

July 17, 2020

To Whom It May Concern:

As a speech/language pathologist who has worked in RI public schools for over 25 years, I am writing to express my support for the creation of an *All Grade Special Education- Deaf and Hard of Hearing Teacher* certification with a specialization in *Oral/Aural Communication*.

Over the past 25 years, I have worked with many students with hearing loss and I have seen firsthand that the backgrounds and needs of these students vary. While there are some students who require Bilingual-Bicultural (American Sign Language) services and educational approaches, there are others who require Auditory-Oral (residual hearing and speech) or Total Communication (auditory and visual communication) approaches in order to be successful in the educational setting. The type of communication method that the families of children with hearing loss choose is a very personal decision that is dependent upon many factors. Hence, the services and educational approaches provided to the students must also be diverse in order to meet their needs.

A teacher with specialization in Auditory-Oral methods of instruction is uniquely able to support students in developing listening, language, and self-advocacy skills in addition to working within the mainstream classroom to support school personnel with hearing technology.

I hope that RIDE will support the diverse needs of students with hearing loss in our state by creating the *All Grade Special Education- Deaf and Hard of Hearing Teacher* certification, with a specialization in *Oral/Aural Communication*. This will ensure that all RI students with hearing loss have access to services that meet their individual needs and that the services are delivered by qualified professionals.

I appreciate your time and consideration of this matter.

Sincerely,
Kerri Hindinger, MS CCC-SLP
Speech Language Pathologist

Teixeira, Angela

From: Susan Rose <susan.rose@warwickschools.org>
Sent: Friday, July 17, 2020 10:53 AM
To: Teixeira, Angela
Subject: Oral/Aural Communication

To Whom It May Concern:

I am writing in support of the proposed creation of a second All Grade Special Education- Deaf and Hard of Hearing Teacher certification, with a specialization in Oral/Aural Communication.

As Speech-Language Pathologist, I work closely with Teachers of the Deaf and Hard of Hearing. These teachers possess very specialized skills and our teams rely upon them for the proper instruction of children and adolescents with varied hearing abilities as they gain access to education.

In support of these colleagues, I respectfully urge the Rhode Island Department of Education to recognize and acknowledge the diverse needs of all students with hearing loss and choose to equally represent all Teachers of the Deaf by offering the All Grade Special Education- Deaf and Hard of Hearing Teacher certification, with a specialization in Oral/Aural Communication. This will ensure that students with hearing loss are being provided with appropriate services by qualified professionals.

Your time and attention to this matter is much appreciated.

Sincerely,

Susan C. Rose, M.S., CCC-SLP
Speech-Language Pathologist
Warwick Early Learning Center
325 Miantonomo Drive
Warwick, RI 02888
(401) 921-0722

Confidentiality Clause: *The e-mail and any attachments thereto contain privileged and confidential information intended only for this e-mail or any attachments thereto is not the intended recipient or an agent of the intended recipient, you are hereby notified that any dissemination or copying of this e-mail or attachments are strictly prohibited. If you have received this e-mail in error, please notify sender immediately by return e-mail and delete all messages and any attachments pertaining to this e-mail. Thank you.*

Teixeira, Angela

From: Jennifer Wallace <jennifer.wallace@warwickschools.org>
Sent: Sunday, July 19, 2020 3:14 PM
To: Teixeira, Angela
Subject: Proposed creation of a Second All Grade Teaching Position (Deaf and Hard of Hearing Certification/Oral-Aural)

Dear Council on Elementary and Secondary Education,

I am writing to support the proposed creation of a Second All Grade Special Education-Deaf and Hard of Hearing Certification with a specialization in oral/aural communication.

Students with hearing loss have unique needs and diverse backgrounds that require services and educational approaches that address their profile of strengths and deficits. More specifically students and families may be best supported with one of **the following approaches:**

1. Bilingual-Bicultural (American Sign Language)
2. Auditory-Aural (residual hearing and speech)
3. Total Communication (incorporate auditory and visual approaches)

An Auditory-Oral Teacher of the Deaf and Hard of Hearing has a dynamic and diverse job description including but not limited to the following :

1. Supporting students in developing the listening , language, and self advocacy skills they need to benefit from and participate (as fully as possible) in the mainstream classroom.
2. Working with the mainstream classroom to support school personnel with hearing technology and to provide them with insight on the unique needs of students with hearing loss.
3. Supporting all communication and educational methods and assists families in choosing a format that is best suited for them and their child.

