

NEA
South Kingstown

October 11, 2018

Dear Chairwomen Cottam, Chairman McConaghy, and Members of RIDE Council on Elementary and Secondary Education,

My Name is Brian Nelson and I am the President of NEA-South Kingstown.

The NEA-SK is opposed to the new proposed changes to the school nurse certification that creates two pathways. School Nurse Teachers have a unique role in the educational system and are a vital part of the educational team. They are the first line of defense for many students and work collaboratively with teachers, social workers, psychologists, guidance counselors and administrators to provide support and resources.

It is of great concern that that one pathway is not requiring the education needed to prepare the nurse for this role.

We need highly competent nurses in these positions. Students deserve a nurse who can deliver all health services in the educational setting. It is not fair that some students will have better health services due to the qualifications of the certified school nurse. Rhode Island families have an expectation that all school nurses are created equal but if this proposal passes, that will not be the case.

The NEA-SK believes that the current, single certification is the best way to prepare a registered nurse to become a highly qualified School Nurse Teacher for all our public schools. If you have any questions please feel free to reach me via email or phone.

Sincerely,

Brian Nelson

NEA/South Kingstown President

Bri234u@gmail.com

401-580-4665 (cell)

Rhode Island English Learner Advisory Council

c/o MICHAEL NORTHUP, CHAIR
99 RUGBY ST, CRANSTON, RI 02910
EMAIL: MICHAEL.NORTHUP@GMAIL.COM

401-447-3794

October 16, 2018
To: Angela Teixeira
Rhode Island Department of Education
255 Westminster Street
Providence, RI 02903

On behalf of the membership of the Rhode Island EL Advisory Council, we are submitting the following questions, comments, and considerations regarding Regulations Governing the Certification of Educators in Rhode Island that is up for public comment through October 16, 2018.

Commentary for Consideration

1. Removal of "TESOL" to be replaced with "the appropriate and RIDE approved national professional associations"
 - a. This change removes an essential framework in aligning Rhode Island with national and international teacher preparation standards in this field. One proposed option would be to continue to include TESOL as the named national organization until it is replaced by another set of teacher education standards. While this may intentionally be left open to account for future changes, one concern about its removal is that it leaves the criteria by which the professional association would be chosen and replaced vague and open to interpretation. Another option could be to change the wording to "nationally recognized specialized standards" instead of "appropriate" in order to maintain the integrity of the program. Finally, the council is seeking clarification around the change of the use of the plural in "professional associations," which could be changed to reflect that not all areas have more than one association. The changed wording could include "professional association(s)."
2. Support and expansion of PD requirements to include language requirement for ESL teachers working in Dual Language/Bilingual Settings
 - a. The new regulation that ESL teachers may work on the English side of Dual Language and bilingual programs is an important step in addressing the current shortage of teachers in this area. The council is also in favor of the requirement 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.

3. Regarding certification for bilingual and Dual Language Education Teachers
 - a. Regarding the requirement detailed under multiple bilingual and dual language certification requirements (1.9.1. G 3 for example), which states “individuals who may obtain English to Speakers of Other Languages certification by demonstrating English proficiency and completing coursework...” The council believes, that those who teach in a Dual Language program with an ESL certificate should have proficiency at an intermediate or higher level in the target language of the program. Additionally, the council believes that this proficiency requirement should be built in over time, giving the individuals a specific time period to demonstrate this proficiency. In addition, with regards to this coursework requirement, the council recommends that all certs should require coursework in applied linguistics, due to its importance in helping teachers in supporting students’ language development.

4. Additional Considerations

- a. Regarding the requirement under 1.5 h stating “If an applicant prepared for certification at an institution where English was not the language of instruction, verification of minimum passing score or higher on the state’s assessment of English Language Competency,” the council is seeking clarification on which state/which assessment this requirement is referring to.
- ✓ b. The update under section 1.9 “Teacher Certificate Areas” allowing teachers to teach 20% or less of schedule outside of certified areas could create a loophole for non-certified teachers to teach EL courses.
- c. Current regulations dissuade teachers from other states that have TESL certification as a standalone certificate from teaching in Rhode Island, where TESL certification as a standalone certificate is not allowed. Given the current shortage of certified teachers in this area, the council recommends exploring pathways to allow teachers from these states to become certified in Rhode Island.
- d. In some parts of the regulations, the term “English to Speakers of Other Languages” is used while in others, English as a Second Language is used. The use of the terms interchangeably leads to potential confusion and lack of clarity when referring to the certification areas. The council would also like to recommend the use of the term Emergent Bilingual in place of English Language Learner as an inclusive, and asset-based way to refer to students who would benefit from teachers under these certifications.

