

**Teixeira, Angela**

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**From:** lornalyons57 <lornalyons57@gmail.com>  
**Sent:** Sunday, October 14, 2018 8:00 PM  
**To:** Teixeira, Angela  
**Subject:** Proposed Revisions for Teacher Certifications

Dear Angela,

The proposed revisions for teacher certification are totally unfair to teachers. During the 2008 - 9 banking crisis it became evident of the financial strain these proposes put upon teachers. Many other municipalities whom are given professional training, are not at the cost of the trainee but at the cost of the employer. The city of Warwick should secure monies for future training guaranteed in their budgets.

Thank you, Lorna Lyons  
Warwick Public Schools

Sent via the Samsung Galaxy S9, an AT&T 4G LTE smartphone

## Teixeira, Angela

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**From:** Foehr, Lisa  
**Sent:** Sunday, October 14, 2018 8:10 PM  
**To:** Teixeira, Angela; Keenan, Mary  
**Subject:** FW: New RIDE regulations- PUBLIC COMMENT

[More comment...](#)

*Lisa M. Foehr* | Chief, Division of Teaching & Learning  
255 Westminster St., Providence, RI 02903 | tel 401-222-8809 | [www.ride.ri.gov](http://www.ride.ri.gov)

**From:** Fitzgerald, Michael [mailto:Michael.Fitzgerald@ppsd.org]  
**Sent:** Saturday, October 13, 2018 5:59 PM  
**To:** Foehr, Lisa <Lisa.Foehr@ride.ri.gov>  
**Subject:** Fw: New RIDE regulations- PUBLIC COMMENT

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**From:** Fitzgerald, Michael  
**Sent:** Thursday, October 11, 2018 8:03 AM  
**To:** [Lisa.foehr@ride.ri.net](mailto:Lisa.foehr@ride.ri.net)  
**Subject:** New RIDE regulations- PUBLIC COMMENT

To: Lisa Foehr,

I am writing with regards to the proposed changes to teacher certification. I am in my 21st year as a Rhode Island educator. I hold a professional certificate and a content ESL endorsement. I have attended hundreds of hours of professional development over my career. I hold a 4.0 in all of my graduate level classes. Under No Child Left Behind, I was highly qualified enough for 3 teachers due to the many pedagogy methods classes required of my degree. I have received nothing less than highly effective ratings for each of my evaluations. I consider myself a master teacher and have written Scope And Sequence and Music K-12 curriculums for the Providence School Department. I also wrote and designed the Music CTE curriculum for Hope High School. I have been a member and chair of the Hope High School SIT and I am a current member of the ILT and PLC. I offer and organize after school lessons and I run an after school jazz band program which performs roughly a dozen times a year all over the state. Needless to say, my plate is full!!

I was concerned with language used in the recent proposal that has been opened for public comment. Teachers in the State of Rhode Island should not be expected to essentially take a pay cut based on additional hours invested and the possibility of financial repercussions. There is data that suggests that there is very little correlation between teacher pd/ advanced degree and increased student achievement (Calder Urban Institute National Center For Analysis Of Longitudinal Data In Education Research. " Teacher Training, Teacher Quality and Student Achievement." Harris and Sass. 2008). There is specific data that suggests that when teachers are investing hours in "meeting hours/ credits" of requirements, student teacher accessibilities suffer. In my current position, additional anything means that I have to sacrifice something I am already invested in which

are all "student centered". The language suggests that teachers are "financially responsible" for credits not covered and also mentions sustainable credits. This proposes many questions.

Are teacher expected to take classes? Most of the 16,000 teachers do not have \$1000 and up for college courses. If every teacher took 1 course over 5 years, these regulations would extract 16 million dollars out of the salaries of Rhode Island teachers, just 1 course each. Are LEA's going to design enough sustainable credits so teachers have the option of not paying for college courses? I personally can not afford it. Is it possible for LEA's to design sustainable pd offered through common planing time? I feel working it into the teachers schedule of common planing time will direct districts and schools to design meaningful pd that meet the needs of our districts/ schools, will not take away from teachers accessibility to students, will not financially burden teachers, allows teachers to receive enough credits in their school day, will not financially burden districts.... This would also increase teacher attendance on days pd is built into the schedule.