I respectfully urge the Rhode Island Department of Education to recognize and acknowledge the diverse needs of all students with hearing loss and choose to equally represent all Teachers of the Deaf . This can be done by accepting and endorsing the All Grade Special Education-Deaf and Hard of Hearing Teacher Certification, with a specialization in Oral/Aural Communication. This will ensure that students with hearing loss are being provided with appropriate services by qualified professionals.

I respectfully urge the Rhode Island Department of Education to recognize and acknowledge the diverse needs of all students with hearing loss.

Thank you for your time and consideration in this matter,

Jennifer L Wallace CCC-SLP 07/19/2020

--

Jennifer L. Wallace
Speech-Language Pathologist
Warwick Public schools/Cedar Hill
jennifer.wallace@warwickschools.org
401-734-3535

confidentiality clause:

This e-mail and any attachments thereto contain privileged and confidential information intended for the use of the sender and the recipient(s) to whom this e-mail is specifically addressed. If the reader of this email or any attachments thereto is not the intended recipient or an agent of the recipient, you are hereby notified that any dissemination or copying of this e-mail or attachments are strictly prohibited. If you have received this email in error, please notify the sender immediately by returning the email and delete all messages and any attachments pertaining to this email. thank you.

Confidentiality Clause: *The e-mail and any attachments thereto contain privileged and confidential information intended only for this e-mail or any attachments thereto is not the intended recipient or an agent of the intended recipient, you are hereby notified that any dissemination or copying of this e-mail or attachments are strictly prohibited. If you have received this e-mail in error, please notify sender immediately by return e-mail and delete all messages and any attachments pertaining to this e-mail. Thank you.*

July 20, 2020

Dear Council on Elementary and Secondary Education:

I am writing in support of the proposed creation of a second All Grade Special Education- Deaf and Hard of Hearing Teacher certification, with a specialization in Oral/Aural Communication.

Students with hearing loss have diverse backgrounds and needs. Because of this, the services and educational approaches provided to students with hearing loss varies greatly. Some students with hearing loss utilize Bilingual-Bicultural (American Sign Language) services and educational approaches while others utilize Auditory-Oral (residual hearing and speech) or Total Communication (auditory and visual communication) approaches.

As an Auditory-Oral Teacher of the Deaf and Hard of Hearing, I support my students in developing the listening, language, and self-advocacy skills they need to benefit from and participate as fully as possible in the mainstream classroom. Part of my role as an Auditory-Oral Teacher of the Deaf also involves working within the mainstream classroom to support school personnel with hearing technology and to provide them with insight on the unique needs of students with hearing loss. Although I am an Auditory-Oral Teacher of the Deaf, I support all communication and educational methods and firmly believe that all families should choose a method that is best suited for them and their child.

I respectfully urge the Rhode Island Department of Education to recognize and acknowledge the diverse needs of all students with hearing loss and choose to equally represent all Teachers of the Deaf by offering the All Grade Special Education- Deaf and Hard of Hearing Teacher certification, with a specialization in Oral/Aural Communication. This will ensure that students with hearing loss are being provided with appropriate services by qualified professionals.

Thank you for your time and consideration regarding this matter.

Sincerely,

Jacqueline Hartley, MEd./LSLS Cert. AVEd.
Teacher of the Deaf and Hard of Hearing

Teixeira, Angela

From: Kristie McQuaide <kmcquaide@bischool.net>
Sent: Monday, July 20, 2020 1:27 PM
To: Teixeira, Angela
Subject: Forced to teach out of certification

Hello,

I am not sure who I should be asking about this, so please forward my email to that person if it is not you. My question is about the rule that says teachers can teach 20% out of their certification, but it must be mutually agreed upon. If I agreed to teach out of my certification last year, does that carry over year after year? Or does administration need to ask me each year? Thanks for your help.

Sincerely,
Kristie McQuaide

Teixeira, Angela

From: Kerri Hindinger <kerri.hindinger@warwickschools.org>
Sent: Monday, July 20, 2020 2:28 PM
To: Teixeira, Angela
Subject: proposal of the Oral/Aural DHH teacher certification

Dear Ms. Teixeira,

I hope this email finds you well.

Please see the attached letter in support of the creation of an Oral/Aural DHH teacher certification.

Thank you for your time and consideration.