Respectfully Submitted,
Michael Northup, Chair
Sarah Hesson, Vice Chair for Higher Education
Catarina Anselmo, Vice Chair for K-12 Education
Jackie Nelson, Recording Secretary
Sarah Reis, Membership Secretary



TESL & Bilingual Education Programs
Rhode Island College



Memorandum

To: Council on Elementary and Secondary Education

From: Rhode Island College TESL & Bilingual Education Faculty
Sarah Hesson, Leila Rosa, & Rachel Toncelli

Date: October 9, 2018

Subject: Commentary on Proposed Revisions to the Regulations Governing the Certification of Educators in Rhode Island

Commentary for consideration:

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

As the one nationally recognized association guiding teacher education programs for ESL and bilingual teachers, TESOL/CAEP Standards for P-12 Teacher Education Programs are a fundamental framework in aligning Rhode Island with national teacher preparation standards in this field. Rather than removing the national organization from the RIDE regulations, we propose that if new national organizations are founded, the state agency review their policy accordingly.

2. Support and expansion of PD requirement to include language requirement for ESL teachers working in Dual Language/Bilingual settings
 - a. Given the current teacher shortage in this area, 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. In a fully functioning Dual Language/ Bilingual setting, all classroom teachers need a working knowledge of both languages, for the purposes of transfer, bridging, supports for beginner students during "English-only" time, co-planning with the co-teacher who teaches in the other language, to work effectively with families and communities, and to demonstrate the value of bilingualism by practicing it themselves. An expansion of the proposed PD requirements is critical to ensure that all teachers in Dual Language and Bilingual settings have a working knowledge of both languages. We recommend that ESL-certified teachers working in Dual Language and Bilingual settings 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.

RHODE ISLAND SCHOOL SOCIAL WORKER AFFILIATES

c/o 15 Breana Lane

Warwick, Rhode Island 02886

pat_beauchemin@verizon.net

October 4, 2018

Rhode Island Board of Education
Rhode Island Department of Education
255 Westminster Street
Providence, Rhode Island 02903

Dear Members of the Board:

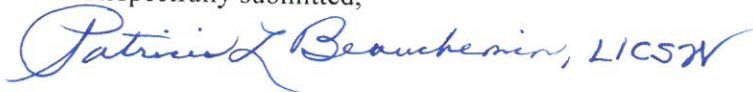
As the spokesperson for Rhode Island School Social Worker Affiliates, I write on the matter before you relative to the creation of a two-path system to hire more nurses to serve in our school districts throughout the state. Our organization stands *in opposition* to any change that would bring registered nurses into the districts without adequate educational preparation for them to serve in our schools. Any attempt to change the current certification process of the certified school nurse teachers fails to understand the critical role of this professional group as an integral component of the educational team.

The notion that school nurses merely distribute Band-Aids to students is an archaic perception of the 20th century. The reality is today's certified school nurse is an active member of the school community educating children in the classroom, communicating with outside physicians and providing important medical trainings to educators and support staff, to name a few of their multi-faceted responsibilities.

School social work practitioner's work collaboratively with school nurse teachers on behalf of students who present with complex medical and mental health needs. It is imperative for those of us who work in educational settings to understand the complicated interplay of dynamics operant in the culture of the schools. Consequently, the specific coursework and training for their certification is wholly unique to certified school nurse teachers, enabling them to enter a school building and "hit the ground running" without having to experience "on the job training". Our children deserve nothing less in health care delivery.

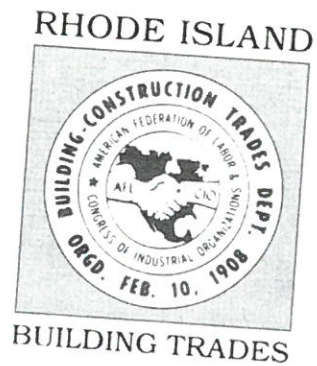
Rhode Island School Social Worker Affiliates urges the members of the Rhode Island Board of Education to maintain the *current and single* certification process for the specialization of certified school nurse teachers.

