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Public Hearing on the Proposed Revisions to the Regulations Governing the
Certification of Educators in Rhode Island

SIGN-IN SHEET

Thursday, September 27, 2018

NAME (please print)	INSTITUTION/ORGANIZATION	In Favor	Opposed
✓ 1. Roderick E. DASILVA	Cranston School Teacher		✓
✓ 2. Renee DiGamo	Woonsocket certified SNT		✓
✓ 3. Maria Therien Tout	" "		✓
✓ 4. Cynthia Paine	Warwick		✓
✓ 5. Rachel Cruz	RICSNTA		✓
✓ 6. Karen Tarasovich	WWPS		
✓ 7. Jeannine Noh	Cranston		
✓ 8. Tracey Cavanaugh	Central Fall		
✓ 9. Dr. Brady Dr. Brady Mice	RIC		✓
✓ 10. Kathy Crowley	Evel Providence	✓	
✓ 11. Rhonda Sexton	Lincoln		✓
✓ 12. Theresa Smith Dory	Woonsocket SNT		
✓ 13. Theresa Smith Dory			
✓ 14. Derrick Garforth	Pawtucket Schools		✓
✓ 15. Amy Wright	No. Smithfield		✓



16	Allison Roseau	East Providence Public Schools		
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9/27/18

Testimony of Rhonda Sexton, RN, MEd, Certified School Nurse Teacher
2A Kennedy Blvd. Lincoln, RI 02865

My name is Rhonda Sexton. I have been employed by Lincoln Public Schools as a certified school nurse teacher for the past 17 years. I am here in opposition to the proposed pathway to school nurse certification that would eliminate required education courses. This is concerning. When I began my specialized career path of school nursing I was an experienced pediatric nurse with over 15 years of experience including trauma and emergency room experience. By taking the required courses for certification, I learned how to navigate through the educational system. In the hospital, you do not learn about 504 plans, IEPs, mandated screenings, being a part of the educational team, how certain illnesses, diseases and communicable diseases can impact a student's access to his/her education and how to manage a school health office. This information is part of the certification process and we are provided with the necessary tools and resources to be a part of the educational team. We are also certified to teach health education classes. School nursing is much more than just clinical nursing.

Our goal as school nurse teachers is to do what is best for our students. They deserve highly qualified certified school nurse teachers with proper training and knowledge of the education system. By having nurses who are not properly educated and that are just clinically trained, you will be compromising care and ultimately the children will be the ones who will suffer. I feel this is a disservice to the children and the school community.

Thank you for taking the time to hear this testimony.

Rhonda Sexton, RN, MEd.
Certified School Nurse Teacher

A handwritten signature in black ink that reads "Rhonda Sexton" followed by a stylized flourish.



9/27/2018

Hello,

My name is Rachel Cruz. I have a Masters of Education, a Bachelor of Science in Nursing and I am a Registered Nurse with a RI School Nurse Teacher Certification. I am also the President of the Rhode Island Certified School Nurse Teachers Association. I am speaking on behalf of the organization that we are **opposed** to the new changes being made to the certification of school nurses.

The National Association of School Nurses defines school nursing as: A **specialized** practice of professional nursing that advances the well-being, academic success and lifelong achievements of all students.

1. The new pathway "The All Grades Registered Nurse" eliminates any required coursework or further education beyond the BSN and RN.
2. A split pathway will create an inequity of school nursing services between districts.

Taking away advanced education and training of nurses is **not** how to fix a capacity problem. It will only decrease the quality of school nursing services and may ultimately result in decreased test scores, reduce access to an equal education, and increase absenteeism.

All the students in Rhode Island deserve nurses who are highly qualified and prepared.

A recent survey shows that the majority of districts did **not** have a capacity problem and employ a full time school nurse.

The Rhode Island Certified School Nurse Teachers Association is willing to collaborate with the Department of Education to ensure that quality and capacity is maintained.