Sincerely,
Kerri Hindinger



Letter to support Oral/Aural...

--

Kerri Hindinger, M.S. CCC-SLP
Speech-Language Pathologist
Warwick Public Schools
Lippitt Elementary 401.734.3240
Assistive Technology Office 401.921.1701

Confidentiality Clause: *The e-mail and any attachments thereto contain privileged and confidential information intended only for this e-mail or any attachments thereto is not the intended recipient or an agent of the intended recipient, you are hereby notified that any dissemination or copying of this e-mail or attachments are strictly prohibited. If you have received this e-mail in error, please notify sender immediately by return e-mail and delete all messages and any attachments pertaining to this e-mail. Thank you.*

July 20, 2020

Dear Council on Elementary and Secondary Education:

I am writing regarding the proposed amendments to the regulations governing the certification of educators in Rhode Island that will be presented for public review and comment on July 22, 2020. I am writing specifically in support of the proposal for the new certification of *All Grades Special Education – Deaf and Hard of Hearing Education PreK-12, Oral/Aural Communication*. The proposed new certification will meet the diverse needs of students with hearing loss in Rhode Island, ensure equal representation of all Teachers of the Deaf and Hard of Hearing, and will greatly help our significant Teacher of the Deaf and Hard of Hearing shortage.

Deaf education is a unique profession because individuals with hearing loss use diverse communication modes and learn by different educational approaches. Some families are Bilingual/Bicultural and use American Sign Language, some use Total Communication combining visual and auditory communication, and others are Auditory-Oral, or Oral/Aural, using aided hearing and spoken language. These different approaches provide families and students with options of communication modes based on individual abilities, needs, and family choice. In order to provide families these options, they need access to professionals who are trained and certified in these areas.

I have been an Auditory-Oral Educator of the Deaf and Hard of Hearing for the past twenty-two years, twenty-one of which have been in Rhode Island. I teach children to use their residual aided hearing or implanted hearing to develop listening and spoken language skills and how to self-advocate for their needs as they are fully integrated in classes with their typically-hearing peers. Additionally, I collaborate with regular education teachers and staff about assistive listening technology and accommodating students with hearing loss so that they have access to instruction and social conversation. While I am an Auditory-Oral Teacher of the Deaf and Hard of Hearing, I support all modes of communication for children with hearing loss and believe that the communication mode and educational approach is the family's choice. By adopting this new certification, Rhode Island will provide for the diverse needs of students with hearing loss and will represent all Teachers of the Deaf and Hard of Hearing - therefore meeting the highest standards of current best practice in Deaf Education.

I respectfully urge that you approve the proposal for the new certification, *All Grades Special Education – Deaf and Hard of Hearing Education PreK-12, Oral/Aural Communication*. Thank you for your time and consideration of this important matter.

Regards,

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

July 22, 2020

Dear Council on Elementary and Secondary Education:

I am writing in support of the proposal for the new certification of All Grades Special Education-Deaf and Hard of Hearing Education PreK-12, Oral/Aural Communication.

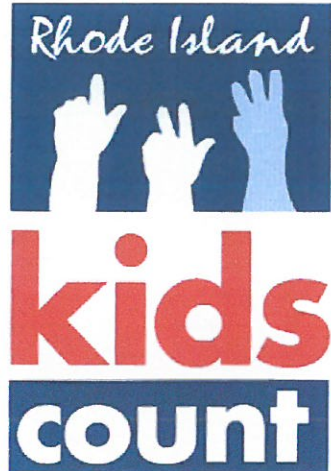
The Teachers of the Deaf and Hard of Hearing in my district have been advocating for this new designation for about four years. As stated by one, "We have been advocating for the Rhode Island Department of Education to create a second Teacher of the Deaf certification option so that all Teachers of the Deaf (i.e., ASL, Total Communication, Auditory-Oral) can be equally represented and all students with hearing loss can be provided with appropriate services by qualified professionals." Educators in my district are so pleased this certification has been defined and proposed.

As a public school speech language pathologist, I work with students who have hearing loss. However most of these students still have residual hearing and are educated at their home school in the general education setting. While most students with hearing loss participate in a regular education setting, they still benefit immensely from working with an Auditory-Oral Teacher of the Deaf and Hard-of-Hearing. Working on caring for their hearing aids, advocating for themselves regarding their hearing needs, learning how to use and leverage residual hearing, as well as manage continuing hearing loss are all skills that help immeasurably within school and beyond. The new certification of All Grades Special Education- Deaf and Hard of Hearing Education PreK-12, Oral/Aural Communication takes all of this into account and recognizes the unique and diverse skills provided by these teachers to the students with more moderate hearing loss.

