

Teixeira, Angela

From: John Guertin <guertinized@gmail.com>
Sent: Wednesday, October 03, 2018 8:14 AM
To: Teixeira, Angela
Subject: RIDE certification changes

I have served as an science teacher, elementary guidance counselor, and high school counselor in Warwick for 29 years. Before the pension reform I was looking forward to retirement in two years. I have 2 teenage children who have attended North Smithfield Public Schools. I have a Master's Degree in school counseling which I earned at the same time my wife earned hers. It was very expensive and made a huge impact on our ability to live and save, unlike police and other professions who can go for free. In fact, I am stupefied how many Rhode Islanders can earn their education for free yet teachers pay for every bit of their degrees.

Suddenly after years of dutifully paying for certification renewal (ridiculous amounts of money by the way for a piece of paper) we are looking at 150!!!!!! hours of "professional development" out of the blue at a time I should be preparing for retirement. Consider where I work. Warwick public schools. Do you realize the mess this school department is in? Do you realize that at most 3-6 hours of paid professional development are offered a year?! This year that amount is 0 hours because they say they have no money because for the first time in almost a decade we got a small raise.

All of us have responsibilities to take care of on small salaries. I paid for my masters, cars, a mortgage, raised two kids, and now am looking at a minimum of a half a million dollars for my children's education. I have no expendable money for "professional development". I do not desire any further "professional development". I am angry, disgusted and burnt out as a result of these proposals as are my coworkers. We are still reeling from 2 rounds of pension rape where cola's were taken away, pension amounts severely reduced, and years (sometimes a decade or more) were added to our careers as our lives go by. Now you want more. More time, more money more pounds of flesh. You are angering the teacher population to the point of no return. Damage has been done. What do you see as the end result? I see this trickling down to students. We are supposed to be consummate professionals but take my word there is a limit and we are nearing it. I can see it in my coworker's faces. They are done with it and the abuse and lack of respect you are dishing out.

Imagine a young teacher starting out on a small salary. Bills and unimaginable debt to get where they are. Yet you want more. Imagine someone like me at the end of their career. Full of experience and so valuable but worried about their future due to the loss of years and money (pension "reform") Now you want more.

I have been around long enough to know when there is a rat amongst us and I smell it. This is not about excellence in education and it is not about our children's education. I implore you to hear the teachers and support them rather than shove this down our throats if not for us than for the children of Rhode Island who deserve teachers who are content and supported by their state.

Sincerely
John Guertin, M.Ed.

Teixeira, Angela

From: ljfalvey@verizon.net
Sent: Tuesday, October 02, 2018 2:45 PM
To: Teixeira, Angela
Subject: Teacher requirement changes.

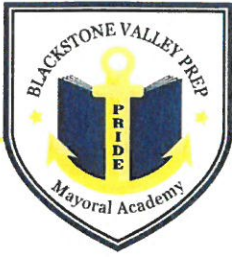
Dear Ms. Teixeira,

I read with dismay the proposed changes to teacher requirements. I have 35 years experience in public schools and have also taught teacher prep courses at the college level. These changes will impose unfair demands on our teachers and further discourage best candidates to enter our ranks at a time when we need to incentivize the best and brightest. Districts should identify and respond to specific needs within their personnel by providing professional development *during the school day* so that colleagues can collaborate with school-based peers long term.

I would respectfully suggest that instead of focusing your efforts on highly qualified veteran teachers you instead look to concentrate on the “fast track” teachers such as TFA who statistically do not last in the classroom and add nothing long term to a district.

Laura Falvey, NBCT, Ph.D

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Blackstone Valley Prep Mayoral Academy

PERSEVERANCE. RESPECT. INTEGRITY. DISCIPLINE. ENTHUSIASM.