I feel there are still many unanswered questions. Based on the year 5 (2016-2017) RIDE findings, year 6 is not available, 95% of teachers earned an effective teacher rating. 57% of which are highly effective. Why are highly effective teachers responsible for the same credits as effective, developing, and ineffective? Why is experience not also a factor? If 95% of teachers are effective , why are we adding this to overworked, over qualified, under paid teachers. Not to mention that we work in some of the most deplorable almost criminal conditions ( even prisons are clean, mold free, air conditioned and have proper heat!!!) I am a teacher and I love to learn, but I feel that RIDE needs to table adoption of this proposal so teachers can have input and assist RIDE in getting this right. We have a great opportunity to work together to create a system that will work, this as is will not. We owe it to the students of Rhode Island to design a system that will benefit all the stakeholders most importantly teachers and ultimately students. LISTEN TO US. We are the ones that are on the front line. Given that this was put out during the summer, most teachers I have spoken to feel a bit blindsided by this and did not know about the proposal. If this just passes through without teachers comments helping to re shape it, why have a public comment at all? Top down management, low wages, disrespect, horrible working conditions and the many hoops to jump through. No wonder there is a shortage of teachers. Please do not make things worse!!

Sincerely,  
Michael Fitzgerald  
Music Director  
CTE Music Instructor  
Hope High School

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## Teixeira, Angela

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**From:** Erin Welchman <erin.welchman@bwrsd.org>  
**Sent:** Friday, October 12, 2018 11:48 AM  
**To:** Teixeira, Angela; Foehr, Lisa; Wagner, Ken; DiOrio, Vilma; Sienko, David  
**Subject:** Proposed changes for the certification process specifically for school nurses

I emailing out of concern and would like to know Dr. Nicole Alexander-Scott's position on the proposed changes that will impact the implementation of the Rules and Regulations for School Health Programs (RI 16-21-SCHO).

I am greatly concerned for RI student's health and wellness.  
The proposed changes to the certification process for school nurses have me very worried.

The Department of Education states there is a short of RI certified school nurse teachers but when a RICSNT collected the data from all school districts in RI it was discovered there are only 3 unfilled positions in Providence. That data does not suggest a shortage. The Department of Education has proposed 2 tracks for school nurses. 1. Certified School Nurse-Teacher with the same requirements in the past with the addition of a one year practicum or the equivalent; 2. Certified School Nurse with no teaching duties. However, there is a huge discrepancy between 1 and 2. The second tracks only requirements are: Bachelors degree (doesn't specify BSN) could be a bachelor's degree in anything; have completed a Nursing program; has 3 years of Nursing experience (doesn't specify in what area) and have a RN license. The above requirements would then make an applicant a "Certified School" Nurse, and they may have no experience related to that specialty. The above requirements for the second track are no different than the current requirements for an "Emergency Certification" for a school district that has not had any qualified candidates apply. The second track is giving a Nurse the title of "Certified School" Nurse for simple providing their credentials and writing a check. With the above requirements we potentially could have an applicant with a bachelors in Art, have gone to a community college and obtained an associates degree in Nursing, has a RN license and worked 3 years in a nursing home home. In addition, associate RN programs do not offer community health nursing education in their programs making the above scenario even more concerning. We would have "Certified School" Nurses in our buildings lacking the expertise to care for our children.

As a RN, BSN, I lacked the experience to be a Certified School Nurse when I first started out in 2000. However, I was passionate about working in the schools after subbing at the local elementary school. I went to RIC and began working on my certification requirements to become a RICSNT. The classes I took were very valuable and taught me about the social aspects and history of education, school nurse screenings, immunizations, rules and regulations for school health programs, 504 plans, IEPs, Individualized health Care Plans with special accommodation and modifications needed for the school setting, special education and diversified instruction, epidemiology, behavior change, types of health curriculum, web searches and reliable sources of information on the internet, assessment, research, data collection and so much more. The above content areas/coursework was not covered in my BSN program and was very specific to school nursing and understanding schools, teachers, children and families. I chose to continue my education after passing the Praxis and obtain a master's degree in health education. When I began working I was very fortunate to have been hired into a district where I was the second school nurse teacher. I was teaching health in the classroom and working in the nurse's office alongside of a RICSNT. I was fortunate enough to have done this for 3 years. In 2005 my hours were cut due to decreased student census and decreased health needs and acuity of students. I began searching in other school districts for a full time position. I was hired in another district to work as a full time RICSNT and was feeling like I was ready to take the lead of my own school having had the education and the experience.

RICSNTs are required to follow the Rules and Regulations for School Health Programs written by the RI Department of Education and Department of Health.