I am confident that the Rhode Island Department of Education sees the benefit of providing services to all students with hearing loss regardless of the level of severity as well as the need to ensure that these students are being taught by trained and qualified professionals and will approve the new certification of All Grades Special Education- Deaf and Hard of Hearing Education PreK-12, Oral/Aural Communication.

Sincerely,

Sarah Desrocher, M.S., CCC-SLP
Speech Language Pathologist - Warwick Public Schools
Rhode Island Speech-Language Hearing Association executive board member



RHODE ISLAND KIDS COUNT
ONE UNION STATION
PROVIDENCE, RHODE ISLAND 02903
401/351-9400 • 401/351-1758 (FAX)

August 7, 2020

Angela Teixeira,
Council on Elementary and Secondary Education
255 Westminster Street
Providence, RI 02903

Dear Ms. Teixeira:

Thank you for the opportunity to review the proposed changes to the 200RICR2020-1 regulations for *Certification of Educators in Rhode Island*.

Rhode Island KIDS COUNT supports the following changes to expand the pool of educator candidates that can compete for teaching jobs in Rhode Island and provide effective educational experiences to our students from preschool through Grade 12 and to promote the development of an effective bilingual/dual language teaching workforce.

- 1.7.B2d Initial Routes to Full Certification changes to **lengthen the time for applicants to apply for a teaching certificate to 10 years** after completing an approved teacher certification program in Rhode Island.
- 1.7.C1 and 2 Initial Routes to Full Certification changes to **allow for demonstration of three years of effective teaching in another state and to expand reciprocity** to accept teacher certification from specific additional states beyond Massachusetts and Connecticut and the District of Columbia.
- 1.9.1 Early Childhood Teacher Certification **changes to regulations that support certification of bilingual and dual language educators with specific grade span knowledge (e.g. PK-Grade 2) so the state can more effectively build bilingual and dual language general education programs that begin in early childhood when language acquisition is most efficient and effective.** Bilingual and dual language programs should be established and expanded across the state to capitalize and strengthen children's home languages and to increase the number of bilingual students and graduates. We support the strategy to use non-bilingual ESOL certified teachers across grade spans to provide supplementary educational services to the general education program so they can work with siblings and families as they learn English.

Rhode Island KIDS COUNT was pleased to serve on the *Blueprint for Multilingual Learner (MLL) Success Team* alongside dedicated students, parents, educators and community stakeholders convened by the Rhode Island Department

of Education to identify, implement, and sustain more effective policies and practices for MLLs in Rhode Island. We support efforts to expand children's access to high-quality dual language bilingual programs and to increase the capacity of the educators who serve them. Dual language bilingual programs can significantly improve English reading proficiency, decrease high school dropout rates, increase the likelihood of going to college, and improve economic outcomes for MLL students. High-quality dual language bilingual education, starting in the early grades or in preschool, effectively promotes English language acquisition and proficiency while also building proficiency in a child's native language. In the 2018-2019 school year, MLL students were 10% (13,792) of total students, and 39% of all MLL students in Rhode Island were in grades preschool to grade three.

Opposition: Rhode Island KIDS COUNT is **not opposed to any proposed changes** to the regulations.

Additional Comments: Rhode Island KIDS COUNT makes the following recommendations to improve our state's certification system for early educators and (PK-Grade 3) building principals:

- Rhode Island is [one of 41 states that has an Early Childhood Teaching Certificate, License or Endorsement](#) to ensure teachers of young children up through age 8 have the necessary knowledge of young children's development and learning and demonstrate strong teaching practices with young children. However, this teaching certificate is only required for teaching the preschool grades and Kindergarten (children ages 3-6). **Rhode Island KIDS COUNT recommends the state move to requiring the Early Childhood teaching certificate for all teachers in 1st and 2nd grades.** Young children learn differently than older children and specific skills and knowledge are needed to consistently and effectively teach children ages 3 through 8.
- Rhode Island KIDS COUNT recommends the state require that the **Early Childhood Teaching Certificate include additional requirements:**
 - Complete RIDE-approved professional development in the **Rhode Island Early Learning Standards** (currently required for the RI Pre-K program and in the BrightStars Quality Rating and Improvement System),
 - Complete **coursework in science-based reading instruction, including the development of early language and pre-reading skills.** We applaud the addition of coursework on reading instruction to the Grades 1-6 teaching certificate, but effective early language and literacy instruction does not begin in first grade. **Similarly, effective instruction in ELA, math, science, and social studies** does not begin in first grade and should be included in the early childhood teaching certificate's requirements.
- In 2016, the [Rhode Island Early Learning Council recommended](#) that the state increase the percentage of teachers of grades K-3 that have an early childhood teaching certificate, consider