October 4, 2018

Barbara Cottam, Chair
Rhode Island Board of Education

Daniel McConaghy, Chair
Council on Elementary and Secondary Education

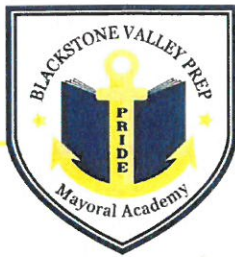
Ken Wagner, Commissioner
Rhode Island Department of Education

255 Westminster Street
Providence, RI 02903

Dear Chair Cottam, Chair McConaghy, Commissioner Wagner, members of the Rhode Island Board of Education and Council on Elementary and Secondary Education:

Thank you for the opportunity to share feedback on the proposed changes to educator certification. My experience of 20+ years working in public education, most of which has been in leadership roles here in Rhode Island, validate important research findings: educator quality is the most important and significant factor in providing an excellent educational opportunity for young people.

Rhode Island's educator certification regulations set important standards for our professionals. At the same time, certification regulations can also be a barrier to allowing talented people to work in our schools. With that in mind, I offer the following comments for your consideration.

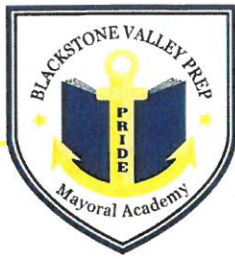


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Positive changes:

- **Registered School Nurse:** 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.*
- **Reciprocity with Massachusetts and Connecticut:** 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.
- **Substitute Teachers 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.*



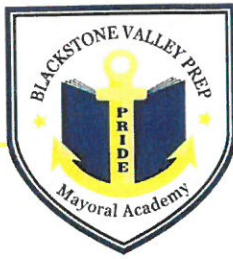
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Still desired changes:

By opening up the regulations of certification, there are still several opportunities the board should consider as it takes on the important work to set a high bar and, at the same time, not create unnecessary barriers to talented individuals working in Rhode Island public schools:

- **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.*
- **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.*
- **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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- **Alternate Route Certification.** The Alternate Route Certification pathway is important to Rhode Island's efforts to increase our teacher pipeline, especially for diverse candidates, non-traditionally trained aspiring educators, and mid-career transitioners. Knowing that the approval process is very rigorous for these programs, candidates should be afforded greater latitude with regards to certification eligibility. For example, the approved program should have the flexibility to sponsor candidates for certification based on the approved program's assessment of content knowledge by reviewing a combination of GPA and standardized test scores. For example, a Political Science major with a very high Praxis exam in math should be allowed to be supported through the alternate program to be a math teacher. Likewise, a candidate with a 2.6 but a high test score should also be eligible for consideration, should the approved program see that the overall talents of the candidate warrant their sponsorship. *By awarding greater flexibility to approved alternate route programs, we will potentially increase our pool of candidates, especially for hard-to-fill positions.*

Finally, I applaud the effort to further improve and further professionalize the industry by requiring annual professional development. Doctors, accountants, lawyers, real estate professionals, to name a few, all require continuing professional education. While I am not certain that an annual requirement of thirty (30) hours is enough or too much, I agree with the initiative.

Sincerely,

Jeremy Chiappetta
Chief Executive Officer
Blackstone Valley Prep

Teixeira, Angela

From: Wagner, Ken
Sent: Thursday, October 11, 2018 3:32 PM
To: Foehr, Lisa; Teixeira, Angela
Subject: Fwd: School Nurse requirement changes

----- Original message -----

From: "Salazar, Shanna" <smolina@blackstonevalleyprep.org>
Date: 10/11/18 3:14 PM (GMT-05:00)
To: "Wagner, Ken" <Ken.Wagner@ride.ri.gov>
Subject: School Nurse requirement changes

Dear Mr. Wagner,

My name is Shanna Salazar and 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 required 8 graduate courses help my or pertain to 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. 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 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 statistics of the importance of having a school nurse and consider the ability for a bachelor's registered nurse to work in a school without the teacher certification.