I am concerned that cities and towns will be looking to save money and hire RNs who may not be qualified to administer the Rules and Regulations. Violations in the administration of the Rules and Regulations for School Health Programs will put cities and towns in jeopardy of having public money withheld by the state. But more importantly, I am sure you agree the health and safety of RI children needs be paramount. In addition, I believed the perceived shortage is not RICSNTs. There is a shortage of substitute school nurses. You can not compare a sub teacher and a sub school nurse. The sub teacher is responsible for teaching the students sitting in the seats in front of them during that period. A sub school nurse-teacher not only has a teaching certificate but a license. RNs need to protect their license and not put themselves in risky situations with increased liability especially in this day and age. RNs are not going to cover a school of hundreds or even thousands of students and teachers and put their license in jeopardy for a population they do not know or barely know and risk making a medical mistake. School districts are unwilling to pay for sub nurses to come in and train and shadow school nurses in the event they are needed. Sub nurses are not trained to access the electronic health record making it even more difficult for them to know and understand the population they are serving on that given day.

Please help us find some middle ground between Certified School Nurse-Teacher and Certified School Nurse. There is way too much of a discrepancy between the two titles making it difficult to consider option 2 a "Certified School" Nurse.

The RICSNTs look forward to you consulting with them and working with them to do what is right. Look forward to your response to the public concerns on and off the record.

Sincerely,

Erin Welchman M.Ed, BSN, RN, RICSNT

**Erin Welchman M.Ed, BSN, RN, RICSNT**

Kickemuit Middle School

525 Child Street

Warren, RI 02885

Tel. 401-245-2010 Ext 2009

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email: [erin.welchman@bwrsd.org](mailto:erin.welchman@bwrsd.org)

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**Teixeira, Angela**

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**From:** Woulfe, Erin <ewoulfe@egsd.net>  
**Sent:** Monday, October 15, 2018 11:29 AM  
**To:** Teixeira, Angela  
**Subject:** Public Comment Regarding the Certification of Educators in the state of Rhode Island  
**Attachments:** Response to RIDE Certification Regulations.pdf

The attached file is submitted as public comment on the changes in the Regulations Governing the Certification of Educators in the state of Rhode Island

Respectfully,  
Erin Woulfe

--  
Erin P. Woulfe  
Science Teacher  
East Greenwich High School  
300 Avenger Dr  
East Greenwich RI 02818



150 hours of professional learning units over 5 years. 105 of those must be classified as sustainable. Whether specific units fit the criteria is neither consistent nor mandated by the board which issues certification. All of those hours, and their cost are the responsibility of the educator. These are unreasonable expectations to set for our educators who are actively spending time doing the work to ensure that all students achieve at the high levels needed to lead fulfilling and productive lives, to succeed in academic and employment settings, and to contribute to society.

As a comparison, here is information on continuing education requirements for RI attorneys and Doctors. Attorneys are required to complete 10 hours of annual continuing legal education, much of which is sponsored and provided by the RI Bar association. Doctors are expected to complete 40 hours biennially of continuing medical education, much of which is offered by the Brown Medical School through the Department of Health.

Why am I as an educator expected to find time and money to complete 30 hours of professional learning per year when a lawyer or a doctor only needs to do 10 or 20 respectively? How am I expected to predict what kind of professional learning will be offered in my area so that I can make sure that my choices are sustainable? Why is the Department of Education not expected to offer opportunities for teachers to earn these professional learning units? Why are the Medical association and Bar associations held to higher expectations than the Department of Education? If a teacher expects students to do work, the teacher must offer the opportunity. Why is this not the same for the Department of Education?

I have taught for 16 years and in that time have been recertified based on coursework, an Iplan, the evaluation tool, and now potentially this PLP system. Every time I have been asked about these systems, I have offered comment and I have never heard a response. Coursework alone is unsustainable over a 30 to 40 year career. The Iplan was a logistical nightmare for RIDE to verify. The evaluation system discourages risk taking as not meeting a goal could potentially impact an individual's certification and livelihood. Now this new plan seems like an Iplan with all the responsibility and cost placed on the individual educator. Is this how the Department encourages and facilitates teacher improvement?

The Rhode Island standards for educational leaders specifies the following "Empower and entrust teachers and staff with collective responsibility for meeting the academic, social, emotional, and physical needs of each student, pursuant to the mission, vision, and core values of the district/school." (Std 7G2b) Empower teachers to better themselves, offer reasonable expectations for professional learning, take on some of that burden to offer those opportunities.

I request that you take another look at these requirements. Require a reasonable number of hours of learning. Use our doctors or our lawyers as examples. Take on the responsibility to offer some of that professional development. Eliminate the requirement of sustainability. Recognize that at this time there is no system in place to insure that the Professional Learning offered in this area will meet any particular goal or objective. Hear the frustrations of the educators doing the work in order to increase buy-in and value to our certification process.