expanding the teaching certificate to include Grade 3, and consider requiring the teaching certificate for grades 1-2.

- 1.8.16 Endorsements: Rhode Island KIDS COUNT supports the creation and implementation of endorsements to build expertise in specific knowledge and practices. We **recommend the establishment of an early childhood endorsement for building principals** so they can effectively serve as an administrative and pedagogical leader with knowledge of specific teaching practices (including play-based learning strategies) that are effective with young children and building policies and practices that support high-quality early childhood teaching – such as family-style meals and snacks, supervision and support of toileting and diapering, and safe transportation practices.
- In 2016, the [Rhode Island Early Learning Council](#) recommended that the state develop an add-on certificate or endorsement for school administrators responsible for grades PK-3 so they have training in early childhood development and learning and ensure that early care and education content is integrated into the elementary principal certificate programs for new principals.

Here are some essential resources:

[Education Commission of the States: A Policymakers Guide for Preschool – Grade 3](#)

[National Association of Elementary School Principals: A Vision for Transforming Education Across the Pre-K to Grade 3 Years](#)

[New America: One Size Does Not Fit All: The Need for Specialized Teacher Licenses in the Early Grades](#)

[National Governors Association: Leading for Early Success: Building School Principals' Capacity to Lead High-Quality Early Education](#)

[Encouraging the Development and Achievement of Dual Language Learners in Early Childhood](#)

Thank you for considering these recommendations. Let us know if we can provide any additional information.



Leanne C. Barrett
Senior Policy Analyst

#1

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, July 21, 2020 11:14:17 AM
Last Modified: Tuesday, July 21, 2020 11:20:16 AM
Time Spent: 00:05:58
IP Address: 173.69.60.84

Page 1: Proposed Certification Regulation Changes July 2020

Q1

Please identify what you support in regards to the proposed certification regulations. (Please identify the proposed certification regulation topic(s) you support. Identify the specific regulation by section and title, and provide a detailed response as to why you support this proposal change).

na

Q2

What concerns do have with regards to the proposed regulations? (Please identify the proposed certification regulation topic(s) you support. Identify the specific regulation by section and title, and provide a detailed response as to why you support this proposal change).

1.9.1 D, 1.9.2 D, 1.9.3 H, 1.9.4 M (Teaching English to Speakers of Other Languages)

Each of the above referenced sections of certification are struck through, thus eliminating the TESOL certificate at all levels (Early Childhood, Elementary, Middle Level, and Secondary). Why would this certification be eliminated? What about those who are already certified in this area? What happens to all those who were required to enroll in an approved program as a condition of employment?

I do not support the elimination of the TESOL certificates. I am a certified TESOL educator with a Master's Degree in TESOL.

Q3

Respondent skipped this question

Additional comments. (Please identify the proposed certification regulation topic(s) you support. Identify the specific regulation by section and title, and provide a detailed response as to why you support this proposal change).

JUL 31 '20 PM01:45

#2

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, July 21, 2020 4:20:59 PM
Last Modified: Tuesday, July 21, 2020 4:25:11 PM
Time Spent: 00:04:11
IP Address: 72.192.38.130

Page 1: Proposed Certification Regulation Changes July 2020

Q1

Respondent skipped this question

Please identify what you support in regards to the proposed certification regulations. (Please identify the proposed certification regulation topic(s) you support. Identify the specific regulation by section and title, and provide a detailed response as to why you support this proposal change).

Q2

What concerns do have with regards to the proposed regulations? (Please identify the proposed certification regulation topic(s) you support. Identify the specific regulation by section and title, and provide a detailed response as to why you support this proposal change).

PLU - is there a requirement for plu's if you are retired but still want to renew and hold a valid certificate? Is there a requirement if you just want to sub for the 90 days that are permitted by the R.I. pension board?

