

The RIFTHP asks that RIDE, not school staff, have authority to approve PLUs.

Section 1.8.5 lacks an appeals process to resolve disputes over district and Superintendent decisions related to PLUs and teacher certification. The RIFTHP asks that an appeals process be included in the regulations.

Section 1.8.5 G imposes a burden on school districts for managing a PLU system. It also imposes a burden on classroom teachers for the manual or electronic storage of records for a five- year period without an appropriate mechanism or platform. The proposed regulations do not require RIDE to provide resources even though RIDE, not the district, is the recipient of teacher certification fees.

The De-Professionalization of Teaching

Section 1.9 allows teachers to teach 20% of their work load in an area in which they are not certified. This undermines the very essence of mandatory content specific certification and represents significant erosion of the certification process and the value of students being taught by highly qualified certified professionals. The RIFTHP asks that this provision be deleted.

Section 1.2A43 creates a sub-category of Registered School Nurse which is a departure from a 1976 legislative mandate that requires districts to employ certified school nurse teachers. The RIFTHP asks that this provision be removed.

Section 1.9.4D2c,h changes the certification requirement for CTE teachers. Currently, Career and Technical Education Teachers must hold a bachelor's degree from an accredited institution. The RIFTHP asks that the BA requirement be restored as it is the only area of certification in which a bachelor's degree is not required.

Section 1.8.11 proposes an Expert Residency Shortages Preliminary Certificate based on an undefined concept referred to as Cultural Competence. The RIFTHP asks that this vague, undefined concept not be included in the new regulations.

Section 1.12A2b would allow individuals with two years of college or an associate degree to serve as substitute teacher. Current regulation requires a minimum of a bachelor's degree. The RIFTHP asks that the bachelor's degree requirement be restored.

Negative Impact on Pre-Service Candidates

Section 1.6C2 increases the field experience requirement for traditionally prepared teacher candidates to "the equivalent of a one-year practical residency" while continuing to allow Teach For America and other Alternate Route candidates to be certified based on a less rigorous requirement. This will cause a challenge in needing additional placements for student teachers, additional clinical faculty and cooperating teachers and the possibility that fewer schools / cooperating teachers will be willing to take student teachers for an entire year. The RIFTHP recommends that either the one-year residency be reconsidered or that **Section 1.8.6** be

amended to require one-year residency for alternative route candidates.

Section 1.6C2 also maintains a required 60 hours of field experience in addition to the one-year residency. This imposes a significant financial and time burden on students. This proposal would add tuition costs and could be a barrier to attracting a more diverse group of individuals into the teaching profession. The RIFTHP requests that the sixty-hour field experience be considered a part of their practical residency requirement and not an addendum.

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**RHODE ISLAND FEDERATION
OF TEACHERS AND HEALTH
PROFESSIONALS**

**To: Council on Elementary and Secondary
Education**

From: [Your Name]

A package of sweeping changes to Rhode Island Regulations Governing Educator Certification was approved for public hearing by the Council for Elementary and Secondary Education. These changes will have a significant impact on every current and future educator in our state. The

RIFTHP is pleased that teacher evaluations will no longer be associated with certificate renewal. The leaders of the RIFTHP have carefully examined these proposed changes and have numerous concerns.

Onerous Annual Professional Development Requirement

1.) The RIFTHP believes that thirty hours per year for every teacher is arbitrary and unnecessary and asks that the annual PLU requirement be reduced.

2.) The RIFTHP believes that the 75% sustained requirement is unreasonable. If a district determines that it is a priority for its staff members to develop a specific skill or body of knowledge, then the regulations should require that it should be the district's responsibility to provide it for all employees.

3.) the proposed changes shift both the logistical and financial responsibility away from the both RIDE and the District and onto the backs of the classroom teacher. The proposal fails to require that the districts provide PLUs that are sustained and aligned to district initiatives.

Lack of a Systemic Process or Service Delivery Model

1.) The RIFTHP asks that RIDE, not school staff, have authority to approve PLUs.

