

gm

Stephanie Egan  
1607 Middle Rd.  
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Rhode Island Department of Education  
Angela Teixeira  
Special Assistant to the Commissioner of Elementary and Secondary Education  
Liaison to the Board of Education  
255 Westminster St.  
Providence, RI 02903

October 11, 2018

Dear Ms. Teixeira:

I am an Auditory-Oral Educator of the Deaf and Hard of Hearing. I have been an educator in this unique field for twenty-two years. I am writing to request that the requirements to become a certified Teacher of the Deaf and Hard of Hearing in Rhode Island be revised to include a second certification for teachers who do not use American Sign Language. I am deeply concerned that the regulations do not encompass all educators of children with hearing loss. It is important to be aware that not all Teachers of the Deaf and Hard of Hearing use American Sign Language to teach students with hearing loss. The certification requirements fail to take into account the various communication modes used to teach students with hearing loss throughout Rhode Island and the United States.

There are diverse teacher training programs for Deaf Education. Each training program focuses on a specific communication approach, or mode, to educate students who have hearing loss. Some programs train teachers to use the Bilingual/Bicultural approach, which uses American Sign Language to teach students in the classroom. English is taught by exposure to the printed word. The Total Communication approach combines visual and auditory communication. Various sign systems may be used (Signed Exact English, American Sign Language, Cued Speech, etc.) simultaneously with speech to learn English and communicate. Finally, the Auditory-Oral approach combines aided or implanted residual hearing and speechreading to develop auditory skills and spoken language. These different approaches to educating students with hearing loss provide families and students options for various modes of communication based on individual abilities, preferences, strengths and needs, and family choice.

I do not advocate for one communication mode versus another for students who are Deaf or Hard of Hearing. My guiding philosophy is that all Rhode Island families must be provided with equal access to all communication modes for their children with hearing loss from birth through 21 years of age. To provide equal communication mode options for families, Rhode Island must provide access to certified educators trained in specific communication approaches. I implore RIDE to follow what other states currently offer in providing certification options for Educators of the Deaf and Hard of Hearing – ASL and Auditory-Oral. To certify only one communication mode for Deaf Education, is to deny access and options to the others.

I welcome discussion about this critical issue. I am hopeful that we can work together to revise the certification to include all communication modes for educating children with hearing loss. Rhode Island is responsible for providing the highest standards of current best practice in Deaf Education.

Thank you for your consideration regarding this critical matter. I look forward to communicating with you in the near future. I may be contacted at my home – 946.6991, office – 734.3050, home email – [Stephegan7@gmail.com](mailto:Stephegan7@gmail.com), or my work email – [Stephanie.egan@warwickshools.org](mailto:Stephanie.egan@warwickshools.org).

Regards,



Stephanie Egan, M.S.Ed.  
Educator of the Deaf and Hard of Hearing



10/9/18

~~OTHER~~ MEMBERS FROM RIDE

Good evening ~~Commissioner Wagner~~ and Members of the School Board. My name is Stephen Blessington and I have been a Mathematics teacher for the past 23 years, nationally board certified for the past 15 years, I stand in opposition to the RIDE requirements. Teacher compensation (wages plus benefits) has been steadily declining since the 90's. According to the Economic Policy Institute, since 1994 our wages and benefits are 11.1 percent lower than that of comparable workers in 2015. When I was informed of the changes to educator certification regulations, I was angered because my district, the Cranston Public School District, already pays for and requires me to attend professional development opportunities for FREE! They actually pay me for some of my professional learning hours! Having to get 30 PLU's per year for five years seems way too much!! Too much time away from preparing great lessons.... Too much time away from my family.....too much of a hit on my salary that is already too low!!!! Where did we find this 150 PLU number or 30 PLU's per year? Is this an arbitrary number or IS this the number that will help balance the states books on the the fleecing of teachers?!

If an applicant does not complete the required PLU's, the certificate will not be renewed???? We have a hard enough time recruiting and retaining teachers as it is nevermind extra hoops to jump through! In my district, I have learned about Google Classroom, Google Drive, Blended Learning, Google Docs, Google Sheets, Google Forms, Kahoots, Quizzizz, IXL, STAR, Doceri, and many others all at NO COST to me!