Q3

Respondent skipped this question

Additional comments. (Please identify the proposed certification regulation topic(s) you support. Identify the specific regulation by section and title, and provide a detailed response as to why you support this proposal change).

#3

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, July 22, 2020 12:15:39 PM
Last Modified: Wednesday, July 22, 2020 12:25:12 PM
Time Spent: 00:09:32
IP Address: 108.34.128.109

Page 1: Proposed Certification Regulation Changes July 2020

Q1

Please identify what you support in regards to the proposed certification regulations. (Please identify the proposed certification regulation topic(s) you support. Identify the specific regulation by section and title, and provide a detailed response as to why you support this proposal change).

Certification Regulation:

1.9.5 All Grades Teacher Certificates

O. All Grades Special Education - Deaf and Hard of Hearing Teacher PK-12 - Oral/Aural Communication

I am pleased to see that the current draft proposes 2 different certification types for Deaf and Hard of Hearing students (ASL and Oral/Aural). I support the acknowledgement of the different communication needs of RI Deaf and Hard of Hearing students and am hopeful that this will allow RI to better serve its students.

Q2

What concerns do have with regards to the proposed regulations? (Please identify the proposed certification regulation topic(s) you support. Identify the specific regulation by section and title, and provide a detailed response as to why you support this proposal change).

Certification Regulation:

1.9.5 All Grades Teacher Certificates

O. All Grades Special Education - Deaf and Hard of Hearing Teacher PK-12 - Oral/Aural Communication

I noticed that while there is a requirement in the DHH Oral/Aural Communication certification for awareness of/comfort with American Sign Language (as evidenced by the assessment/credit requirement), there does not appear to be a comparable requirement of exposure to and awareness of Oral/Aural Communication in the DHH ASL certification. I was wondering what the rationale for this was.

Additionally, I am curious about how the 9-credit requirement for ASL was determined. In looking for some of the options in Rhode Island for courses in ASL in which credits are given, it appears as though classes are between 3 and 4 credits each. For example, 3 credits are offered for each ASL course at CCRI. In order to complete the 9-credit requirement, an individual would need to complete levels 1 through 3. Given that CCRI offers only 4 levels of ASL, this appears as though this expectation exceeds exposure to and awareness of ASL. Similarly, 4 credits are offered for each ASL course at RIC. In order to complete the 9-credit requirement, someone would need to take both of those ASL courses, but would then be 1-credit short.

Q3

Additional comments. (Please identify the proposed certification regulation topic(s) you support. Identify the specific regulation by section and title, and provide a detailed response as to why you support this proposal change).

Certification Regulation:

1.9.5 All Grades Teacher Certificates

O. All Grades Special Education - Deaf and Hard of Hearing Teacher PK-12 - Oral/Aural Communication

While I feel that exposure to ASL is an appropriate requirement of the certification, I worry that the 9-credit requirement will continue to prevent many candidates from obtaining the All Grades Special Education - Deaf and Hard of Hearing Education PreK-12 Oral/Aural Communication. I know that the alternative to the 9 credit hours is a RI approved ASL assessment and I am curious as to what assessment is expected of applicants, and if is the same one that has historically been required. If so, knowing that Auditory-Oral Teachers of the Deaf in RI have struggled to pass this exam, is there an alternative assessment that may be used.

The United States continues to have a critical shortage of Teachers of the Deaf. Currently, there are 4 job postings on School Spring in Rhode Island for Teachers of the Deaf – 2 of which require ASL, and 2 of which do not. This is very concerning, given the current regulations, as well as the ASL requirement as written in the proposed changes to the regulations, as Rhode Island has struggled for many years now to fill such positions.

#4

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, July 22, 2020 10:35:43 AM
Last Modified: Wednesday, July 22, 2020 12:44:55 PM
Time Spent: 02:09:11
IP Address: 76.24.167.26

Page 1: Proposed Certification Regulation Changes July 2020

Q1

Please identify what you support in regards to the proposed certification regulations. (Please identify the proposed certification regulation topic(s) you support. Identify the specific regulation by section and title, and provide a detailed response as to why you support this proposal change).

