their school nurse certification. There are many school districts in RI who do not have a permanent School Nurse in residence due to the demands of the current requirements. Please accept the proposed changes so that every student in RI will have access to a nursing professional. Care equity is the desired outcome that we all are striving for. By accepting the dual pathway certification we can achieve that goal.

**Q3** If you have concerns with the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding your concerns.

Respondent skipped this question

Proposed Regulation Changes Fall 2018

Page 2

**Q4** Comments regarding: Early Childhood Education  
(5025) - Cut Score 156

Respondent skipped this question



#124

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, October 16, 2018 11:37:12 AM  
**Last Modified:** Tuesday, October 16, 2018 11:39:37 AM  
**Time Spent:** 00:02:25  
**IP Address:** 131.109.111.100

Page 1

**Q1** Which of the following best describes your role in education? **PK-12 Support Professional**

**Q2** If you support the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding what you support.

I am in support of 1.1 number 432 pg 10 and 1.9.5 section J, pg 101. I have been a Registered Nurse with a Bachelor of Science in Nursing since 1989. I have held positions as a Pediatric Nurse at Montefiore Medical Center (Bronx, NY), Hasbro Children's Hospital and multiple homecare agencies. I feel that I am expertly prepared to continue in my current position as a school nurse for the scholars I currently serve at Blackstone Valley Prep High School. School nursing requires assessment, critical thinking and implementation of a plan of care, usually within minutes, without the assistance of an MD. These skills come from clinical experience. Of the remaining classes that I am required to take as set forth by RIDE, I do not feel that they will aid in my current practice. Nurses are educators from the minute we begin our careers. We educate our patients and their families with almost every interaction. Whether it's how to take a medication properly, post-concussion care, health promotion through immunization compliance or diabetic teaching to name a few, we are constantly educating. We also educate ourselves daily through research and evidence-based practice. We advocate for our students and interact with physicians, PA's and RNP's to obtain the best possible care and outcomes for our students. We are innately counselors and we listen attentively as it all part of our assessment skill-set. We offer emotional support through our words, actions, and healing touch. I have heard of vigorous opposition to the proposed changes by some of those who have already completed the previous pathway program. I applaud them in their desire to pursue this specialty. My district does not require that I teach a health curriculum. I implore you to allow for 2 pathways to allow professional, dedicated RN 's to obtain their school nurse certification. There are many school districts in RI who do not have a permanent School Nurse in residence due to the demands of the current requirements. The American Academy of Nursing has stated that daily access to a full-time school nurse is imperative for improving the health of this country's children, in turn leading to decreased health issues in adulthood and the decrease in health related costs. With the current requirements within Rhode Island, the access to a full time nurse in every school within the state is not being met. Recent studies have shown that as many as 27% of children have chronic health conditions, 13-20% of children are experiencing mental health issues, and there are increasing cases of communicable diseases as a result of increased immunization exemptions resulting in decreased herd immunity. These same studies have shown that for every dollar spent on access to a full time school nurse, more than twice that dollar amount is saved. Nurses increase attendance rates, promote health, assist in identification and supports for mental health, and manage chronic health conditions. The results are more student time spent in the classroom and increased academic achievement.

Please accept the proposed changes so that every student in RI will have access to a nursing professional. Care equity is the desired outcome that we all are striving for. By accepting the dual pathway certification we can achieve that goal.

**Q3** If you have concerns with the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding your concerns. **Respondent skipped this question**

Proposed Regulation Changes Fall 2018

Page 2

**Q4** Comments regarding: Early Childhood Education  
(5025) - Cut Score 156

Respondent skipped this question



## Proposed Regulation Changes Fall 2018

# #125

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, October 16, 2018 12:53:53 PM  
**Last Modified:** Tuesday, October 16, 2018 12:56:27 PM  
**Time Spent:** 00:02:33  
**IP Address:** 131.109.111.101

Page 1

**Q1** Which of the following best describes your role in education? **PK-12 Administrator**

**Q2** If you support the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding what you support.

I support reciprocity for teachers who have certification in Massachusetts and Connecticut. When it comes to impacting student learning, we know having a quality teachers is arguably the biggest lever. That said, we should do everything in our power to ensure we maximize the number of quality teachers in Rhode Island, and removing certification barriers by allowing reciprocity would further that goal.