I already use my personal IPAD, personal printer, and personal computer so my students can be successful in my class!

Teachers are sick and tired of getting hit in the pocket! Every time I feel as though "Hey I might make a little extra this year and build up some savings!" It always seems to be negated by "health care increases or other factors"! Now in 2020, my pay will be adversely affected by these unnecessary RIDE regulations in the form of PLU's!

I cannot afford to go and take classes, been there done that! Does that mean I will not continually strive to get better? No it does not! As an educator, I am always trying new things and learning new things on my own because that's what good educators do!! Educators are always learning the newest strategies and it should not affect our salaries to do that!

Thank you!

TEACH  
PREP

PATHWAYS  
FOR  
SHORTAGES

PROFESSIONAL  
LEARNING  
~~FOR~~ FOR  
TEACHERS

- ENDORSEMENTS
- NOT HAVING ONE  
SIZE FITS ALL.
- ANCHORED IN  
TEACHERS HELPING  
TEACHERS



Good evening,

My name is Kristen Rhodes Beland. I am a fourth grade teacher at Suzanne M. Hensler Quidnessett Elementary School in North Kingstown Public Schools.

I have come here tonight to speak in support of the proposed regulations.

I support the proposed changes in the RI teacher preparation regulations because of my own experience as an early career teacher.

I graduated with an interdisciplinary degree from Salve Regina University. This degree, combined with a multitude of experience working with school age children, is why I was hired by the North Kingstown school district 17 years ago even though I was probably the least likely candidate.

Unlike the other candidates, I did not have my certification in elementary education. What I did have was a skill set needed for the position which my former principal was looking to fill. I was enthusiastic, eager, filled with knowledge of the arts, and how to teach cross curricular content. Being chosen for the position was a tremendous honor and once I had it, was willing to fight for it. I had the joy of being one of 6 Integration Specialists trained through the Brown University SMART program. During this time I not only obtained my teacher certification, but received extensive mentoring from trained educators.

Salve Regina was an incredible school and I will always be grateful to them for the education I received, but nothing could have ever prepared me for the work in the classroom with my students except to be with them in the classroom.

Teaching is about more than studying education philosophy and pedagogy; it is about understanding the social/emotional needs of our students in our current society. The opportunity to participate in a teaching practicum for one year under strong leadership will foster more effective and ready educators for our students.

I believe that opening the doors to those who are excited to teach, regardless of certification, holds nothing less than positive results for our kids. Our students need the very best to be the very best. Change is needed in our teacher preparation programs and I believe the proposed changes before you will welcome, and create, a new generation of extraordinary educators. Thank you.

Sincerely,

Kristen Rhodes Beland,  
Teach Plus Rhode Island Fellow  
Kristen\_Beland@nksd.net



Good evening,

My name is Sarah Rosendale and I have been working as an Auditory-Oral Teacher of the Deaf for more than 16 years. For the last 13 years, I have taught in the RI Auditory Oral Program, which was founded in 2005, in large part by the Rhode Island Department of Education as a way to address the educational needs of a very specialized population of students. As an Auditory-Oral Teacher of the Deaf, I work with students who are using listening and spoken language rather than a form of manual communication - such as American Sign Language - as their primary mode of communication. The students I work with on a daily basis have no knowledge at all of ASL. With the advances in medical hearing technology such as improved hearing aids and cochlear implants, large numbers of children with hearing loss are never even exposed to ASL. My colleagues and I currently work with roughly 75 children, from birth through high school, who exclusively are learning how to listen and speak, and who do not use ASL. Additionally, other educational professionals across the state work with children with similar profiles; children who are not using ASL.

As written, one of the requirements for certification for a Teacher of the Deaf and Hard of Hearing is that one must demonstrate competency in American Sign Language. Yet students that many of us work with know no sign language. Teacher training programs for Education of the Deaf and Hard of Hearing vary based on modality. For example, I received my Master's Degree in Deaf Education from Smith College. My training, coursework and practicum exclusively pertained to Auditory-Oral (or Listening and Speaking) practices. There was no training in the pedagogy of educating children who use ASL. By the same token, an individual graduating from Boston University with a Master's Degree in Deaf Education will be trained from the Bilingual/Bicultural approach (that is, ASL as the primary language, English as a second language through reading and writing) and not Auditory-Oral practices. As such, requiring all applicants for the