1.9.5 All Grades Teacher Certificates

O. All Grades Special Education - Deaf and Hard of Hearing Teacher PK-12 - Oral/Aural Communication

I support the All Grades Teacher Certificates, specifically the proposed All Grades Special Education - Deaf and Hard of Hearing Teacher PK-12 - Oral/Aural Communication Certification. I support this proposed change because I believe that all students with hearing loss should be provided with appropriate services by qualified Teachers of the Deaf and Hard of Hearing. Because students with hearing loss have diverse backgrounds and needs, they learn and communicate differently. The proposed All Grades Special Education- Deaf and Hard of Hearing Teacher PK-12- Oral/Aural Communication Certification will ensure that students with hearing loss that utilize speech and residual hearing are being provided with appropriate and necessary services by Teachers of the Deaf and Hard of Hearing who are familiar with their specific needs.

Q2

What concerns do have with regards to the proposed regulations? (Please identify the proposed certification regulation topic(s) you support. Identify the specific regulation by section and title, and provide a detailed response as to why you support this proposal change).

1.9.5 All Grades Teacher Certificates

O. All Grades Special Education - Deaf and Hard of Hearing Teacher PK-12 - Oral/Aural Communication

If the All Grades Special Education - Deaf and Hard of Hearing Teacher PK-12 - Oral/Aural Communication Certification is not offered, I am concerned that many students with hearing loss who utilize Auditory-Oral communication and educational approaches will not be provided with appropriate and necessary services. Teachers of the Deaf that specialize in an Auditory-Oral approach are familiar with the academic challenges that students with hearing loss experience and they target specific skills to support their students' ability to listen and learn in the classroom setting. Auditory-Oral Teachers of the Deaf are also aware of potential challenges that students with hearing loss face in the mainstream setting and they provide students with strategies to handle these potential difficulties. Part of their role also involves supporting school personnel with hearing technology. Other professionals that work with students through other educational approaches are mostly unaware of the issues faced by these students. Therefore, I believe that the All Grades Special Education - Deaf and Hard of Hearing Teacher PK-12 - Oral/Aural Communication Certification is essential for students with hearing loss who utilize speech and residual hearing to have the support of qualified Auditory-Oral Teachers of the Deaf so that they can benefit from and participate as fully as possible in the mainstream setting.

Q3

Additional comments. (Please identify the proposed certification regulation topic(s) you support. Identify the specific regulation by section and title, and provide a detailed response as to why you support this proposal change).

1.9.5 All Grades Teacher Certificates

O. All Grades Special Education - Deaf and Hard of Hearing Teacher PK-12 - Oral/Aural Communication

I respectfully urge the Rhode Island Department of Education to recognize and acknowledge the diverse needs of all students with hearing loss and choose to equally represent all Teachers of the Deaf by offering the All Grades Special Education - Deaf and Hard of Hearing Teacher PK-12 - Oral/Aural Communication Certification. Thank you for your time and consideration.

#5

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, July 22, 2020 3:37:18 PM
Last Modified: Wednesday, July 22, 2020 3:39:37 PM
Time Spent: 00:02:18
IP Address: 174.196.193.39

Page 1: Proposed Certification Regulation Changes July 2020

Q1

Please identify what you support in regards to the proposed certification regulations. (Please identify the proposed certification regulation topic(s) you support. Identify the specific regulation by section and title, and provide a detailed response as to why you support this proposal change).

Leadership/ Administration for k-12 Principals.

Q2

What concerns do have with regards to the proposed regulations? (Please identify the proposed certification regulation topic(s) you support. Identify the specific regulation by section and title, and provide a detailed response as to why you support this proposal change).

It is a great way to get started on attracting talented people to work with students in Rhode Island.

Q3

Additional comments. (Please identify the proposed certification regulation topic(s) you support. Identify the specific regulation by section and title, and provide a detailed response as to why you support this proposal change).

I support all of them.

#6

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, July 21, 2020 4:01:19 PM
Last Modified: Wednesday, July 22, 2020 9:36:40 PM
Time Spent: Over a day
IP Address: 74.103.204.51

Page 1: Proposed Certification Regulation Changes July 2020

Q1

Please identify what you support in regards to the proposed certification regulations. (Please identify the proposed certification regulation topic(s) you support. Identify the specific regulation by section and title, and provide a detailed response as to why you support this proposal change).