Thanks,

Shanna Salazar

--

Shanna Salazar School Nurse RN BSN

Teixeira, Angela

From: Eriksen, Susan <susan_eriksen@nksd.net>
Sent: Thursday, October 11, 2018 8:17 PM
To: Teixeira, Angela
Subject: Re: Public comment on Proposed Revisions to the Regulations Governing Certification of Educators

Angela,

Please find in this email the comments I made at the public meeting tonight at North Kingstown High School. It includes some content that was not recorded at the meeting due to time constraints. I want to ensure my complete comments become part of the public review and comments record prior to the Council's vote on the proposed revisions to Certification Renewal.

Comments for 10/11/18 meeting at NKHS
Commissioner Wagner, Council on Elementary and Secondary Ed.

Members of the Council on Elementary and Secondary Education:

Thank you Commissioner Wagner and members of the Council and Department of Education for providing professional educators with this opportunity to offer our perspective on the proposed changes to Certification Renewal.

I am Susan Eriksen, currently a certified teacher in RI and employed by the North Kingstown School Department.

Let me start by saying as clearly as I can that I and many, many of my colleagues are vehemently opposed to the implementation of these proposed changes with regard to the PLU requirement for re-certification of teachers. I think my own professional path speaks to the fact that I am not opposed to professional learning but the nature of these revisions are not in accordance with what the commissioner himself states as the vision for educator professional development in Rhode Island and I urge you to vote against these proposed revisions.

I have been certified in RI since 1994. I earned my teaching credential in Pennsylvania and I have also taught in Montgomery County Maryland. I earned National Board Certification in 2001. I've seen the process for renewal of teacher certification change here in RI four or five times as well as witnessed the process in two other states. Do you have any idea how difficult it is as a professional to maintain a coherent process of professional growth when the way this is measured keeps changing?

I have some general concerns I would like to communicate and I will end with several questions that have come up during my perusal of the document and in discussions with colleagues.

My first concern is with the addition of a PLU requirement on top of the Educator Evaluation Management component that currently exists for certification renewal in RI. Although the latest version of the proposed Revisions removes any direct link to the score educators receive on evaluations to renewal of certification there is no language that I have seen in the revisions that removes EEM from our current responsibilities. So this PLU requirement is in addition to an already labor intensive, time consuming process.

The number, 30 hours, is out of line with any other professional credentialing requirements I was able to find. Other professionals in this state that require continuing education or professional learning don't even come close to this number. By way of example, pharmacists are required to earn 15 hours per year, nurses 10 hours/2 years, occupational therapists-20 hours/year, lawyers 10 hours/year. As a comparison for educators, Connecticut teachers need 18 hours/year and the regulations specifically state the LEA must provide the hours in total at no cost to educators.

In addition, there is language that still allows employers to be able to prevent an educator from renewing their certification with this language

If an applicant for renewal did not obtain employer approval ... the certificate will not be renewed. (p. 58 1.8.3 A Professional Educator Certificate 4 Conditions for nonrenewal a.3a). This same language appears in several other places in the revisions as a condition for non-renewal. This seems overly ambiguous and open to *much* interpretation. Is what is required to **obtain employer approval** defined anywhere in the regulation? I've read the document pretty thoroughly and I was not able to find it. This statement alone is reason enough to go back to the drawing board on these revisions.

The new regulations require educators to take responsibility for completing and paying for PLUs but the authority to approve PLUs lies with the superintendent's office. In addition, these PLUs must be consistent with the *district's* professional development plan as opposed to personal professional growth goals. So as I read these proposed changes, I have all the responsibility but none of the authority to guide my own professional growth. This seems to be in direct contradiction to Commissioner Wagner's opening remarks at tonight's meeting when he referred to not having "one size fits all" professional development. He also said in his remarks that "Now we have nothing." with regard to a professional development requirement. This is not correct. The current Educator Evaluation tool has a fairly robust professional responsibilities component which includes professional learning.

The regulations further define what counts and what doesn't count toward PLUs and what types of activities will be approved. The regulations require 75% of the hours be "sustained" but again lacks a specific tool by which this will be measured or

evaluated. The proposed revisions attempt to define and control our professional learning without providing clear direction to either LEAs or educators themselves as to what those definitions and controls are. It would seem the vision for this program has not been translated appropriately into a working document.