Respectfully submitted,

A handwritten signature in blue ink that reads "Patricia L. Beauchemin, LICSW". The signature is fluid and cursive, with the first name being the most prominent.

Patricia L. Beauchemin, LICSW

Rhode Island School Social Worker Affiliates, Public Relations



October 15, 2018

Angela Texeira
State of Rhode Island Department of Education
255 Westminster Street
Providence, RI 02903

Re: Teacher Certification

Dear Ms. Texeria:

The Rhode Island Building and Construction Trades Council is comprised of seventeen (17) Local Trade Unions and approximately 9,500 members. On behalf of the officers and members of our council, I am writing to support the proposed changes to the teacher certification standards as drafted.

Please let the undersigned know if you need additional explanation or commentary. Thank you.

Very truly yours,

/s/Michael F. Sabitoni
Michael F. Sabitoni
President

410 South Main Street, Providence, RI 02903



New England Laborers' / Cranston Public Schools
Construction & Career Academy

4 Sharpe Drive Cranston, Rhode Island 02920

Tel: 401.270.8692

Fax: 401.270.8697

October 12, 2018

To Whom It May Concern:

The NEL/CPS Construction & Career Academy is in full support of the proposed changes to the regulations regarding CTE teacher certification. It is our understanding that these changes to the regulations aim to modify the educational requirement to match that of the industry in which the teacher is instructing. In many cases this is a bachelor's degree or an advanced degree but may be an associate's degree or a high school diploma with relevant industry specific training and experience.

We respectfully request your support for these changes.

Thank you,

Dennis Curran
Executive Director
NEL/CPS Construction & Career Academy

Website: <http://nelcpscca.wix.com/nelcpscca>

01.270.8115

TDD:



**WARWICK
TEACHERS
UNION, AFT**
RIFT, AFL • CIO

Darlene Netcoh
PRESIDENT

October 16, 2018

To the Members of the Rhode Island Board of Education:

As president of the **Warwick Teachers' Union**, I represent almost **nine hundred teachers**. I am writing to inform you that the teachers that I represent and I all oppose the revisions to certification renewal that the Rhode Island Board of Education have proposed. While many of these proposed changes are unduly onerous, time-consuming, and costly to individual teachers, some are insidious attempts to undermine the profession and the public-school teachers who have spent years training for their roles and honing their craft and have dedicated their lives to their students and their profession. As a classroom teacher of secondary English for thirty-one years in Rhode Island, I have experienced the vicissitudes of the whims and fancies of both RIDE and the Board of Education. I correctly predicted the demise of the burdensome and ultimately unsustainable "I-Plan," over which many teachers agonized, until RIDE yanked it. For the last few years, the certification renewal process rested on the RI Model Evaluation System, another time-consuming and wasteful system, which the Board of Education is now ignoring after upended teachers' lives. Now comes another host of unduly burdensome requirements. For many reasons, I urge you to vote against these changes.

First, the **professional learning unit (PLU)** requirement of 150 hours over five years will be a burden to teachers because of the amount of time teachers will need to spend and the amount of money they will need to invest. In other professions, employers pay for and provide the training that they wish their employees to receive. The PLU requirement will require teachers to seek out and pay for their training. Additionally, RIDE is adding the requirement that teachers will have to align their PLUs to their district's desires. If a district wants teachers to attain certain professional development, then the district can provide and pay for it, as other professions do. Furthermore, the PLU plan states that districts and superintendents are to approve PLUs. If RIDE is the certification-conferring body, then RIDE should have that authority. Also, since there is no appeal process, teachers will be stuck with whatever the district or superintendent decides, which could result in a great cost of time and money to teachers. This PLU proposal does not call for RIDE to provide resources for managing a PLU system, so individual teachers and districts will add that responsibility to the myriad responsibilities they already have in order to educate students, which is their primary responsibility.

