Local 1461, American Federation of Teachers, AFL-CIO LINCOLN, RHODE ISLAND 02865

Education for Democracy Democracy in Education

Dear Members of the Rhode Island Board of Education,

A package of sweeping changes to Rhode Island Regulations Governing Educator Certification was approved for public hearing by the Council for Elementary and Secondary Education. These changes will have a significant impact on every current and future educator in our state. The Lincoln Teachers' Association (LTA) and the RI Federation of Teachers and Health Professionals (RIFTHP) are pleased that teacher evaluations will no longer be associated with certificate renewal. Leaders of the LTA and RIFTHP have carefully examined these proposed changes and have numerous concerns.

We ask the Council to carefully consider these proposed changes and the Lincoln Teachers' Association's and Rhode Island Federation of Teachers and Health Professionals' suggestions as a way of making the certification changes more in line with regulations that would be fair for both potential and current teachers and districts.

#### Onerous Annual Professional Development Requirement

- The LTA and RIFTHP believe that thirty hours per year for every teacher is arbitrary and unnecessary and asks that the annual PLU requirement be reduced.
- 2. The LTA and RIFTHP believe that the 75% sustained requirement is unreasonable. If a district determines that it is a priority for its staff members to develop a specific skill or body of knowledge, then the regulations should require that it should be the district's responsibility to provide it for all employees.
- 3. The proposed changes shift both the logistical and financial responsibility away from both RIDE and the District and onto the backs of the classroom teacher. The proposal fails to require that the districts provide PLUs that are sustained and aligned to district initiatives.

#### Lack of a Systemic Process or Service Delivery Model

- 1. The LTA and RIFTHP ask that RIDE, not school staff, have the authority to approve PLUs.
- The proposed certification changes lack an appeal process to resolve disputes over District and Superintendent decisions related to PLUs and teacher certification. The RIFTHP asks that an appeals process be included in the regulations.
- 3. Proposed changes impose a burden on school districts for managing a PLU system. It also imposes a burden on classroom teachers for the manual or electronic storage of records for a five-year period without an appropriate mechanism or platform. The proposed regulations do not require RIDE to provide resources even though RIDE, not the district, is the recipient of teacher certification fees.

### **Negative Impact on Pre-Service Candidates**

- 1. Proposed changes would increase the field experience requirement for traditionally prepared teacher candidates to "the equivalent of a one-year practical residency" while continuing to allow Teach for America and other Alternate Route candidates to be certified base on a less rigorous requirement. This will cause a challenge in needing additional placements for student teachers, additional clinical faculty and cooperating teachers and the possibility that fewer schools/cooperating teachers will be willing to take student teachers for an entire year. The LTA and RIFTHP recommend that either the one-year residency be reconsidered or that Section 1.86 be amended to require one-year residency for alternative route candidates.
- 2. This same section also maintains a required 60 hours of field experience in addition to the one-year residency. This imposes a significant financial and time burden on students. This proposal would add tuition costs and could be a barrier to attracting a more diverse group of individuals into the teaching profession. The LTA and RIFTHP request that the sixty-hour field experience be considered a part of their residency requirement and not an addendum.

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### The De-Professionalization of Teaching

- A proposed certification change would allow teachers to teach 20% of their work load in an area in which they
  are not certified. This undermines the very essence of mandatory content specific certification and represents
  significant erosion of the certification process and the value of students being taught by highly qualified certified
  professionals. The LTA and RIFTHP ask that this provision be deleted.
- A proposed change would create a sub-category of Registered School Nurse which is a departure from a 1976 legislative mandate that requires districts to employ certified school nurse teachers. The LTA and RIFTHP ask that this provision be removed.
- 3. Currently, Career and Technical Education Teachers must hold a bachelor's degree from an accredited institution. The LTA and RIFTHP ask that the BA requirement continue to be required as it would required as it would be the only area of certification in which a bachelor's degree is not required.
- 4. A proposed change proposes an Expert Residency Shortages Preliminary Certificate based on an undefined concept referred to as Cultural Competence. The LTA and RIFTHP ask that this vague, undefined concept not be included in the new regulations.
- 5. Another proposed change would allow individuals with two years of college or an associate degree to serve as a substitute teacher. Current regulation requires a minimum of a bachelor's degree. The LTA & RIFTHP ask that the bachelor's degree remain a requirement.

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