Teacher of the Deaf and Hard of Hearing certification <sup>not only</sup> for to demonstrate competency in ASL implies that all children who are deaf or hard of hearing use sign language, but also excludes many qualified candidates who do not have a background in ASL. ~~Other states, such as MA, offer certs in Auditory~~ <sup>and T</sup> ~~Oral~~

An additional requirement is certification in Early Childhood Education, Elementary Education, Middle Grades Education, Secondary Grades Education or All Grades Teacher. Again, many teacher training programs for Education of the Deaf and Hard of Hearing provide instruction exclusively for Deaf Education and do not <sup>set aside</sup> intend to prepare the degree candidate for certification in general/regular education. Here again, this requirement excludes many qualified candidates who completed their degree at an accredited institution in which a Deaf Education degree is conferred (rather than an Education degree with a certificate in deaf studies as is the case in some programs). No higher education institutions in Rhode Island offer Teacher training in Deaf Education, meaning that 100% of the candidates for this certification are coming to us from out of state. Unfortunately, many are or will be turned away before they can even get their foot in the door as they will not meet some of the requirements for certification.

I ask that you reconsider the requirements for Teacher of the Deaf Certification as written, ~~given the variety of~~ ~~unique needs~~

Thank you.





Sam

## School Nursing Certification in RI

October 11, 2018

In reference to: All Grades Registered School Nurse, Grades PK-12 (p. 104) <sup>115</sup>

It is important to reconsider the path to RIDE educator certification for school nurses. However, the proposed split path, with one track that discards requirements for specialized training and competencies for the role of the school nurse, is detrimental to student health, learning, and equity.

**Student health is a precondition to student learning. The two are inseparable.  
Students need well-prepared school nurses who can address both.**

*Equity Gap Exploration and Analysis- Ensuring Equitable Access to Excellent Educators – Rhode Island's Plan (2015):* “Highest poverty and highest minority schools are more likely to have inexperienced teachers, **support professionals**, and leaders than lowest poverty and lowest minority schools” (p. 2).

KEY FINDINGS: “Central to ensuring equitable education and outcomes is ensuring equitable access to excellent teachers **and support professionals** supported by excellent leaders” (p. 5). “This approach must address all aspects of talent management: preparation, **certification**, recruitment and hiring, mentoring and induction, professional learning . . . and compensation” (p.7).

[http://www.ride.ri.gov/Portals/0/Uploads/Documents/Teachers-and-Administrators-Excellent-Educators/Equitable-Access/APPROVED\\_EQUITY\\_PLAN\\_RI\\_2015.pdf](http://www.ride.ri.gov/Portals/0/Uploads/Documents/Teachers-and-Administrators-Excellent-Educators/Equitable-Access/APPROVED_EQUITY_PLAN_RI_2015.pdf)

Every Student Succeeds Act (ESSA) ‘**specialized instructional support personnel**’ (SISP) are essential to removing barriers to educational success by supporting student physical and mental wellness to help all students achieve academically.

U.S. Department of Education (2016)

- SISP are included in the list of educators in the definition of “professional development” ESSA, sec. 8002(42).
- Chronic absenteeism (a major problem in RI, also related to graduation rates) has a profoundly negative effect on student achievement and is directly tied to ongoing and/or unmet health care needs. School nurses have a direct impact on student attendance as well as other aspects of student health that impact learning (e.g. vision screening, which impacts the ability to read)

School nursing is a professional specialty that requires unique PREPARATION and ongoing professional development to promote student achievement in the educational setting. Addressing the health and educational needs of children takes specialized nursing skill including expertise to address barriers to learning, enable academic achievement, conduct standardized screenings, and





to apply educational initiatives such as IDEA, IEP, IHCP, ECP, 504, FERPA, ADA, ELL, SEL, and McKinney-Vento.