Secondly, many of the changes make a mockery of our profession. Allowing, or probably forcing, teachers to **teach 20%** of their schedule in an area in which they are not certified is not an educationally sound proposition. Teachers obtain their certifications in areas in which they have degrees. Students deserve teachers who are experts in their subject area. The only purpose this proposed change serves is so that districts can eliminate teachers. Additionally, Career and Technical Education teachers should have at least a bachelor's degree. Another issue is the nebulous concept of "**Cultural Competence**." No one knows **what this term means**, let alone whether anyone can actually evaluate whether or not someone has achieved "Cultural Competence." Another problematic proposed revision is the elimination of the **certified school**

nurse teacher, which a 1976 legislative mandate requires. Finally, substitute teachers should have at least a bachelor's degree and ideally some coursework in education so that they are prepared to meet the intellectual and other challenges that will await them in the classroom. All of these proposed revisions will negatively affect the education that students in Rhode Island deserve. They make a mockery of the profession because they will allow unqualified individuals in the classroom. For many years, we teachers have strived to become highly qualified certified professionals, as RIDE has required. Do not allow the devolution of education in Rhode Island.

Finally and most egregiously, RIDE wants to increase the field experience requirement for traditionally prepared teaching candidates to "the equivalent of a one-year practical residency" while it continues to allow much less rigorous requirements for Teach For America (TFA) and other Alternate Route candidates. As a "traditionally prepared" teacher, I take great umbrage at a proposal that seems to imply that those who attend college and become teachers are less capable or worthy than those who have little or no training or education in the field at all. When I graduated from Brown University with an AB in English and American Literature, I had also completed Brown's Undergraduate Teacher Education Program. As part of this program, I did a practicum at Hope High School and taught Rhode Island high school students in the Brown Summer High School before I did a semester of English student teaching at Toll Gate High School in Warwick. All of these experiences provided me with the foundation to become a highly qualified, "highly effective" secondary English teacher for thirty-one years. Teach For America teachers can only handle the profession for a few years at most before they move on to do something else that they consider more worthy of them and is probably more lucrative. Another proposed change is that there would be a required sixty hours of field experience in addition to the one-year residency. This revision would add a financial burden to the prospective teacher, and it could be a barrier to attracting a more diverse group of individuals to the teaching profession. Instead of the one-year residency and the sixty hours of field experience, perhaps RIDE could implement a mentorship program for new teachers. A mentorship program would allow newly certified teachers to work and earn an income, while they still receive guidance as they enter the field. Personally, as a traditionally prepared teacher, I am against TFA and other Alternate Route programs, because those teachers do not know or do what the rest of us know and do. However, if RIDE is still going to allow TFA, then whatever it decides regarding teacher preparation programs, the regulations should apply equally to traditionally prepared teachers and TFA and other Alternate Route candidates.

You, the members of the Rhode Island Board of Education, have the ability and the responsibility to provide oversight for the Rhode Island Department of Education and to reign in RIDE if proposed regulations are not only onerous and unfair but also, and more importantly, educationally unsound. On behalf of the nine hundred teachers in Warwick, of which I am one, I respectfully request that you reject all of the proposed revisions to Rhode Island Regulations Governing Educator Certification.

Sincerely,



Darlene Netcoh
President



Lori A. Ferguson
Director
fergusonlari@coventryschools.net

Regional Career & Technical Center at Coventry High School

40 Reservoir Road • Coventry, Rhode Island 02816 • Tel: 401-822-9499 x287 • Fax: 401-822-9492

October 15, 2018

Stephen Osborn
Chief Office of Innovation
255 Westminster St.
Providence, RI 02903

Re: Proposed Teacher Certification Changes

Dear Mr. Osborn:

I am writing to you today as the the chairperson of the Rhode Island Career and Technical Education Directors to give our full support for the proposed changes to teacher certification, **specifically to career and technical certification**. In doing so, we hope that these changes will significantly reduce and possibly eliminate the major obstacles we have faced to finding quality and qualified teachers in a variety of career and technical areas. We would like to thank you and your team for addressing our concerns in regards to Career and Technical educator certification.

Sincerely,

Lori A. Ferguson

Lori A. Ferguson
Director
Chair RI Directors Association

Teixeira, Angela

From: Osborn, Stephen
Sent: Friday, October 12, 2018 11:23 PM
To: Teixeira, Angela
Subject: FW: Teacher Certification Regulations

Angela - Let me know if you received the email below related to the teacher certification regulations.

-----Original Message-----

From: Al Lubrano [mailto:dadsk2s@cox.net]
Sent: Thursday, October 11, 2018 5:09 PM
To: Angela.Teixeira@RIDE.RI.GOV
Cc: Osborn, Stephen <Stephen.Osborn@ride.ri.gov>
Subject: Teacher Certification Regulations

Dear Angela,

Please note that I am fully aware of and support these changes to the regulations for the Teacher Certification requirements.