**Teixeira, Angela**

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**From:** Andrews, Sherri <sherri\_andrews@nksd.net>  
**Sent:** Tuesday, October 16, 2018 9:22 AM  
**To:** Teixeira, Angela  
**Subject:** Proposed Revisions to Certification for Educators

To Whom it May Concern,

I wholeheartedly oppose the proposed revisions to the certification for educators for many reasons and on many levels. Our district in North Kingstown provides us with professional development opportunities, in fact, we already have 4 Professional Development Days, equal to 28 hours of professional development. What is being asked of us is not only financially strenuous but will also put a strain on our lives outside of school. Financially this will amount to a pay cut if we are asked to be financially responsible for these classes in a time when our salary has been flat for years. Also, as you should know, our days do not end when the school day ends. We are grading papers, planning, creating lessons, building materials, purchasing materials, writing IEPs, completing paperwork, emailing parents/guardians, calling parents/guardians, offering extra help to students, and so much more, all BEYOND the school day and school hours. To add 30 more hours per year, throughout one's career is an unnecessary burden for the hardworking educators in this state. The hardworking, committed, caring, educators far outnumber those that you may feel need more professional development.

I am not sure if you are aware but over the course of my 19 years teaching in this district, we have lost MANY wonderful educators who chose to leave this profession because of the constant barrage of initiates, low pay, and general lack of respect. Educators enter this profession to teach. We do not enter for the salary, the bonuses, or the perks, because those do not exist in tangible ways. We do it for the love of our youth and the desire to teach those that will one day be leading our country. I truly hope this is not another case of "we hear you but we are not listening." Please listen to us. Please respect us. Please do not consider these changes.

I respectfully ask that my comments be part of the record for public comments.

Sincerely,  
Mrs. Andrews

*Special Education  
North Kingstown High School  
North Kingstown School Department*



**Teixeira, Angela**

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**From:** Gormley, Kelly <kelly\_gormley@nksd.net>  
**Sent:** Tuesday, October 16, 2018 9:31 AM  
**To:** Teixeira, Angela  
**Subject:** Proposed Revisions to Certification for Educators

I am opposed to the proposed revisions to the certification for Educators for these reasons:

1. It will impact educators financially. The cost of these courses in addition to the cost to renew multiple certifications would be very impactful.
2. The time is not feasible. Educators are full-time professionals.

**Teixeira, Angela**

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**From:** Lacroix, Briand <briand\_lacroix@nksd.net>  
**Sent:** Tuesday, October 16, 2018 9:32 AM  
**To:** Teixeira, Angela  
**Subject:** Proposed Revisions to Certification

Dear Ms. Teixeira,

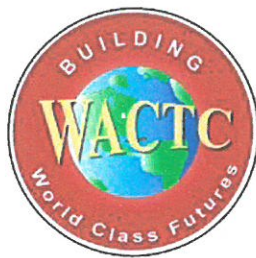
I would like to comment on the proposal to require a PLU equivalent to 30 hours per year for educators to maintain their certifications. Also, please include this statement in the record for public comment.

I find the suggestion that public school educators need to be forced into additional professional development flawed. As I'm sure you are well aware, the mental and emotional demands on teachers is substantial. We are required to do ever more to educate, guide, nurture and protect our students, increasingly with less support from other areas. Additionally, most school systems require their own professional development both during and outside of the school year. A large portion of which are the requirements of the RIDE evaluation system, a tool which in and of itself is onerous. We are a group already invested in learning, our own included. We do not need another requirement foisted upon us by the RI Department of Education.

Sincerely,

Briand Lacroix, M.Ed.  
Special Education Teacher  
North Kingstown High School

400 Aylsworth Ave.  
Woonsocket, RI 02895  
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<http://www.woonsocketschools.com>  
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Phone: 401/767/4664

## **Woonsocket Area Career & Technical Center**

Serving the Communities of:  
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October 16, 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 Director of the Woonsocket Area Career & Technical Center to give support for the proposed changes to teacher certification, in particular the revised CTE teacher certification area. We have faced difficulties in finding quality and qualified teachers in a variety of career and technical areas and hope this will help in our quest in providing our students with the rigor and experiences they deserve. Thank you and your team for your hard work addressing our concerns.

Sincerely,

William E. Webb M. Ed.