This uninformed proposal to create a split path to school nurse RIDE educator certification is **diametrically opposed to tenets of the RI State Equity Plan, ESSA, and the US Dept. of Ed.**

If enacted, the split plan will have financial, human and societal costs that will very likely:

- Negatively impact student health
- Negatively impact student academic achievement
- If pay scales for nurses go down, this will likely create a shortage (where none currently exists) of nurses willing to work in schools
- INCREASE structural inequity and disparities into the state system in the quality of school nursing services between communities

### **Recommendation**

1. Postpone the decision on RIDE school nurse certification
2. Form a work group, comprised of an informed set of key stakeholders that includes school nurse leaders, to conduct a thorough study on the matter so that we can:
3. Create a stronger, well-designed path to school nurse RIDE educator certification as **Specialized Professional Support Personnel** that is aligned with the RI's Equity Plan ESSA, and US Dept of Ed. that values and prioritizes:
  - protecting student health
  - investing in student academic success
  - preventing a shortage of qualified school nurses (where none currently exists)
  - closing inequity gaps, rather than widening them

**Student health is a precondition to student learning. The two are inseparable.  
Students need well-prepared school nurses who can address both.**

Respectfully submitted,

Wendy Doremus, RN, MS, NP-BC, PHNA-BC, DNP(c)  
Coordinator, RI Collaborative for Interprofessional Education and Practice  
Doctoral nursing student at RI College

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SM

Sandra J. Delack, M Ed, BSN, RN, RICSNT, NCSN, FNASN  
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October 11, 2018

Dear Commissioner Wagner and Council Members,

As a lifetime proponent for rigorous certification standards, I am deeply disappointed in the current proposed changes to the educator certification regulations. I am certified both by RI Department of Education and the National Board for Certification of School Nurses (NBCSN). I voluntarily chose to achieve and maintain the latter, at my own expense, because I believe the complex role of the school nurse requires each of us to perform at the highest level in our specialty area.

Certification is recognized as validation of knowledge in a specialty area. A bachelor's degree and a nursing license prepared me to begin my practice as an RN, but not to work in the specialty role of school nursing. After 12 years' experience as a staff nurse, charge nurse, and nursing supervisor, I obtained my initial provisional CSNT certification and stepped into my new role in public schools. It was an eye-opener! Very little of my experience prepared me to effectively navigate population health (screenings, immunizations, disease outbreaks, mass clinics), mental health, or understand the world of special education. The coursework required for RI CSNT certification provided me with the working knowledge to take on this role.

The Scope and Standards for School Nursing, jointly written by the American Nurses Association and the National Association of School Nurses states: *Because of the broad scope of practice and the complexity of issues addressed by the school nurse, NASN recommends the minimal educational preparation for a school nurse to be a BSN from an accredited college or university, as well as state certification in those states requiring or recommending states school nurses licensure/certification School nurses must seek professional development and CE to increase critical thinking skills and professional judgment, as well as to maintain competence in their role. NASN also recommends that school nurses demonstrate knowledge of school nursing by acquiring certification in the nursing specialty of school nursing at the national level.*

Nursing specialties such as school nursing require complex knowledge and skills. The additional coursework and skills training provided throughout the certification program prepares nurses to learn and speak the language needed to be effective as sole healthcare providers in the educational setting. Certification as a CSNT allows school nurses to teach formally in the classroom, but its value is much greater; it provides RN's who have worked in other settings with the knowledge and skills to competently serve in this specialized role. Elimination of the educational requirement for certification of school nurse-teachers in RI lowers the standard of care and is a disservice to our students and communities.

Sincerely,



Sandra J. Delack







Linn Alvarnas M.Ed, BSN, RN, NCSN  
Coordinator of Nursing Services  
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After the last public hearing I attended at PMS it was clear to me that the Department of Education does not have a clear understanding of the role of the school nurse. In an effort to illustrate our role I gathered data from the last week.

I work in an elementary school with 380 students. It's relatively small. We do house the elementary special needs and behavior disordered population in our building.

From 10/3 – today I have had 145 visits to my office  
I have had 6 meetings in preparation for one 504 meeting which involves considerable coordination with the students physicians, OT, PT, speech and the student's parents  
I did 2 one hour observations  
I taught 6 health classes for 45 min

Kinder the lesson was Getting Sick a disease prevention lesson  
Grade 1 the lesson is Head to Toe understanding the body parts and what they do  
Grade 2 the lesson was Babies and How You Grow where students explore the human lifespan and how healthy choices have lifelong impact  
Grade 3 the lesson is Finding out about Bones the lesson includes bone health, and posture  
Grade 4 has a Body Systems lesson where students begin to make the transition from talking about individual body parts to how organs work together to make systems  
Grade 4 had a Disease Prevention lesson where we did an experiment using bread

Patterns of behavior are best established early in life. Health education is important in the elementary grades because it incorporates the idea of healthy choices and empowers students to make good choices beginning early

Mental health teaching is crucial because student can be taught coping strategies to deal with stress and anxiety. I use meditation videos to reduce anxiety and teach relaxation in each grade using yoga and controlled breathing techniques.