Thank you for your time.
Respectively,

Rachel Cruz M.Ed., BSN, RN, RICSNT
President RICSNTA



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Public Hearing on the Proposed Revisions to the Regulations Governing the Certification of Educators in Rhode Island

SIGN-IN SHEET

Monday, October 1, 2018

NAME (please print)	INSTITUTION/ORGANIZATION	In Favor	Opposed
✓ 1. Kathleen Torregrossa	Cranston Public School	X	X
✓ 2. Audrey Hersch	Cranston Public School	X	X
✓ 3. Denise Flores	Barrington Public Schools		X
4. Donna Lennon	RIASD	X	
✓ 5. Jim Parisi	RIFTHP		
✓ 6. Cathleen Hickey	School Nurse Teacher PHS		
7. Nancy Selma MacPhee	Pocasset-Tiverton		
✓ 8. Donna Lennon	South Kingstown District Nurse Coordinator		X
✓ 9. Christine Vuolo	Facteau Ports SD Teacher		X
✓ 10. Carla Sweeney	Tiverton School Nurse- Ranger School Teacher		X
✓ 11. Rachel Cruz	ANA - RI		X
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13.			
14.			
15.			

RICSNT Public Hearing

Linn Alvarnas MEd,BSN,RN,NCSN
Supervisor of Nursing Services
1351 West Main Rd
Portsmouth, R.I. 02871
alvarnasl@portsmouthschoolsri.org
401-226-4156

To Whom It May Concern:

I have been a pediatric nurse for 38 years. The last 23 years of my career have been spent as a school nurse. In addition I have continued to work in pediatric home care.

I'm writing this on behalf of the colleagues who will follow me in the speciality of School Nursing. My career prior to schools was very diverse and much of it was spent in intense, emergency and high risk pediatric care. While I was well acquainted with pediatric care I was surprised by the challenges and diverse complicated demands of school nursing. I was thankful for the preparation I received while getting my masters degree.

RI historically has had highly qualified school nurses. On a national level RI is one of a few states that enjoys such status.

This is evidenced by:

- * The highest level of compliance with childhood immunizations in the nation.
- * Health education : School nurses all educate students some in the classroom but all school nurses educate everyday of their practice.
- * School nurses play an integral role in keeping children in schools with complicated medical conditions providing medical expertise with a complete understanding of how best to get the job done in schools
- * Most school nurses see more students in their offices than emergency room nurses see in the course of a nursing shift.
- * With the increasing attention on the mental health needs of students school nurses have been identified as the person students are most likely to engage with first. Students seek out the school nurse before guidance counsellors, teachers or any other support people in schools.
- * School nurses are the ONLY medical professionals in most buildings. They accept responsibility for the health and safety of every student and staff member in the building.
- * In a crisis situation school nurses SAVE LIVES.
- * Everyday school nurses teach and promote healthy choices and lifestyles. It does not matter what students know if their lifestyle choices prevent them from utilizing their education

Students in RI deserve highly qualified teachers and HIGHLY QUALIFIED SCHOOL NURSES
Their very lives may depend on that nurse one day.
Please VOTE NO to changes in School nurse teacher certification

Testimony at RIDE Hearing for Oct. 1st, 2018

Position- Opposed to the proposed changes to create an additional pathway for school nurse certification

Hello-

My name is Donna Lennon and I have been a Certified School Nurse Teacher for 24 years. I am currently serving as the District Nurse Coordinator for the South Kingstown School Schools. I am opposed to the changes as I feel that the additional pathway will not adequately prepare nurses for the Advanced Practice specialty of School Nursing.

I have been involved in providing structured orientation to new school nurses as well as substitute school nurses for our district. Some have had years of experience at Hasbro Children's Hospital.

And still, I have found that the nurses that have completed or in process of taking the coursework are much better prepared to care for the many needs and aspects of students in the school setting. Much less orientation is needed for nurses that are taking the coursework which saves district's time and money.

Certified School nurse teachers are required to teach the OSHA required course of Blood borne pathogens to school staff every year, as well as teach epipen administration, CPR and review concussion management at least annually.

Certified School Nurse Teachers are familiar with the pedagogy and they provide health education with every student encounter in the health office and in classrooms. They have an understanding of the School Health Rules and Regulations as they have studied them and know the requirements.

They are familiar with common language such as IDEA, FERPA, 504s and IEPs and have a deep understanding of applicable standards from the educational classes that they have taken.

We have heard that there is a shortage of Certified School Nurse Teachers. Over the past few years, we have had a few less candidates for full time positions but have been able to fill them easily. It is a much different story when it comes to substitute school nurses. We struggle to cover nurses that are out sick as they are paid very little for the liability they take on. And few are willing to do that.