Director

Woonsocket Area Career & Technical Center / P-TECH

400 Aylsworth Ave.

Woonsocket, Rhode Island 02895

Phone: 401-767-4660

Fax: 401-767-4665

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## Teixeira, Angela

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**From:** Fantasia, Abigail <abigail\_fantasia@nksd.net>  
**Sent:** Tuesday, October 16, 2018 1:30 PM  
**To:** Teixeira, Angela  
**Subject:** Proposed Revisions to Certification for Educators

To whom it may concern:

I am opposed to the proposed revisions for personal and financial reasons. I already spend a significant amount more than 30 hours of my personal time on my job including professional development and improving my teaching. I go above and beyond to provide extra resources for students and communicating with parents. I spend a lot of money on classroom supplies, software licenses, and have already spent over \$20,000 getting my master's degree. By forcing us to earn 30 PLU's, I will not have as much time to dedicate to my students, or my own family.

Thank you,  
Abigail Fantasia  
Math Teacher  
North Kingstown High School



## Teixeira, Angela

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**From:** Michelle Steever <steevermichelle@gmail.com>  
**Sent:** Tuesday, October 16, 2018 2:09 PM  
**To:** Teixeira, Angela  
**Subject:** Comments for Public Record - Objections To Proposed Revisions To Rhode Island Regulations Governing Educator Certification

Ms. Teixeira,

I am writing to voice my concerns and objections regarding the proposed revisions to the RI regulations governing educator certification.

I am a public school library teacher currently living and teaching in the state of Rhode Island. I have taught in the state of RI for 15 years, and have also taught in the state of Massachusetts. I currently have certification in both Massachusetts and Rhode Island.

While I am pleased that my teacher evaluation, albeit high performing every year since the revised process was put into place, will no longer be tied to my teacher certification (and livelihood), I have a number of objections to the proposed changes outlined below.

I feel that the required 150 hours of professional learning units (section 1.8.2) is particularly onerous for a teacher. How was this amount determined? What specifically will be counted toward PLUs? Sections 1.8.5 B and C require that 75% of the PLUs be sustained and aligned to district priorities yet make it the responsibility of the employee to seek the PLUs. If the district determines a specific skill or knowledge area is a priority, it should be the district's responsibility to provide the PLUs. This proposal fails to make the school district or RIDE responsible in providing PLUs for teachers. I worry that much of my personal time will now be spent taking classes for credit (and PLUs), so that I will not be available to participate on the school-based committees that enrich my school community. Taking for-credit courses also presents an additional financial burden. Where I used to spend my money on teaching materials and "extras" for my library space and students, that money will now be spent on courses instead.

I am concerned about the lack of specificity within the proposals regarding what will be accepted as PLUs. How can requirements be mandated that are not specific? Why are Districts and Superintendents given the authority to approve PLUs? By law, the responsibility for renewing and revoking teacher certification is solely the function of RIDE. The current proposal does not reflect the law. I pay my teacher certification fees to RIDE who therefore have sole authority to approve PLUs directly related to my recertification process.

I am also concerned that there is no appeals process to resolve disputes over district and Superintendent decisions related to PLUs and teacher certification. This is my livelihood and it should not be left up to one person's interpretation of a professional learning experience. If the proposed recommendations are approved giving District / Superintendent the right to make PLU approval, I request that an appeals process is also included.

As a parent and teaching professional, I do not understand how teachers can teach 20% of their work load in an area in which they are not certified (Section 1.9). This is not supporting quality teaching by highly qualified certified professionals and undermines content certification. This provision should be deleted.

Section 1.2A43 should also be removed as it creates a subcategory of registered school nurses. This is a departure from the 1973 legislative mandate that requires school districts to employ certified school nurse teachers. I do not wish to see a revolving door of nurses working in schools who do not have experience working with children in a school setting.

How is cultural competence defined? Section 1.8.11 proposes an Expert Residency Shortages Preliminary Certificate based on Cultural Competence. How is this measured? How can this language be included in professional certification when I do not know what this means? When will it be defined and by whom?

I wish to better understand how pre-service candidates will be expected to complete "the equivalent of a one-year practical residency" for their field experience, yet Teach for America and Alternate Route candidates are held to a lesser standard. A one-year residency presents a financial challenge to many students - particularly in diverse populations for which we need more teachers not fewer candidates. This additional burden of time presents challenges to the cooperating teacher as well. It is already difficult for students to find school districts and teachers willing to take on student teachers, and the changes that makes for a classroom and student learning. Please either change the one-year field experience requirement or make the requirement consistent for all pre-service candidates.

I appreciate your time in reading my remarks and hope you will consider my objections to the above mentioned proposals.

Sincerely,

Michelle Steever  
126 Lyndon Road  
Cranston RI 02905  
401.258.7468