In a recent survey students reported they are more likely to go to the school nurse when they are having mental health issues than any other adult at school.

If the certification of School Nurses is changed, RI will be taking a step backward. Schools will be compromising the expertise of highly trained professionals with certification specific to the unique practice of school nursing and undermining the statewide strategic planning model that strives to increase excellence in schools

Students must be healthy to be educated and educated to healthy and no one does that better than Certified School Nurse Teachers





# Rhode Island Certified School Nurse Teachers Association

[ricsnta.nursingnetwork.org](http://ricsnta.nursingnetwork.org)

October 11, 2018

Dear Commissioner and Committee Members,

As a member of Rhode Island Certified School Nurse Teachers Association, I am concerned that the proposed new pathway to certification will not adequately prepare prospective school nurses for the challenging and complex role of a school nurse. Creating a dual pathway to certification will also create a disparity of service to the children cared for by nurses with reduced educational preparation.

Although prior to school nursing my experience included over 20 years at Hasbro Children's Hospital, that valuable experience still did not sufficiently prepare me for the specialty of school nursing. The following is a partial list of the tasks and responsibilities school nurses encounter daily which require additional education:

- Immunization compliance for prevention of disease outbreak. (RI #1 in the country for compliance)
- Health screening: (vision, hearing, scoliosis, dental) for early detection and referral.
- Educational planning and team membership for: IEPs, 504s, Individual Health Care Plans.
- Emotional assessment, support and intervention for: suicide, self-harm, anxiety, drug use and trauma.
- Health promotion: planning and implementation for flu/vaccine clinics, dental clinics, nutrition events, activity programs and health fairs.
- Managing chronic illnesses within the school setting allowing students to attend school who need medical intervention/equipment during the school day (ex: insulin pumps, catheters, feeding tubes, etc.).
- Surveillance of infectious diseases and working closely with DOH to mitigate the spread of disease.
- Health teaching in the clinic, classroom and providing staff presentations for: blood borne pathogens and Epi-pen usage among other topics.
- Emergency Preparedness: crisis team member to prepare for: evacuations, school violence/triage, CPR
- Collaboration with DOH, RIDE for school regulation/implementation in school nursing practice.

As a clinical nursing instructor for the BSN pediatric program at URI, I can also attest to the fact that these specialty topics are not addressed in the baccalaureate curriculum. The following courses required for the current certification prepare the school nurse to function as a nurse specialist:

- Epidemiology: disease outbreak
- Role of School Nurse Teacher: screenings, health plans, immunization compliance, complex medical conditions.
- Program Development: planning and implementing health programs- flu clinics, blood drives, health fairs
- Education of Exceptional Child: IEP, 504, IDEA and FERPA





- Legal aspects of school nursing: Legal and regulatory compliance in the school setting (Laws affecting use of: AEDs, Narcan etc.)
- Counseling: support for students with mental health issues
- Sexuality and Family Life: education and teacher collaboration
- Education courses prepare nurses to teach health lessons in and out of their offices and provide in-services to staff

Since the role of the Certified School Nurse Teacher is one of a specialist and solo practitioner, "On the Job Training", as some have suggested is not feasible. The students of RI deserve nurses who have completed a certification program that includes advanced education to ensure that they, their families and staff have nursing services administered by nurses who are highly competent, qualified and educated.

Respectfully,



Linda Twardowski, M. Ed., BSN, RN

Certified School Nurse Teacher

Nurse District Coordinator

150 Fairway Drive

North Kingstown High School

North Kingstown, RI



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

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

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

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

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

Points of concern:

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

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

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





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

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

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

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

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





Nurse Specialists in School Health  
We Care for Rhode Island's Children

May 24, 2018

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

The Rhode Island Certified School Nurse Teacher Association (RICSNTA) has concerns regarding the *Proposed Revisions to the Regulations Governing the Certification of Educators in Rhode Island*, as discussed below. We respectfully request that you give serious consideration to these concerns.