2.) The proposed certification changes lack an appeals process to resolve disputes over district and Superintendent decisions related to PLUs and teacher certification. The RIFTHP asks that an appeals process be included in the regulations.

3.) Proposed changes impose a burden on school districts for managing a PLU system. It also imposes a burden on classroom teachers for the manual or electronic storage of records for a five-year period without an appropriate mechanism or platform. The proposed regulations do not require RIDE to provide resources even though RIDE, not the district, is the recipient of teacher certification fees.

The De-Professionalization of Teaching

1.) A proposed certification change would allow teachers to teach 20% of their work load in an area in which they are not certified. This undermines the very essence of mandatory content specific certification and represents significant erosion of the certification process and the value of students being taught by highly qualified certified professionals. The RIFTHP asks that this provision be deleted.

2.) A proposed change would create a sub-category of Registered School Nurse which is a

departure from a 1976 legislative mandate that requires districts to employ certified school nurse teachers. The RIFTHP asks that this provision be removed.

3.) Currently, Career and Technical Education Teachers must hold a bachelor's degree from an accredited institution. The RIFTHP asks that the BA requirement continue to be required as it would be the only area of certification in which a bachelor's degree is not required.

4.) A proposed change proposes an Expert Residency Shortages Preliminary Certificate based on an undefined concept referred to as Cultural Competence. The RIFTHP asks that this vague, undefined concept not be included in the new regulations.

5.) Another proposed change would allow individuals with two years of college or an associate degree to serve as substitute teacher. Current regulation requires a minimum of a bachelor's degree. The RIFTHP asks that the bachelor's degree remain a requirement .

Negative Impact on Pre-Service Candidates

1.) Proposed changes would increase the field experience requirement for traditionally prepared teacher candidates to "the equivalent of a one-year practical residency" while continuing to allow Teach For America and other Alternate

Route candidates to be certified base on a less rigorous requirement. This will cause a challenge in needing additional placements for student teachers, additional clinical faculty and cooperating teachers and the possibility that fewer schools / cooperating teachers will be willing to take student teachers for an entire year. The RIFTHP recommends that either the one-year residency be reconsidered or that Section 1.8.6 be amended to require one-year residency for alternative route candidates.

2.) This same section also maintains a required 60 hours of field experience in addition to the one-year residency. This imposes a significant financial and time burden on students. This proposal would add tuition costs and could be a barrier to attracting a more diverse group of individuals into the teaching profession. The RIFTHP requests that the sixty-hour field experience be considered a part of their practical residency requirement and not an addendum.

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

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Objections To Proposed Revisions To Rhode Island Regulations Governing Educator Certification

SIGN THIS PETITION

 **COUNCIL ON ELEMENTARY AND SECONDARY EDUCATION**



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Comments

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Objections To Proposed Revisions To Rhode Island Regulations Governing Educator Certification

A package of sweeping changes to Rhode Island Regulations Governing Educator Certification has been approved for public hearing by the Council for Elementary and Secondary Education. These changes will have a significant impact on every current and future educator in our state. The RIFTHP is pleased that teacher evaluations will no longer be associated with certificate renewal. The leaders of the RIFTHP have carefully examined these proposed changes and have numerous concerns. Below is a summary of the changes which most significantly impact our members.

You may receive updates from *Rhode Island Federation of Teachers and Health Professionals*, the sponsor of this petition.

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Onerous Annual Professional Development Requirement

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Section 1.8.2 mandates 150 hours (average of 30 per year) over a five-year period of professional learning units (PLU.) The RIFTHP believes that thirty hours per year for every teacher is arbitrary and unnecessary and asks that the annual PLU requirement be reduced.

Section 1.8.5 B and C requires that 75% of the PLUs be “sustained” and emphasizes alignment to district priorities. The RIFTHP believes that the 75% sustained requirement is unreasonable. If a district determines that it is a priority for its staff members to develop a specific skill or body of knowledge, then the regulations should require that it should be district's responsibility to provide it for all employees.