Sincerely,

Al Lubrano, Chair CTE Board of Trustees Sent from my iPhone

Teixeira, Angela

From: Tuttle, Charlene
Sent: Sunday, October 14, 2018 12:09 PM
To: Teixeira, Angela
Cc: Charlene Tuttle
Subject: Educator Cert-comment on proposed changes

Hi Angela,

I'm sending some ideas from conversations with teachers in **Jamestown and District Teachers of the Year**. Thanks for gathering all of these and considering changes in the proposed document.

Ideas for changes:

1. Ideas for PD hour times-Provide more clarity on WHEN the hours can be counted. For example, traditionally, PD hours are outside of school hours.

However, if teams need to work on PLC together, sometimes their outside schedule doesn't allow this. Perhaps meeting during school time-planning periods, lunch,etc could count and then their planning period work (correcting, planning, research, designing) can be done on their outside time, allowing for more opportunity for effective collaboration.

Suggested: at least 30% can be during work hours.

2. There is terminology that allows for award winners to extend certification renewal time to 7 years if they receive Milken, RISTOY, National Board Cert, or PAEMST during that 5 year period.

Suggested to add at least one opportunity for past winners to apply theirs to 7 year increments. (Ideally, 7 year renewal for each award)

As it is written, there is no opportunity to be recognized for past achievements with regards to cost reduction of renewal or recognition of excellence in terms of need to renew.

Suggestion to recognize District TOYs as an award worthy of extended time, as well, due to the time involved in additional role as district liaison.

3. Some people wondered about Llifetime Certification and suggested that this remain. They couldn't find in doc. Is this still in effect?

If not, can it somehow be recognized, and alleviate the impact of transitioning to regular renewal? For example, give a 7 year timeline for renewal for these folks, as is recommended for those in #2 above

Thank you for all of your hard work and details on this!!!

If you need clarification or expansion on any of this, please let me know.

I am on the 4th floor at RIDE on Wednesdays!

Charlene Tuttle
2019 RI Teacher of the Year



Rhode Island College
Feinstein School of Education and Human Development
Department of Health and Physical Education

October 11, 2018

Rhode Island College's Feinstein School of Education and Human Development and the Health and Physical Education Department hold the unequivocal position that the School Nurse Teacher role and its 8-course graduate-level certification process be left unchanged. School Nurse Teachers are trained educators, with certification in pedagogy and classroom management, they are prepared to develop and implement evidence-based health programs, and they deliver curricula to intact classrooms, and large-group workshops to students at all grade levels. The courses fully prepare School Nurse Teachers to adhere to the mandated RI Professional Teaching Standards (RIPTS) and the RIDE Comprehensive Health Instructional Outcomes, required for anyone who teaches in schools, including health education.

If the Council does decide to move to create a separate Pathway for *supplemental* School Nurses who do not engage in any teaching or other educational activities, the Feinstein School stipulates that the words "teacher" and "educator" should *not* be part of the title, and these supplemental School Nurses should not be in classrooms in any capacity. Further, a School Nurse in this role should not consult in decisions related to individualized education plans or school environment safety plans, as these nurses would not be prepared to develop accommodations that ensure that children's educational needs are met. If School Nurse Teachers are professionals who teach health education, even in a very small way, they should be held to all applicable standards and to any new initiatives for RI teachers, and should obtain SNT Certification.

Sincerely,

Rhode Island College Health and Physical Education Faculty

To: Council on Elementary and Secondary Education, RI Board of Education
From: Feinstein School of Education and Human Development (FSEHD) at Rhode Island College (RIC)
Date: October 16, 2018
Subject: Response to the [Proposed Revisions to the Regulations Governing the Certification of Educators in Rhode Island](#) (red-line version dated July 17, 2018)

While many of the proposed revisions in this document will improve the quality of teacher certification in our state, we the faculty and administration of the Feinstein School of Education and Human Development at Rhode Island College respectfully object to the following revisions proposed to the RIDE Regulations Governing Certification of Educators in Rhode Island:

1. **Reviewing as a Full Packet:** We object to the process of reviewing and voting upon these regulations as a unified 133 page packet. There are too many important issues included that require substantive discussion and we advocate for specific decisions based on research around each area under consideration. These significant issues should not be voted upon as one.
2. **One-Year Practical Residency:** We believe in increasing clinical experiences for teacher candidates, but disagree that a prescribed one-year residency is the only (or even the most effective) path to this desired outcome. We see this requirement as detrimental to our commitment to diversifying the teaching profession given that students from minoritized communities -- namely working class, first-generation college students -- would find a year-long residency an untenable burden. It would also be problematic for other reasons: finding high quality extended placements, cooperating teacher burnout, inability for teacher candidates to finish degree requirement in four years, financial burden to institutions of higher education, and scheduling conflicts between higher ed and K-12 calendars. Thus, we object to the change from "Student Teaching" to "One-Year Practical Residency." We appreciate the flexibility implied by the addition of the word "equivalent"; however, this still leaves us with many concerns about practical implementation. Meaningful and responsible expansion of clinical practice requires longer-term planning among all key stakeholders: RIDE, postsecondary education, school districts, teachers' unions, legislators, school committees/boards, and funders, as outlined in the [RI Strategic Plan for Education 2015-2020](#) Priority 1: Teacher and Leader Support. If expanded clinical preparation is to lead to improved outcomes for all K-12 students, we need to build complex systems of collaboration to imagine the best way to increase time in the field.

3. Changes Affecting ESL and Dual Language Bilingual Education:

We oppose two major proposed changes that will affect ESL and Bilingual Education certification programs. First, we oppose the removal of “TESOL” to be replaced with “the appropriate and RIDE approved national professional associations.” As the one nationally recognized association guiding teacher education programs for ESL and bilingual teachers, TESOL/CAEP Standards for P-12 Teacher Education Programs are a fundamental framework in aligning Rhode Island with national teacher preparation standards in this field. Second, in a fully functioning Dual Language/ Bilingual setting, all classroom teachers need a working knowledge of both languages, for the purposes of transfer, bridging, supports for beginner students during “English-only” time, co-planning with the co-teacher who teaches in the other language, to work effectively with families and communities, and to demonstrate the value of bilingualism by practicing it themselves. Given the teacher shortage in the state, we support the new regulation that ESL teachers may work on the English side of Dual Language/ Bilingual programs, but we oppose the scope of the PD credits proposed for these teachers. Instead, we propose an expansion of the proposed PD requirements to include a language requirement for all ESL teachers working in Dual Language/Bilingual settings, to gain intermediate or higher proficiency in the partner language of the program through PD or college credit.

4. Creation of an Expert Residency Cultural Competence Shortages Certificate (1.8.11):

We at the FSEHD are deeply committed to cultural competency as the foundation of educator preparation. We object, however, to the creation of this certificate and request its removal 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 already require this of all educators. Culturally responsive teaching is not optional, and it should not be relegated to a few “experts” who are certified. Thus, there should be no expert residency certificate based upon cultural competence. In this rapidly diversifying state, we need ALL of our teachers to be culturally responsive in their teaching.

5. **School Nurse Teacher:** The School Nurse Teacher role and its 8-course graduate-level certification process should be left unchanged. School Nurse Teachers are trained educators, with certification in pedagogy and classroom management; they are prepared to develop and implement evidence-based health programs, and they deliver curricula to intact classrooms and large-group workshops to students at all grade levels. The courses fully prepare School Nurse Teachers to adhere to the mandated RI Professional Teaching Standards (RIPTS) and the RIDE Comprehensive Health Instructional Outcomes, required for anyone who teaches in schools, including health education.

If the Council does decide to move to create a separate Pathway for supplemental School Nurses who do not engage in any teaching or other educational

activities, the Feinstein School officially adopts the following position: The words “teacher” and “educator” should not be part of the title, and these supplemental School Nurses should not be in classrooms in any capacity. Further, a School Nurse in this role should not consult in decisions related to individualized education plans or school environment safety plans, as these nurses would not be prepared to develop accommodations that ensure that children’s educational needs are met. If School Nurse Teachers are professionals who teach health education, even in a very small way, they should be held to all applicable standards and to any new initiatives for RI teachers, and should obtain SNT Certification.

Thank you for your consideration of these important issues that will impact students, teachers, teacher candidates, K-12 schools, institutions of higher education, teaching and learning in our state.