I am in agreement that changes are needed in the certification process. Nurses entering into the process find it is very confusing and time consuming. They are told to work with a Credentialing review process at Rhode Island College, as well as coordinate with RIDE- often being told to go back to the other after paying \$150. for the review and no help is given. The process can take up to 10 months. One year of practical residency is also required which is not at all realistic or practical to nurses that have at least 3 years of nursing experience and are working full time already.

The new pathway and requirements for school nurse teachers on pages 101 and 102 are vague and are not at all specific and will serve only to create more confusion.

I am in agreement with the coursework and Praxis testing. It fully prepares nurses with tools, resources, knowledge and the skillset needed to care for Rhode Island's students.

Our Statewide District Nurse Coordinator group as well as RICSNTA are willing and able to help work on a solution to the certification process.

Thank you for your time and consideration.

Donna Lennon, M.Ed, BSN, RN, CSNT

401-499-9843 dlennon@sksd-ri.net

District Nurse Coordinator South Kingstown Schools

Statement of Opposition for two pathways for Certified School Nurse Teachers 10/1/18



My name is Denise Flores, and I am here to **oppose the dual pathway** for School Nurses. For 30 years I have been a registered nurse. I have my Masters Degree in Education, Bachelor of Science in Nursing, and for the past 15 years have been Certified as a School Nurse Teacher in Barrington, RI also serving as the District Coordinator/Head Nurse. I am a National Board Certified School Nurse and National Certified School nurse state liaison for Rhode Island & member of RICSNTA.

School nursing is a specialty in which the current RIDE certification process educates and prepares RN's coming from various nursing backgrounds to be qualified to practice as Certified School Nurse Teachers. The proposed dual pathway will create a disparity for those nurses not certified.

My almost 200 colleagues come from various nursing backgrounds, experiences, and nursing specialties, in both adult and pediatric settings prior to becoming CSNT's. Many of us have an extensive pediatric background working with children, however this did not prepare us for the specialized and unique role we have as a School Nurse Teacher.

The Common Denominator for All School Nurse Teachers in RI is the Certification Process! This process ensures we are all equally educated in common coursework and training that qualifies us to effectively practice in the speciality of a school setting and be certified health educators. No other nursing training can prepare one to be a school nurse.

The alternate pathway will allow a RN with three years experience from any clinical setting, to work autonomously as a solo practitioner in the school setting, without the necessary certification which will be a disservice to the students we serve.

Through advanced coursework and training, the current Certification process prepares us to be vital members of the educational team to collaborate and communicate with educators, special educators, school social workers, psychologists, speech pathologists and administrators as well as community service providers. We understand the unique issues applicable to advance the health and learning of students and wellness of the school community.

Certified School Nurse Teachers are:

- **Health Care Providers:** for all students with illnesses, injuries and chronic conditions.
- **Care Coordinators:** Case manager for students with chronic and complex health conditions. Coordinating health and community services for students and families.
- **School Health Leaders:** Planning and leading health programs and policies. Advocating for student health.