Section 1.8.5 shifts the both the logistical and financial responsibility away from both RIDE and the District and onto the backs of the classroom teacher. The proposal fails to require that the districts provide PLUs that are sustained and aligned to district initiatives.

Lack of a Systemic Process or Service Delivery Model

Section 1.8.5 D,E,F gives Districts and Superintendents authority to approve PLUs. By law, the responsibility and management of granting, renewing and revoking teacher certification is solely a function of the RIDE. The current proposal represents a clear abdication of responsibility.

Teixeira, Angela

From: Deborah Blake <Deborah_Blake@ewg.k12.ri.us>
Sent: Tuesday, October 02, 2018 8:53 PM
To: Teixeira, Angela
Subject: Proposed 150 credits

Hello Ms. Teixeira:

Although I have many questions (and opinions) regarding the revision to certification renewal and plan to attend the public forum in North Kingston later this month, I am reaching out to you with a question that is hopefully an easy reply on your end.

I see from the document that 2020 is the target year for beginning this new 150 credit certification renewal process. I am in my 32nd year of teaching. I have two undergraduate degrees, one Masters degree, have achieved National Board twice, achieved certification as a Reading Supervisor, and I am lacking one class for my certification as a curriculum director. Nowhere in the document did I see any mention of teachers who have "lifetime" certification. How does this new proposal affect these teachers?

Your time and response is most appreciated. Thank you.

Deborah Blake-Iacchini
Reading Specialist, M.A.Ed., NBCT
Wawaloam School 295-8808

"There can be no keener revelation of a society's soul than the way in which it treats its children and their teachers." --Nelson Mandela



Association of Independent
Colleges & Universities of Rhode Island

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RECEIVED
OCT 18 2018

Monday, October 15, 2018

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

Dear Ms. Teixeira:

This letter is intended to serve as written comments of the Association of Independent Colleges and Universities of Rhode Island ("AICU *Rhode Island*") concerning proposed amendments to the Regulations Governing the Certification of Educators in Rhode Island.

These comments are offered as the collective response from six AICU *Rhode Island* schools – Brown University, Johnson & Wales University, Providence College, Rhode Island School of Design, Roger Williams University and Salve Regina University – which offer teacher education programs. AICU *Rhode Island* appreciates that the Board of Education is seeking to update and improve the teacher certification regulations. Nevertheless, there are several proposed changes to the regulations that concern AICU *Rhode Island* membership. We set forth these concerns below.

I. One-Year Practical Residency

Current Regulations:

Section 6 of the current regulations contain the "General Requirement for Full Certificates." Among these requirements is that "[a]pplicants for teacher certification must complete a minimum of 12 weeks of student teaching and a minimum of 60 hours of field experience prior to student teaching."

Proposed Amendment:

The proposed amended regulations define and later reference a "one-year practical residency." This term is defined at Section 1.2(A)(40):

"'One-year practical residency' means an approach to the clinical preparation of teachers that combines theories of teaching with experiential learning. Teacher residencies are designed to approximate the breadth and depth of preparing to be the primary certified teacher in a classroom. The residency may take place over the course of one-year or may take place over multiple terms as long as a minimum twelve (12) week intensive, full teaching load experience is built in. While general field experience is designed to expose future teachers to a variety of educational settings and children, the One-Year Practical Residency is designed to provide deep instructional practice."

Section 1.6 of the proposed amended regulations states as follows:

"Applicants for teacher certification must complete a one-year practical residency or the **equivalent of a one-year practical residency** and a minimum of sixty (60) additional hours of field experience prior to or following residency."

In addition, Section 1.9 of the proposed amended regulations states as follows:

“Certification in most teaching areas requires: a bachelor’s degree; completion of an approved teacher preparation program that assures completers demonstrate pedagogical competencies of the Rhode Island Professional Teaching Standards and content competencies prescribed by the appropriate professional association; field experience that includes a minimum of one (1) year residency **or equivalent clinical time** for the first certification area and other field requirements for the certification area; a minimum of sixty (60) hours of field experience prior to or following residency student teaching and passing scores on pedagogy and subject matter testing required for the certification area.”