Lastly I want to draw your attention the fact that the personnel does not currently exist at the central administration level to manage, monitor, or report on PLUs to the Department of Education. Yet we are expected as early as 2020 to be using this system for certification renewal? As far as I know, no other profession in this state requires an intermediary in the process for renewal of their professional license between themselves and the state governing board. By placing my certificate in the hands of central administration, I could do everything right, including writing the check, and still not earn renewal based on an administrative glitch or paperwork mistake in a separate office that is newly mandated with overseeing this process. What about towns like East Greenwich where all School Department administrative responsibilities are being consolidated with town administration? I hope Superintendents are weighing in on this as well.

Questions/Suggestions

1. What is the reason for adding a PD requirement to re-certification when there is already a professional development component in the Educator Evaluation Management tool we use? Why keep changing the bar? Why not wait and see if the current system is working?
2. Would it make more sense to build the Educator Course Network with robust, free(or very inexpensive) valuable professional development opportunities and see what happens organically to professional development in the state?
3. Make grant money available to school districts, building faculty or individuals to develop and implement professional learning communities where educators are actually compensated for the time investment they make in their professional learning and that of other educators.
4. Will professional development experiences provided during PD days already required by many districts count toward the PLU requirement?
5. Will costs incurred be compensated by LEA/State?
6. What happens next? What is the process for addressing concerns brought to the attention of the Commission and for approving or not approving these proposed changes to regulations?

I sincerely hope you will carefully consider all of the educator perspectives that have been offered with regard to these proposed revisions and the impact they will have on education in Rhode Island.

Sincerely,

To: Council on Elementary and Secondary Education, RI Board of Education
Subject: Response to the [Proposed Revisions to the Regulations Governing the Certification of Educators in Rhode Island](#) (red-line version dated July 17, 2018)

October 11, 2018

Good evening Chair McConaghy and Members of the Council,

My name is Erin Papa, and I am an Assistant Professor of World Language Education at Rhode Island College. I am here to first object to the process of reviewing these regulations as a full 133 page packet. There are too many important issues here that need to be discussed and examined. I would also like to comment on two that are related to the field of world language education:

- (1) In regards to the certification area All Grades World Language Teacher, Grades PK-12, demonstration of proficiency in the language of instruction should be added to the requirements, as it is similarly stated in the Dual Language Bilingual Educator certification requirements. The content and pedagogy assessments currently required are not tests of language proficiency, and it is imperative that our language educators meet or exceed the American Council on the Teaching of Foreign Languages (ACTFL) minimum of Advanced Low oral and written proficiency to ensure that our students are on a path to bilingualism and biliteracy.
- (2) Regarding 1.8.11., the proposal to create an Expert Residency Cultural Competence Shortages Certificate, I object and urge the Council to remove this from the proposed regulations. We expect all educators to be culturally competent and incorporate culturally responsive practices into their teaching. Specifically, the Rhode Island Professional Teaching Standards and Standards for Educational Leaders require this of all educators. Cultural competency is integral in the field of World Language Education. The World-Readiness Standards for Learning Languages set forth by ACTFL explain, "Because language is the primary vehicle for expressing cultural perspectives and participating in social practices, the study of a language provides multiple opportunities for learners to investigate the relationships between the perspectives and the practices and products of a particular culture, as well as to develop insights about a culture that are available in no other way."¹ Adding a certification area for "Cultural Competence" suggests that this is something only a unique few educators must understand and possess, which is the opposite of our goal to develop a culturally competent teaching force.

Thank you for your time and consideration.

Erin L. Papa, Ph.D.

Assistant Professor of World Language Education, Department of Educational Studies
Rhode Island College

¹ Excerpt From: National Standards in Foreign Language Education Project (NSFLEP).
"World-Readiness Standards for Learning Languages." iBooks.