District Head YES-Vacancy NO-Vacancy # Unfilled FTI Addit. Info.									
District	Denise Flores	Yes-2 in last 5 yrs.	1/2 yr.	0 Filled 2 SNT/CSNT	6 applied -1 hired 2017; 3 years ago several applied 1 CSNT hired				
Barrington	Ellen Estrella	2016-midyr.			Nurse left Bristol for another district mid-yr. Filled following school year 2016-17 with CSNT (1/2 yr. vacant "no good fit")				
Bristol/Warren	Linda Allard	Yes-2 in last 5 yrs		0 Filled 2 CSNT-5 applied-filled immediately					
Burrville	Donna Mansollic	Yes-3 over 5 years		0 Filled all 3 with CSNTs (1 was working on Cert.)					
Charlho	Deb Oliver	No		0					
Coventry	Deb Svtili	No		0					
Cranston	Donna Marszalkowski	No		0					
Cumberland	Sue Breen	No		0					
Foster	Foster/Gloc. Reg Sue Breen	No		0					
Foster/Gloc. Reg	Sue Breen	No		0					
Glocester	Patty Toracinta	No		0					
Jamestown	Sandi Delack	No		0					
Johnston	Rhonda Sexton	No		0					
Lincoln	Linda Twardowski	Yes 1- 2018-19 yr. resign.	in process hiring	0	None in 22 years Currently hiring elementary school				
N. Kingstown	Janet Gaspari	No		0					
N. Providence	N. Smithfield	No		0					
N. Smithfield	Marilyn Kelley	No		0					
Narragansett	Marianne Manzi	No		0					
Pawtucket	Kristen Barry	Yes -1	1-11/17 to 6/18	Currently filled- was MS position -no vacancies now					
Portsmouth	Linn Alvarez	Yes-1 in last 5 yrs.		0 Filled-1 CSNT (Chris Vuolo Fedteau)- problem getting subs however					
Providence	Donna O'Connor	Yes - 3	3- unfilled 2018-1	The vacancies this year are all elementary. In June had 7 vacancies and filled them all CSNTs. Last year had 2 vacancies- agency RN's covered					
RI Nurses Instit.	Debra Audette	No		0					
S. Kingstown	Donna Lennon	No		0					
Scituate	Lisa Myer	No		0	Struggle to fill 4/5 float positions				
Smithfield	Celine Forte	No		0	0.65 position hired this year not CSNT-Emerg. Certified & not taking classes-covers one elementary school (140 students)				
Tiverton	Carla Sweeney	Yes-2 retired		0 Filled by Emergency Certified SNT- Had CSNT applicants that chose higher paying districts					
W. Warwick	Lorraine Martell	Yes-2 in 2018		0 Filled - 2 CSNT; 7 applied-2 hired					
Warwick	Kathy Tiparmoni	No		0 Employ -14 Elementary, 2 MS, & 2 HS CSNTs					

RIDE Public Hearing on Educator Certification Regulations

October 1, 2018

Audrey Hirsch, BS
Cranston Public Schools

As a public school educator, I have two questions that I am wondering about:

1. First, why are only publicly funded educators held to this standard?
 - a. Why wouldn't any educator, holding a RIDE certification regardless of where they are employed, need to meet all the same requirements, considering they hold the same certification.
 - b. Why place a burden on only a subset of your similarly certified teachers?
 - c. Aren't the parents of students in all schools, entitled to have their teachers meet the same high standards in order to teach their children?
2. What is RIDE doing to support this initiative?
 - a. There is a professional learning calendar on the RIDE site, but it clearly does not run enough courses to support all the certified teachers in this state.
 - i. Based on the RIDE professional learning calendar, there were 42 courses offered from August 2017 to June 2018, for a state with over 10,000 teachers. There were at least 4 times that many courses offered in Cranston for our 1000 educators during the same time frame.
 - b. So, with this new initiative of 30 professional learning units/hours a year, will RIDE be offering more courses through their platform for all teachers to access?
 - c. For an initiative this big, there should be impact on, and support from RIDE for all of the educators that are being impacted by your regulations.
 - i. How will you assist districts fiscally, so that there is equity for all educators across the state, or is this another unfunded mandate? One that equates to teachers volunteering to work almost an extra week each year, for no pay!

RIDE Public Hearing on Educator Certification Regulations

October 1, 2018

Kathleen Torregrossa, Ed. D

Cranston Public Schools

Coordinator of Educator Evaluation, Professional Learning, & Mentor Programs

Good evening, I am here to share several concerns regarding the new certification regulations, most pressing being the 30 hours per year of Professional Learning, and the impact of this on districts and educators.

1. District Impacts:

- a. Cranston asks all of their educators to complete 8 hours of professional learning each year, which they are paid for, as these activities occur after the regular school day. That may not sound like much, but more than half of our teachers attend more than the required 8 hours (receiving no pay).
 - i. The impact here is that we use our own teacher leaders to facilitate these sessions so that the professional learning is seamlessly aligned to our district initiatives and goals. How will our teacher leader facilitators meet their own 30 hour requirement if they are also providing 30 hours to their colleagues. Clearly 60 hours now means that in a 39-40 week school year, they are facilitating or attending multiple courses just about every week! That is a lot of time to ask of educators and, as our presenters have been paid in the past, that would be a significant fiscal impact on the district.
 1. For example - currently a facilitator make \$53 per hour times 8 hours, which equals \$424. If the same educator now facilitates 30 hours at \$53 per hour, it will cost the district \$1590 per facilitator.
 2. In order to meet the 8 hour requirements for Cranston (with 1000 educators), we have run, since August 20, 2018, 136 courses with another



Commissioner Kenneth Wagner
Rhode Island Department of Education
Providence, RI 02903

Dear Commissioner Wagner:

The ANA-RI a constituent association of the American Nurses Association which is the Professional association for registered nurses represents over 18000 registered nurses in the State of Rhode Island.