(Bold emphasis added.)

Comments:

The current regulations provide relatively clear guidance concerning the length, timing, and scope of student teaching to institutions that offer teacher education programs.

The proposed amendments complicate the relatively clear student teaching and field experience requirements by adding reference to a one-year practical residency that is vague, ambiguous, and subject to multiple interpretations. For example, the definition states that, “[t]he residency may take place over the course of one-year or may take place over multiple terms as long as a minimum twelve (12) week intensive, full teaching load experience is built in.” The use of the word “may” makes this sentence permissive, rather than required. Will it be interpreted that way? The residency may take place over the course of “one-year” or “multiple terms.” Is “one-year” a calendar year or an academic year? Is the word “term” meant to reflect the academic term of the institution or of the school providing the student teaching experience? The phrase “as long as a minimum twelve (12) week intensive, full teaching load experience is built in” could well be construed to create a significantly greater requirement over the current requirement of “12 weeks of student teaching.” Moreover, AICU Rhode Island’s teaching programs partner with Rhode Island’s public schools in order to provide student teaching opportunities. The proposed language would appear to impose a requirement on the public schools to permit student teachers to carry a “full teaching load,” which is not what the current student teaching experience requires. The Board should clarify the terms that are used within the definition of the one-year practical residency.

Notwithstanding the purported one-year practical residency requirement, the proposed amendments also seem to permit “equivalent clinical time” to satisfy the one-year practical residency requirement. The regulations should provide clear guidance both for the institutions offering teacher programs and for the students seeking teacher certification. This term “equivalent” is ambiguous and open to multiple interpretations. While the intent may be to offer latitude and alternative paths to certification, the use of this term makes it impossible to know what alternatives will be acceptable from those that will not.

As set forth above, the proposed regulations define the “one-year practical residency.” In several locations, however, the regulations refer to a “one-year residency.”



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From the context, we presume that these references are to the one-year practical residency, but we point out these nomenclature issues in the hopes that these will be corrected should the final regulations include this term. See section 1.1 (B) ("All changes go into effect immediately, unless otherwise noted. The **one-year residency requirement** for all teacher certificates will go into effect December 31, 2021 for all entering program candidates."); section 1.7(D)(2)(e)(1) ("The **one-year residency student teaching field requirement** may be waived for an applicant who has had two or more documented years of successful teaching experience in an approved setting."); section 1.9, cited above ("field experience that includes a minimum of **one (1) year residency** or equivalent clinical time for the first certification area and other field requirements for the certification area."); section 1.9.4(B)(2)(d) and (D)(2)(d) ("Has completed a minimum of **one- year residency** in this area and a minimum of sixty (60) hours field experience prior to or following residency.")

II. Cultural Competency

Current Regulations:

The current regulations indicate that Educational Leaders "demonstrate respect for diversity by developing cultural competency skills and equitable practices."

Proposed Amendment:

The proposed amendments appear to include a provision for a shortage certificate called, "Expert Residency Cultural Competence Shortages Certificate." See section 1.8.11(A)(4)(c). The section in question is set forth below:

4. Certification Areas

a. RIDE will identify shortage areas at least every five (5) 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.

b. Requirements for dependent certificates apply to the Expert Residency-Shortages Preliminary Certificate.

c. RIDE will seek approval from the Council on Elementary and Secondary Education prior to the implementation of the Expert Residency Cultural Competence Shortages Certificate.

5. Additional Certificate Requirements

a. For all teacher certificate areas, the applicant must meet subject matter assessment requirements

b. For the area of cultural competence, the applicant must provide evidence that the employing agency conducted a recruitment and hiring process ensuring the applicant's dispositions for success and cultural competence.

c. For School Business Administrator, the applicant must hold a bachelor's degree or advanced degree from an accredited institution in business administration, finance or a related field.