Teixeira, Angela

From: Donna Rainone <dmrainone@msn.com>
Sent: Friday, October 12, 2018 3:11 PM
To: Teixeira, Angela
Subject: Opposition to SNT changes

I am Opposed to Nurse-Teacher Certification changes proposal. October 2018 I have 10 years of hospital nursing experience and became a school nurse in 1996. School Nurse teachers prepare schools and community to be a safe environment for children and families. We provide community -continuity of health bridging home to school care. Educate parents, teachers and students daily providing knowledge based standards of care. We teach health lessons, puberty classes, hand washing, germs precautions, cover your cough, and sneeze, along with bathroom etiquette, alignment with the health standards. I have been on the health curriculum committee for Warwick Public Schools. Furthermore, support lessons and I have team taught nutrition with the art teacher, as well as safety lessons, and conducted poster contests. Last year I taught hands only CPR with 3-5th grades and 3-6th grades at my school. Donna Tringali (AHA) was trilled. We have great positive energy and combined with reaching into community. I have taught nutrition with donations of yogurt from Chobani, bought bananas, with Fuel up to play 60 money(I had written a grant for). Granted over \$3000 for classroom lessons, music , and playground balls and equipment. Even had the state student Representative representing Rhode Island for Fuel up to play 60. A North Carolina Event 2013. We were honored at the State House. I bring in Hasbro Asthma program for the district, planned yearly, for nearly 10 years to help educate families. This is an evening program, and I work with the families to support their child's Asthma care. They gain greater knowledge and understanding of the disease and how and when to treat. School Nurse Teachers continuously update their knowledge to support practice. We are educated in Epidemiology and are vigilant for our communities, providing surveillance on a day to day basis. I have conducted Diabetes classes, and Heart health lessons. That is a brief overview of my 22 years experience as a school nurse. I have served on the board of RICSNTA committees, in Health Education, and facilitated H1N1 training and MRC (Rhode Island Medical Reserve Corp) as Well as the Wellness company and DOH efforts for the vaccine clinics. I was part of the grass roots Vaccinate Before You Graduate Programs in Rhode Island as the Warwick Veterans High school nurse for 10 years. I have mentored and continue to Mentor URI, RIC, and CCRI nursing Students for the past 20 years. Many School nurses also maintain memberships to professional organizations such as RISNTA, NASN, and RISNA. Being a member provides many educational opportunities for us to support our role as a school nurse. I am happy to meet with you to further discuss this very valuable role as a School Nurse Teacher.

Sincerely,
Donna RainoneRN M.HEd. RICSNTA

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Teixeira, Angela

From: , Mr. Propatier <andrew_propatier@nksd.net>
Sent: Friday, October 12, 2018 10:20 AM
To: Teixeira, Angela
Subject: Comments on changes to regulations governing the certification of teachers.

Hello,

I have reviewed the 132 page document and have noticed many parts have been edited, but still do not see the equity, simplicity, and cost awareness necessary for fair and practical implementation.

On pages 59-62 the professional unit is confusing and appears to aim for quantity over quality. It seems like an attack on the profession and a political design for greed over pedagogy and a better educational culture. Considering that most districts have eliminated aspects of wage increases for acquiring advanced degrees and the existing monumental time constraints of the evaluation model's "paperwork" make this change even more unreasonable.

Please consider reducing the 150 units to 30 units to make a more realistic and equitable design.

In addition and imperative in relation to, also create a RIDE online college, paid for and created by RIDE, where teachers may take online courses to accrue their units due to the extreme fiscal impact of your new rigorous and litigious certification doctrine. The model I am thinking of is like a [Khan Academy](#) for teachers.

Unless RIDE makes changes from the proposal that cuts down the time and financial burden of the current design, teachers will suffer and possibly leave or avoid the profession altogether.

I am certain if changes do not occur a negative impact will be also felt by students, schools, RI citizenry.