Signed by the following faculty of Rhode Island College:

Charles H. McLaughlin, Jr.
Robert Franzblau
Karen Castagno
Marie A. Lynch
Sara Blessing RN CSNT
Janet D. Johnson
Sarah Hesson
Jenlyn Furey
Robin Kirkwood Auld
Ellen Bigler
Lesley Bogad
Cheryl L. Williams
Erin Papa

Julie Horwitz
Caroline Johnson Caswell
Jason Santo
Jeremy Benson
Lisa Owen
Rachel Toncelli
Gerri August
Jennie Schwab
Rebecca Shipe
Rudolf Kraus
Victoria Restler
David Brell



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 •



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

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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 •

Professional Development Units

1. Item b on page 53 is not clear on the phrase – ‘For certificates expiring between January 1, 2020 and August 31, 2020,’ all certs expire on Aug 31, 2020, so who will fall between the 2 dates? Exactly who needs 30 credits vs. 90 credits? And how do we filter for them? Should this be by issue dates?
2. At this time there are 2,182 certificates that are up for renewal in 2020, not counting additional certificates that could be added by educators in the interim, and will be aligned to that date.
3. Same issue with Professional certificates on page 55
4. If we care about the PLUs, then we must provide a way to track the. Even if we only audit a percent of the cases, we need the data in a comparable format, it does not behoove us to accept PLU completion verification in myriad different ways.
5. The ‘Not employed’ exemption on page 54 is problematic as we know how unreliable PAS data can be. If the educator is not reported in the PAS, our system will count them as not employed. When the educator comes to us years after the PAS is closed, we will not change the work assignment data.
6. Also, this goes against the reassurances we have given to educators that we only collect this information for aggregate data reporting and will not impact their future retirement etc. Now it will impact their future certification.
7. Consider these scenarios:
 - a. If an educator with 2 initial certificates does not complete their PLUs, and forfeits their certificate, the reinstatement rules allow them to come back on Day 300 (within one year), Pay \$100+\$50+\$100 for reinstatement fees and get their certificates back for another 3 years.
 - b. However, if they apply for the Special Provisional Certificate, they will pay \$100+\$50+\$200 for the special provisional, and get their certificates back for one year only. And they have to show completion of PLUs on top of that.
 - c. Option A seems to be more attractive.

CTE Certificate

8. Item b on top of Page 70 is worded awkwardly.

Expert Residency Shortage Areas

9. Expert residency Shortage areas – If a shortage area changes between the time the educator gets the 3 year and renews for the 4 year, does it change the renewal decision?
10. Will we now run the Shortage Areas report only every 5 years?
11. Cultural Competence as an area of shortage is too nebulous.
12. The section ‘RIDE will identify shortage areas at least every five years and seek the approval of the Council on Elementary and Secondary Education for these identified areas. Potential shortage areas will be identified based on national trends in annual federal loan forgiveness, local trends in high needs areas as well as **local areas of Cultural Competence** and School Business Administrator.’ How does one establish local areas of cultural competence?

13. Even if the educator is eligible for an emergency cert, the LEA could request the Expert Residency as it costs less for the educator, and lasts longer (\$200 for 7 years). Is that problematic?

Long term Sub:

14. Assignments that are under 40 days need not hold the appropriate cert. That will open up the potential for manipulation of the data in PAS to avoid the Out of Area error.

20 percent rule:

15. This too will lead to using the PAS to bypass the rule. It does not make sense to add a rule that is very difficult to enforce.

Foehr, Lisa

From: Ochs, Daniel
Sent: Friday, October 12, 2018 8:59 AM
To: Foehr, Lisa
Subject: RE: <RR 10-12 9:00 AM> adjustments following public comment

Hey Lisa,

I have been thinking this through off and on, and here's where I've landed.

- 1) We could cut the hours from 30 to 25, though as we discussed yesterday, it probably makes sense to wait until after the council meeting for that.
- 2) Currently we have a requirement that districts create a plan, but we don't specify exactly what percentage of required hours they have to supply. This could get into the category of unfunded mandate, but we could specify a percentage they have to cover (50%, something like that). It might help to relieve the pressure coming from the financial burden argument, and we want to encourage site based things anyway. I'm not sure I love this, just an idea.
- 3) Don't back down on the SNT.
- 4) Mutual agreement language makes sense of teaching out of area.
- 5) Overall on the PD, people are going mentally to things they pay for. That's the opposite of what we want. It's unfeasible, but in an ideal world college classes wouldn't even be part of this. We want site-based, job-embedded, and tied to curriculum implementation. We want it to happen in well-led collaborative teams. The cost is time, making sure schedule support this. So, radical idea, what if we require a percentage of the units to meet the description above, and ditch the sustained requirement. I think it's actually more prescriptive and we would need to think more about it, but if the sustained thing freaks people out and we're not actually getting what we intend in implementation of these regs, this could be a way to go.