While AICU *Rhode Island* agrees that educators should be sensitive to the impact of culture on student learning, the phrase Cultural Competence is extremely vague, and this proposed language suggests a separate pathway into the classroom for a person who has “cultural competence.” How would such competence be measured?

III. Reciprocity with Massachusetts and Connecticut

Current Regulations:

The current regulations do not contain a specific provision for reciprocity with Connecticut or Massachusetts.

Proposed Amendment:

Section 1.7(C)(2) states that:

Beginning January 1, 2019, applicants from the State of Connecticut or the Commonwealth of Massachusetts who hold full certification in those states are eligible for reciprocity without any additional requirements, with the exception that those seeking certification in Special Education, English as a Second Language, Math Specialist or Reading Specialist must also hold the appropriate independent certificate(s) issued by Rhode Island, the State of Connecticut or the Commonwealth of Massachusetts.

Comments:

AICU *Rhode Island* membership does not support offering automatic eligibility to applicants from any other state unless those states offer reciprocity for holders of Rhode Island teacher certificates. As drafted, this is not reciprocity, but rather, it reflects a one-way benefit to applicants who are certified by these two, neighboring states.

Thank you for the opportunity to provide written comments. AICU Rhode Island and its member schools welcome any opportunity to work with the Board of Education to further define and clarify those sections of the proposed amendments highlighted above.

Sincerely,



Daniel P. Egan
President | AICU *Rhode Island*

**GREATER
PROVIDENCE
CHAMBER OF
COMMERCE**

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October 11, 2018

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

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

Dear Ms. Teixeira:

On behalf of the Greater Providence Chamber of Commerce, I would like to thank you and your staff for soliciting comments on the Proposed Amendment to Regulations Governing the Certification of Educators in Rhode Island ("Proposed Regulations"). We have reviewed the Proposed Amendment and have identified provisions of interest to the business community.

Preliminary Certificates

Section 1.8.5 of the Proposed Regulations allows for the Department to grant Expert Residency-Shortages Preliminary Certificates, which is a preliminary certificate awarded to prospective educators who demonstrate sufficient proficiency in the related subject matter. Today fewer than 25% of most traditional educator preparatory programs are graduating individuals certified to teach secondary math and science. This has left the state with significant teacher shortages in these areas causing children, in some districts, to complete an entire grade level without a full time teacher of record in a secondary STEM class.


Rhode Island teacher shortages in secondary STEM, special education and English as a second language have been identified year over year by the United States Department of Education Teacher Shortage Report. We believe granting expert residency-shortages preliminary certificates would help alleviate these teacher shortages in Rhode Island and would provide Rhode Island students with greater access to educators with STEM proficiency. Finally, it is critical to the Rhode Island business climate to have a workforce with STEM education to fuel Rhode Island's growing knowledge economy.

Teacher Certificate Areas

Section 1.9 of the Proposed Regulations requires educators to complete a one year residency, which is an increase over the previous requirement for 12 weeks of student teaching. Rhode Island believes in elevating the teaching profession through rigorous professional development before and during an educator's tenure. Through meaningful continued development teachers will best be able to meet the unique needs of today's learners and close achievement gaps which exacerbate year over year. Teachers who experience a full year of residency will have a more robust skill set before earning their initial teaching certificate, which will result in a more educated and prepared workforce.

If you have any questions regarding the comments contained herein or if I can be of further assistance, please do not hesitate to contact me at any time. Thank you for considering the Greater Providence Chamber of Commerce's input on this important issue.