**Q3** If you have concerns with the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding your concerns. **Respondent skipped this question**

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**Q4** Comments regarding: Early Childhood Education (5025) - Cut Score 156 **Respondent skipped this question**

#126

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, October 16, 2018 12:52:06 PM  
**Last Modified:** Tuesday, October 16, 2018 1:03:30 PM  
**Time Spent:** 00:11:23  
**IP Address:** 131.109.111.100

Page 1

**Q1** Which of the following best describes your role in education?

**PK-12 Support Professional**

**Q2** If you support the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding what you support.

Reciprocity with Massachusetts and Connecticut on page 36. These states are so close we should be opening up our teaching pool to potential teachers from them.

**Q3** If you have concerns with the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding your concerns.

Respondent skipped this question

Page 2

**Q4** Comments regarding: Early Childhood Education (5025) - Cut Score 156

Respondent skipped this question

## Proposed Regulation Changes Fall 2018

# #127

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, October 16, 2018 1:51:55 PM  
**Last Modified:** Tuesday, October 16, 2018 2:00:44 PM  
**Time Spent:** 00:08:49  
**IP Address:** 131.109.111.100

Page 1

**Q1** Which of the following best describes your role in education? **PK-12 Administrator**

**Q2** If you support the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding what you support.

-Registered School Nurse: the proposed change allows school leaders like myself the ability to hire a qualified and competent registered nurse without worrying about whether or not they are a teacher nurse (since teaching is not needed). A registered nurse can do all the tasks I require as a school leader: review doctors orders, distribute meds, share medical information (e.g. clinics, flu shots), etc. Personally my nurse has been given the run around attempting to get certified as a school nurse, taking away from her ability to be the first responder at my school.

-Reciprocity with Massachusetts and Connecticut: this proposed change is an excellent move to retain and attract high quality professionals across our very close borders. Recruiting and retaining high quality teachers has been a constant concern of mine as a school leader and I believe this change removes barriers to talented professionals working in Rhode Island.

**Q3** If you have concerns with the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding your concerns.

This piece continues to be a HUGE problem for me as a school leader:

-We need to expand the grade span for Elementary Certification to include kindergarten. As a former kindergarten, first, and second grade teacher and a current K-4 school leader, I can tell you teaching kinder is not that different from teaching first. Having teachers K-2 and 1-6 greatly inhibits me from putting high quality teachers in front of kids. Elementary cert needs to be K-6. Additionally, taking kinder out of the elementary special educator cert makes it NEARLY IMPOSSIBLE to service kindergartners with IEPs.

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**Q4** Comments regarding: Early Childhood Education (5025) - Cut Score 156

Respondent skipped this question

## Proposed Regulation Changes Fall 2018

# #128

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, October 16, 2018 4:53:52 PM  
**Last Modified:** Tuesday, October 16, 2018 5:25:44 PM  
**Time Spent:** 00:31:52  
**IP Address:** 158.123.187.119

Page 1

**Q1** Which of the following best describes your role in education? **PK-12 Administrator**

**Q2** If you support the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding what you support.

P. 25: I support the addition of the standard focused on equity and cultural responsiveness. It's about time!

P. 59, Advanced Professional Certificate: I support the addition of this new certificate area because teachers with those additional credentials/awards have demonstrated excellence and should not have to renew their certificate as often as they do currently.

P. 76, Expert Residency Shortages: I support the expansion of this certificate from one to three years in our shortage areas because we desperately need to attract fresh talent to these subject areas.

P. 80-81, Teacher Certificate Areas: I wholeheartedly support the addition of allowing a teacher to teach in an additional area no more than 20% of their time. This is absolutely critical for our high schools where we often lack qualified candidates in math, science, special education and ESL. For example, no teachers with a physics certification applied for an opening at our school this year. A very qualified competent teacher in the science department was interested in teaching this course but lacked the physics certification (has biology and chemistry). Instead of seeking emergency certification or needing a long-term sub to fill this vacancy, I could assign this teacher to teach a physics section based on interest and expertise. This change will also afford us more flexibility to be creative in developing courses based on teacher and student interest. For example, why couldn't a social studies teacher teach journalism if interested?