It is of great concern to the ANA-RI of the proposed changes that create two Pathways in order to be qualified to become a school nurse teacher. School Nurse teachers hold a unique role; they are licensed as registered nurses and certified as teachers. This unique role insures the health and safety of our students. The second pathway that has been proposed jeopardizes this unique role. The integration of nursing and education is essential in order to carry out the role and requirements of a school nurse teacher. eliminating the education requirements jeopardizes the health and safety of our students. School nursing is a certified specialty of nursing practice and the required coursework in the current pathway prepares school nurse teachers to take on that role.

The ANA-RI urges the committee to remove the second Pathway from consideration. The ANA-RI would welcome meeting with the Commissioner in order to clarify the rationale regarding this proposal.

Sincerely yours,

Donna Policastro

Donna M. Policastro, RN
Executive Director



RHODE ISLAND FEDERATION OF TEACHERS AND HEALTH PROFESSIONALS ^{AFT} AFL - CIO

October 1, 2018

Angela Teixeira
Rhode Island Board of Education
255 Westminster Street
Providence, RI 02903

Dear Ms. Teixeira;

The Rhode Island Federation of Teachers and Health Professionals has numerous significant concerns and objections to the proposed changes to the regulations governing educator certification in Rhode Island. In my short time available for public testimony, today I offer the following objections to proposed changes in Section 1.4B 6.

Section 1.4 contains several specific obligations imposed on public school districts related to certification. Among those requirements is a new reporting requirement in Section 1.4B 6 on issues related to employee conduct.

Section 1.4B 6(a) requires that districts report arrests, indictments or convictions of certified educators of any misdemeanor or felony. That requirement is understandable and clearly defined. However, the RIFTHP objects to the following two provisions that require districts to report **allegations** of sexual or romantic activity or physical injury. The RIFTHP objects to allegations being reported to the state education agency. Allegations need to be investigated and actions need to be taken if proof is found. A state agency should not be collecting information related to allegations that may or may not be true. ✓

The RIFTHP also objects to the collection of allegations related to "romantic activity" as that term is too vague and undefined. **Please consider deleting Section 1.4B 6(b) and Section 1.4B 6(c).**

Section 1.4B 6(e) requires districts to report to RIDE resignations or retirements that follow allegations of misconduct. Again, allegations are different than convictions, and districts should not be required to report actions that have not been proven by facts after a thorough investigation. **Please consider deleting Section 1.4B 6(e).**

Section 1.4B 6(f) requires districts to report to RIDE whenever a district provides notice of intent to dismiss, suspend or place an employee on leave for misconduct. This is another provision that violates due process because it requires districts to provide formal notice to RIDE of potential actions that may or may not actually happen pending full investigation of allegations. **Please consider deleting Section 1.4B 6(f).**

Finally, the RIFTHP is unclear of the purpose of these reports. Will RIDE conduct investigations or follow-up in any way once the information is received by school districts? Are you putting RIDE at risk by collecting information and not having a plan to do anything with the information other than put it in a file cabinet? What purpose exists for this extensive reporting requirement?

A more limited reporting requirement could be acceptable to the RIFTHP, but the overly-broad reports generated by the proposal violates due process and creates a repository of allegations at a state agency for no apparent purpose.