Our major concern is ensuring that RIDE continues to require certification for school nurses. A program of required coursework coupled with a clinical /field experience requirement will provide the nurse with the knowledge and skills necessary to provide services in accordance with RI Rules and Regulations for School Health Programs as well as meet the minimal Scope and Standards of practice as set forth by the American Nurses Association.

School nursing is a specialty within nursing that requires post graduate coursework to advance the registered nurses' knowledge and training to prepare them for administering nursing and health services in the educational setting. To best prepare nurses for the numerous and varied challenges they may encounter in School Nursing, a program of study should minimally include courses in School Nursing, School Health, Health Education, Special Education, and Mental/Emotional Health. Preparation for the school nurse role is gained through the coursework provided in the certification process; eliminating coursework will result in school nurses who are not prepared for the specialty of school nursing.

In addition, school nurses do not have the direct support of nurse colleagues, mentors, or preceptors in their schools. Clinical work/field experience provides an orientation, overview, and hands-on, real-life opportunities for nurses to respond to the demands and challenges of school nursing, preparing them for assuming school nurse roles and responsibilities in their own practice.

It is imperative that school nurses complete a certification program that includes coursework and clinical experience to ensure that students, their families, faculty and staff have nursing and health services administered by nurses who are highly trained, highly qualified, and highly competent.

Thank you in advance for your thoughtful consideration of these concerns.

Sincerely,

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



## RIDE Public Hearing on Educator Certification Regulations

October 11, 2018

Kathleen Torregrossa, Ed.D.

Cranston Public Schools

Coordinator of Educator Evaluation, Professional Learning, & Mentor Programs

Good evening. Although I commend some of the language changes you are proposing to the certification regulations, I also have many concerns.

1. In the initial discussions, you indicated that Professional Learning requirements were going to replace the educator evaluation requirements in order to achieve re-certification, however there is still language in here that disqualifies individuals if they have an ineffective rating and it is not clear if that is once during the 5 years or every year. This continues to be an inequitable qualifier as traditional public school teachers are held to a higher standard than charter/private schools who have evaluation systems that are not as intense, yet they will be awarded the same certification I hold.
2. The comparison has been made that the 30 hour requirement is the same as when we had the I-Plan. That is not accurate. Yes the number is the same, but we were not asked to do chunks of sustained PL for 10 hours on 1 topic. Additionally, many more things counted for I-Plan (committee work, School Improvement Teams, curriculum development work, etc.).
3. The 30 hour requirement is problematic for other reasons:
  - a. This mandate is not equitable across our districts, some have significant PL supports in place for their teachers and other districts have minimal supports.
  - b. The financial burden on districts, not only to provide Professional Learning opportunities, but to manage the record keeping for all of this. Yes, the teacher can keep track of all they do, but your regulations state that the Superintendent must approve that the PL meets the district initiatives and sign off on that. In a district like



Cranston, with 1000 teachers, this is a huge time commitment and I believe my Superintendent has other issues to deal with.

- c. Access to high quality PL through a RIDE network, is a fabulous idea but it is a work in progress. How will you vet presenters and content? This, in and of itself, is a huge undertaking that should be in place before these regulations go into effect so it is running efficiently before the stakes are high - impacting teacher certification.
  - i. As the RIDE PL supports are built, could we phase in the amount of PD from 5 to 10 hours per year until RIDE has a network that offers enough PL for all teachers and then build. I believe, and research supports, that high quality sustained PL in one area, that is job embedded, is the most powerful PL. We should be doing less but higher quality - otherwise folks will be participating in PL that is convenient and putting in the seat time, rather than choosing what is meaningful and relates to supporting the students in front of them each year.

*Kathleen Songosso*  
*Speaking on behalf of 1000 Cranston teachers!*

Nancy Cloud

SM

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

**RE: Proposed Revisions to the Regulations Governing the  
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(Modifications to Red-line Certification Regulations Since April 24, 2018)

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

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

Points of concern:

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

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

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

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

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

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

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

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