P. 115, School Nurse additional certificate: It is ESSENTIAL that RIDE creates this new certification to open up our applicant pool beyond the limited number of school nurse teachers. In my 20 years in public education, I've never had a school nurse teach health because they are too busy nursing and focusing on that primary expertise. If a school requires that a school nurse teach health, the school nurse teacher certificate makes sense. It makes even sense to open this up to TWO different certificates to allow schools to post for exactly what is needed in 2018.

**Q3** If you have concerns with the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding your concerns. **Respondent skipped this question**

Page 2

## Proposed Regulation Changes Fall 2018

### **Q4** Comments regarding: Early Childhood Education (5025) - Cut Score 156

I support this cut score.



## Proposed Regulation Changes Fall 2018

# #129

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, October 16, 2018 6:05:29 PM  
**Last Modified:** Tuesday, October 16, 2018 6:13:23 PM  
**Time Spent:** 00:07:53  
**IP Address:** 174.199.21.105

Page 1

**Q1** Which of the following best describes your role in education? **PK-12 Administrator**

**Q2** If you support the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding what you support.

I strongly support the regulation changes in the following areas:

Expanding certification to include those certified in MA and CT. In fact, I would argue that this change should include additional states. In some hard-to-staff areas, such as Secondary Math and Secondary Special Education, our local ed prep programs are preparing far too few candidates. This change would allow us to recruit qualified and effective teachers from just over our borders and farther afield.

Certified Nurse Practitioner: Many school nurses have little responsibility for teaching. The current certification requirements are a mismatch with the need in schools and present an undue burden for those wishing to enter this role.

Substitute teachers requiring an Associated degree: This change would expand the pipeline of potential teachers by allowing aspiring teachers to earn an income while completing their undergraduate education. It would be one way to make a degree in education attainable for a greater diversity of candidates, thereby providing a pathway for more teachers of color who would bring additional cultural competence and community connections to our classrooms.

**Q3** If you have concerns with the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding your concerns.

Respondent skipped this question

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**Q4** Comments regarding: Early Childhood Education (5025) - Cut Score 156

Respondent skipped this question



Proposed Regulation Changes Fall 2018

#130

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, October 16, 2018 6:31:48 PM  
**Last Modified:** Tuesday, October 16, 2018 6:37:39 PM  
**Time Spent:** 00:05:51  
**IP Address:** 70.188.128.178

Page 1

**Q1** Which of the following best describes your role in education?

**Educator Preparation Program Faculty or Administrator**

**Q2** If you support the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding what you support.

Respondent skipped this question

**Q3** If you have concerns with the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding your concerns.

p. 112 F. All Grades Library Media Teacher 2. d. Has completed a minimum of one-year practical residency. I am concerned about this because school media is a high demand area but the current 12 week student teaching requirement is a barrier to many interested individuals. Since the Library Media Educator Preparation program is a Master's level program, interested people are usually working full time with families. If teachers, especially those in surplus areas, want to get a school media certificate, the current 12 week student teaching is a barrier. We need people certified in this area and making the student teaching even more unrealistic for the population that can enroll in the program. Please do not require this. If you want to improve educator quality, then require PD for teachers and a new teacher induction program.

Page 2

**Q4** Comments regarding: Early Childhood Education (5025) - Cut Score 156

Respondent skipped this question

Proposed Regulation Changes Fall 2018

#131

INCOMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, October 16, 2018 5:53:17 PM  
**Last Modified:** Tuesday, October 16, 2018 7:07:09 PM  
**Time Spent:** 01:13:51  
**IP Address:** 100.10.41.88

Page 1

**Q1** Which of the following best describes your role in education?

**PK-12 Support Professional,**  
Other (please  
specify):  
Certified School Nurse Teacher

**Q2** If you support the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding what you support.

Respondent skipped this question

**Q3** If you have concerns with the proposed changes to regulations, please cite the regulation(s) by topic, reference the page number(s) and then provide details regarding your concerns.

School Nurse Certificate elimination. Students deserve Certified Nurses who possess the knowledge, to advocate in the health and educational process that provides student success.

Page 2

**Q4** Comments regarding: Early Childhood Education (5025) - Cut Score 156

Respondent skipped this question