Sincerely,

James Parisi
Field Representative

356 SMITH STREET PROVIDENCE, RHODE ISLAND 02908-3761 (401) 273-9800 FAX (401) 331-8815

• Francis J. Flynn, President • Kenneth L. Fontaine, Executive Assistant • Colleen A. Callahan, Director of Professional Issues •
• Michael J. Mullane, Field Representative • James A. Parisi, Field Representative •
• Christopher Lambert, Field Representative • Cynthia Burke, Staff Assistant •



**RITELL Commentary for Consideration by
the Council on Elementary and Secondary Education**

**RE: Proposed Revisions to the Regulations Governing the
Certification of Educators in Rhode Island**

(Modifications to Red-line Certification Regulations Since April 24, 2018)

Respectfully Submitted To the Council on Elementary and Secondary Education: Amy Beretta, Colleen A. Callahan, Karen Davis, Gara Brooke Field, Jo Eva Gaines, Marta Martinez, Daniel P. McConaghy, Chair, Lawrence Purtill

Rhode Island Teachers of English Language Learners; the official state affiliate of TESOL International Association; which represents almost 300 teachers of ELLs in our state, is writing to comment on the proposed revisions to the Regulations Governing the Certification of Educators in Rhode Island. As ESL and bilingual/dual language specialists, we are glad to see some of the changes outlined in this proposal, and feel they will make a positive impact on the academic achievement of ELLs in RI. With respect to other areas, we see a need for further revision or clarification, due to the educational impact they will have on the services provided to English Learners in our state.

Points of concern:

1. Removal of "TESOL" to be replaced with "the appropriate and RIDE approved national professional associations"

We do not understand the rationale for this change; no rationale is provided in the summary of changes. There is currently only one-recognized professional association with approved standards for teachers of English Language Learners and it is *TESOL International Association (TESOL)*. We oppose this change as it does not allow teacher preparation programs to know what standards will be applied to their programs or to their graduates. If the purpose of changing to vague language is "flexibility" we would urge that instead, as new sets of comprehensive and nationally recognized standards emerge for the preparation of Bilingual/Dual Language or ESL teachers, an update be provided to the field acknowledging newly published standards of equivalent standing to those promulgated by TESOL. (Page 82, C.2.f; Page 84, p. D.2.f; Page 85, C.2.e; Page 87, D.2.e; Page 96, G.2.e; Page 97, H.2.e; Page 107, L.2.e; Page 108, M.2.e)

2. Support and expansion of PD requirement to include language requirement for ESL teachers working in Dual Language/ Bilingual settings
 - a. We support the new regulation that ESL teachers may work on the English side of DL and bilingual programs, and we endorse the requirement specified in section D.1.b that individuals holding the ESL teaching certificate who have previously taught for less than two years in a dual language program complete professional learning in the foundations and implementation of

dual language programming as part of their accumulation of professional learning units (PLUs) for certification renewal.

- b. An expansion of these PD requirements is critical to ensure that all teachers working in Dual Language and Bilingual settings have a working knowledge of both languages. Teachers holding ESL certification working in Dual Language and Bilingual settings must demonstrate some language proficiency in the second language, to an intermediate or higher level. We recommend that teachers who do not possess this language requirement seek professional development in the second language, in the form of PD credits or college credits, and achieve intermediate or higher proficiency in the second language. The rationale for this addition is that in a fully functioning Dual Language/ Bilingual setting, all classroom teachers need a working knowledge of both languages, for the purposes of transfer, bridging, co-planning with the co-teacher who teaches in the other language, and to work effectively with families and communities. Further, one of the principal aims of a dual language/ bilingual program is to utilize the home language of ELLs in the classroom, and so it is critical that both teachers demonstrate the value of bilingualism by practicing it themselves, in the classroom and with families.

3. Requirements for Dual Language/ Bilingual teachers to obtain ESL certification

On page 83 (C.3) it states that Bilingual and Dual Language Teachers may obtain ESL certification by demonstrating English proficiency and completing an unspecified amount of coursework in First and Second Language Acquisition and Curriculum, Assessment and Methods for English Learners. While we fully endorse the concept of bilingual and dual language teachers having a pathway to ESL certification that recognizes their existing expertise, we are concerned that Bilingual and Dual language teachers who obtain ESL certification will not be required to have any coursework in English linguistics, and therefore they would not have the knowledge and expertise to identify and teach needed language structures to second language learners of English in order to advance their language proficiency to meet state standards. So while we applaud the fact that RIDE will now support Bilingual and Dual Language Educators in obtaining ESL certification, it needs to be guaranteed to be equivalent to the preparation of those going through approved programs for ESL teachers, as these teachers would be able to work in any ESL setting once certified. (See also page 86, C.3; Page 96, G.3; Page 107, L. 3)

Approved by majority with one abstention by the
RITELL Coordinating Council, September 28, 2018