Dan

From: Foehr, Lisa
Sent: Wednesday, October 10, 2018 9:07 PM
To: Keenan, Mary <Mary.Keenan@ride.ri.gov>; Ochs, Daniel <Daniel.Ochs@ride.ri.gov>; LaBounty-McNair, Steven <Steven.LaBounty-McNair@ride.ri.gov>; Whiting, Sarah <Sarah.Whiting@ride.ri.gov>; Annavarjula, Shoba <Shoba.Annavarjula@ride.ri.gov>
Subject: <RR 10-12 9:00 AM> adjustments following public comment

Hi Everyone,

Between the October and November Council meetings we will spend some time working through concerns they might have. For the October 23 meeting we will consider any changes we believe are the right changes to make based on public comment. Mary Ann, Ken and I are meeting at the end of the day Friday to talk through possibilities. Each of you is familiar with the proposed regulations and have heard verbal comment and/or read written comment.

Based on what you've read or heard, is there anything that has caused you to think we should suggest a change? For example, we heard concerns about the 20% allowance and people being forced to teach things in areas they are not qualified. We could consider an adjustment to the language that makes it clear there needs to be mutual agreement. We've heard a lot about the burden and cost associated with 150 units as well as

some distrust about local level approval. We've also heard a lot about the school nurse teacher proposal. Are there adjustments you have thought we should consider as a result?

I'm interested in what you all think.

Thanks,
Lisa

Lisa M. Foehr
Chief
Teaching & Learning
Rhode Island Department of Education
255 Westminster St. Providence, RI 02903
www.ride.ri.gov
[401.222.8809](tel:401.222.8809)

Foehr, Lisa

From: LaBounty-McNair, Steven
Sent: Friday, October 12, 2018 7:07 AM
To: Foehr, Lisa
Subject: Re: <RR 10-12 9:00 AM> adjustments following public comment

Hi Lisa,

After having reviewed the survey, and attended the hearing last night, I would agree with those themes you mentioned here. I thought there was something to be said about stipulating that the alternative pathway for school nurses ask for add'l coursework that would pertain to bringing an educational lens to medical/clinical experience(s). Not my area of expertise - but it gave me pause last night.

The conversations about PLUs gave me pause as well, because I've been part of this from the outset. I have wondered if the language is clear enough about the ability to have in-district, embedded PL. I know there will be district-level equity issues at the outset, because some offer more than others, but what *is* clear, is that this will phase in over time with renewal cycles. So, this is where I could see guidance documents being really important if the regs are passes as they're written now. Would going to 25, in place of 30 PLUs show support for some of the concerns? Are we clear enough on what 'sustained' really means, both at the activity-level, and in relation to the 75% sustained requirement? I know the ECN will be a marketplace - but there is *choice* to participate in that - so I wonder if districts working to 'reimagine' their in-district PL, without external support, will have the same access to the requirement for sustained PL. I could see this as an equity issue that would require technical assistance from us.

I'm happy to talk in person if that's easier - but I have thought about this all week and I can see room for discussion on these points among the Council members & RIDE leadership.

Thanks for asking for our input. I'm glad I've been able to "see" this process from the outset.

Best,
Steve

From: Foehr, Lisa
Sent: Wednesday, October 10, 2018 9:06:40 PM
To: Keenan, Mary; Ochs, Daniel; LaBounty-McNair, Steven; Whiting, Sarah; Annavarjula, Shoba
Subject: <RR 10-12 9:00 AM> adjustments following public comment

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Between the October and November Council meetings we will spend some time working through concerns they might have. For the October 23 meeting we will consider any changes we believe are the right changes to make based on public comment. Mary Ann, Ken and I are meeting at the end of the day Friday to talk through possibilities. Each of you is familiar with the proposed regulations and have heard verbal comment and/or read written comment.

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I'm interested in what you all think.

Thanks,
Lisa

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Rhode Island Department of Education
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www.ride.ri.gov
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