Very truly yours,



Laurie White

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

Page Number and Section	Modification Summary	Reason for Modification	Notes
P.1: 1.1 Purpose, Scope, Authority	Add effective dates	There are varying effective dates in the regulations	
P.6: Definitions	Add definition for One-Year Residency	Provide clarity and distinction from other field experiences	RIDE would continue to collaborate with preparation programs to develop implementation details as we have done with the 12 week student teaching
P.6: Definitions	Add definition for Registered School Nurse	This is a new certificate area	The School Nurse Teacher Certificate has been in place for years but a definition was needed for the new one
P. 41: Section 1.4 #4 Requirements for Certification	Included regulatory language from another document regarding principal contracts	RIDE discovered a regulation regarding principal contracts as a separate document and combined it here	This requirement existed previously in a separate regulation.
P.42: Section 1.4 #5 Requirements for Certification	Added clarifying detail for reporting educator misconduct	RIDE needs to be apprised of misconduct that may necessitate investigation	Currently, RIDE may learn of a potential situation through informal channels. To ensure fair treatment for all, a more formal reporting structure is needed
P.46: Section 1.6 C Field Experience Requirements	Added language to the residency expectation- "or equivalent"	Provide flexibility around defining and implementing residency	By adding the "or equivalent" language RIDE can support innovative practices with preparation programs while maintaining high expectations for clinical-based practice. The language change is repeated throughout the document
P. 49: Initial Routes to Full Certification	Added effective date	RIDE is staggering effective dates to ensure development time prior to implementation	
P.50: Initial Routes to Full Certification E	Clarified credential review language	Implementation has been confusing	

P.53: Initial Educator Certificate; P. 55 Professional; P.59 Advanced	Deleted evaluation language	RIDE is proposing a removal of the link between evaluation and certification	This language is repeated for Initial, Professional and Advanced certification. Language was also removed from the Temporary Initial certificate
P.62: Section 1.8.5 Professional Learning Units	Added language requiring an LEA professional development plan	RIDE is proposing a requirement for LEAs to develop professional development plans in support of strong professional learning systems	The development of a professional development plan will assist LEAs in meeting the varying needs of educators across a variety of roles
P.69: Section 1.8.8 CTE	Added effective date and clarified duration of certification; added language requiring induction for all Preliminary certified CTE teachers	RIDE needs time to adjust existing platforms. The duration was left out during 2016 adjustments	
P.76, 77 Section 1.8.11-Expert Residency Shortages	Added effective date; added additional Council approval for shortage areas and implementation	Needed to clarify when this certificate could be first implemented. RIDE wanted to provide Council an opportunity to review and approve shortage areas and specific implementation dates for a Cultural Competence shortage	
P.79 Section 1.8.13 Endorsement	Added effective date; added additional approval language	RIDE wants to provide the Council with the opportunity to review and approve endorsement areas as they are introduced	
P. 81: Section 1.9 Teacher Certificate Areas	Added effective date for teaching time in other areas	Part of planning implementation. The date reflects the beginning of the school year following adoption of the regulations	

P. 83: Section 1.9 C #3 Bilingual/Dual Language	Added language clarifying language expectations and English to Speakers of Other Languages (ESOL) cross-over pathways; added effective date; added Council review for ongoing approval on a five year basis	With the right supports and background, RIDE is proposing that individuals would have a clear pathway to also add ESOL certification	RIDE met with a focus group of ELL educators and prep programs to discuss ESOL and bilingual/dual language programs. We are confident this language and the later ESOL language addresses the discussion and provides for ongoing review. This change is repeated at each grade level (early childhood, elementary, secondary etc.)
P.83: Section 1.9 D #1 English to Speakers of Other Languages	Added clarifying language for cross-over with bilingual/dual language; added effective date	ESOL teachers have the language preparation needed to support English instruction in a dual language program. Professional learning may be needed as part of renewal	RIDE met with a focus group of English language learner educators and prep programs to discuss ESOL and bilingual/dual language programs. We are confident this language and the later ESOL language addresses the discussion and provides for ongoing review. This change is repeated at each grade level (early childhood, elementary, secondary etc.)
P.115 Section 1.9.5 J	Title modifications to the 2 school nurse certificates	The original proposed titles were confusing	
P. 132 Section 1.16 Complaints	Deleted complaint language	Our long-standing complaint process will be posted as a procedure rather than a regulation	