Sincerely,

Andrew J Propatier

English Teacher

North Kingstown High School

Teixeira, Angela

From: Holcroft, Leslie <leslie_holcroft@nksd.net>
Sent: Friday, October 12, 2018 12:09 PM
To: Teixeira, Angela
Subject: Comments on proposed changes to teacher certification regulations

Good afternoon,

After attending the hearing last night at North Kingstown High School I would like to share my comments to accompany the ones I listened to from public educators and parents.

Commissioner Wagner began the hearing by making a public comment that included his surprise that 85 positions were left unfilled at the start of the school year in Providence public schools. Though I've heard several certified teacher friends complain that they couldn't even get an interview in Providence public schools, I understand that there is a deficit of teachers across the board both in Rhode Island and nationally. I disagree, however, with the commissioner as to the reason for this deficit. I think that it's pretty clear that fewer people want to become teachers, not because of the rigor and singular pathway of teacher education programs, but because of the constant rollback of teacher benefits, lack of raises to align with inflation, both happening in coordination with increased demands on the job. As a 12th grade English teacher, I spend a lot of time talking to students about their post-high school plans, and becoming a teacher is no longer an attractive career option for our capable and brightest students.

Adding the requirement of professional development hours with restrictions like that of the "10-hour sustained on one topic," essentially forcing teachers to pay for and spend time taking classes, only further burdens teachers who are already over-burdened, and makes the job less attractive to potential candidates, but what I'm extremely concerned about is how this requirement will impact teachers who are new to the profession.

A new hire who has graduated from a teacher education program has just spent a lot of time and money on the education requirements to become a teacher. These individuals start at a salary within which it is difficult to find decent housing. They spend an inordinate amount of time planning lessons and getting accustomed to the grading process and adjusting personal habits to fit around long work days, mentor/mentee requirements, and trying to get involved with clubs and activities at the school followed by weekends of planning, grading, parent phone calls, and possibly the demand of taking on a second job or coaching to bolster their meager salary. There is no time or extra money for new educators to engage in professional development outside the school day. The most important teachers for new hires are their students and the personal conversations they engage in with their colleagues. Statistically, new educators are already at a high risk for feeling so overwhelmed that they give up on the profession altogether before they reach five years of experience. **Please consider allowing first and second year teachers to work toward a professional certificate WITHOUT the requirement of professional learning units or any other type of outside-the-school-day professional development.**

Thank you,

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Leslie E. Holcroft
NKHS English Department
Senior Project Coordinator

Commissioner Wagner:

The proposed certification changes will greatly impact the strength of our educator preparation programs most significantly a requirement that all teacher education candidates must have a full year of student teaching rather than the current requirement of a full semester. The full year is referred to as a full year "residency." The following is a summary of this issue and the negative impacts.

The proposed changes increase the field experience requirement for traditionally prepared teacher candidates to "the equivalent of a one-year practical residency." The institution of "the equivalent of a one-year practical residency" is not a research-based proposal. Research on residencies shows that residency candidates "are no more effective at raising student test scores than other novice teachers in English language arts and less effective in math" (Papa, West, Fullerton, Kane, 2012). This proposal will extend undergraduate students' programs beyond the current four-year to graduation cycle without research-based support for its effectiveness.

Of equal concern this proposal will reduce elementary education students ability to become certified in high need shortage areas. Elementary students are currently able to gain a second certification in TESOL/dual languages within the current 4 years timeline. If the new recommendation for a full year residency is adopted this will no longer be the case. Extending time to certification increases the cost of undergraduate education. This change also has implication for elementary majors completing certification in middle level STEM certification areas and those completing elementary special education. Currently over 40% of elementary major are seeking dual certification in TESOL, middle level mathematics or science or elementary special education. We fully expect this number to increase but the number will be reduced significantly under the current proposal.

References

Papay, J.P., West, M.R., Fullerton, J.B., Kane, T.J. (2012). Does an Urban Teacher Residency Increase Student Achievement? Early Evidence From Boston. *Educational Evaluation and Policy Analysis*, 34(4), 413-434.

David Byrd, Ph.D
Director School of Education
University of Rhode Island