1.9.5 All Grades Teacher Certificate
and Hard of Hearing Teacher PK-12 – Oral/Aural Communication

O. All Grades Special Education – Deaf

I support the proposal of the new certificate, All Grades Special Education – Deaf and Hard of Hearing Teacher PK-12 – Oral/Aural communication because I firmly believe that families of children with hearing loss should have the option to choose among all modes of communication and educational approaches. It is important for RI to provide our students with hearing loss the services provided by qualified Teachers of the Deaf and Hard of Hearing who have expertise in a specific mode of communication and educational methodology – whether it is American Sign Language or Oral/Aural Communication. An Oral/Aural Teacher of the Deaf certification will provide trained, qualified professionals who will understand their students' unique needs and be able to teach their students to learn listening and spoken language skills and to access instruction using these communication skills, assistive technology, and self-advocacy skills.

Additionally, I support the change that the certified Teacher of the Deaf and Hard of Hearing is not required to have an additional general education certification if they are not the teacher of record. We have a significant shortage of Teachers of the Deaf and Hard of Hearing in RI. These changes will hopefully attract more teachers to RI to apply for the DHH teacher certification as it more closely aligns with the regulations in other states. Thank you.

Q2

What concerns do you have with regards to the proposed regulations? (Please identify the proposed certification regulation topic(s) you support. Identify the specific regulation by section and title, and provide a detailed response as to why you support this proposal change).

1.9.5 All Grades Teacher Certificate
and Hard of Hearing Teacher PK-12 – Oral/Aural Communication

O. All Grades Special Education – Deaf

I am concerned that if the certification is not approved by the Council of Elementary and Secondary Education and passed by the legislature, that many students with hearing loss who use listening and spoken language communication and educational approaches will not be provided with appropriate services. Teachers of the Deaf who specialize in the Auditory-Oral approach have expertise in developing listening and spoken language skills, teaching students to utilize assistive listening technology, to self-advocate for their needs and how to best access instruction and social conversation. Auditory-Oral Teachers of the Deaf and Hard of Hearing understand the unique needs of a student with hearing loss who is fully integrated in class with their typically hearing peers. They educate classroom teachers, staff, and peers about accommodations and strategies that provide access to the student with hearing loss. I firmly believe that RIDE's proposal of the All Grades Special Education – Deaf and Hard of hearing Teacher PK-12 – Oral/Aural Communication is critical for students with hearing loss who use listening and spoken language to have the support of a certified Oral/Aural Teacher of the Deaf so they may participate fully with in their home schools.

Additionally, I am concerned about the required 9 credits of ASL in order for a teacher to become certified as an Oral/Aural Teacher of the Deaf and Hard of Hearing in RI. There are several reasons for my concern. While I feel exposure to ASL is an appropriate requirement of the certification, our highly specialized training programs provide learning and experiences that go far beyond ASL exposure. We learn about Deaf culture, the Deaf community, the diversity of individuals with hearing loss, ASL, and Bilingual/Bicultural identity. Secondly, I am concerned that 9 credits of ASL, which is approximately 23% of a 40-credit graduate program course requirement, will not be a part of any Auditory-Oral graduate program. The teacher candidate would have to take an additional three courses to meet this requirement. I worry that this is excessive and will dissuade potential Oral/Aural DHH teacher candidates from seeking certification in RI, where we already have a significant shortage. Finally, my concern is that a similar requirement for Oral/Aural exposure is not listed as a requirement for the American Sign Language teacher certificate – thus creating disparate requirements. I ask that you consider that both types of deaf education teacher training programs may already have the necessary courses and field experiences to provide beyond exposure to all communication modes and educational approaches, thereby eliminating the need to require additional specified coursework. Thank you.

Q3

Additional comments. (Please identify the proposed certification regulation topic(s) you support. Identify the specific regulation by section and title, and provide a detailed response as to why you support this proposal change).

1.9.5 All Grades Teacher Certificate
and Hard of Hearing Teacher PK-12 – Oral/Aural Communication

O. All Grades Special Education – Deaf

I am extremely grateful that the team at RIDE has worked so hard to listen to our concerns and for their efforts in creating the proposal for the new certification. I respectfully urge that you approve the proposal for the new certification, All Grades Special Education – Deaf and Hard of Hearing Education PreK-12, Oral/Aural Communication. By passing the proposed changes to the regulations to include this new certification, Rhode Island will provide for the diverse needs of students with hearing loss, represent all Teachers of the Deaf and Hard of Hearing, address the significant teacher shortage in this area, and meet the highest standards of current best practice in Deaf Education.

Thank you for your time and consideration of this important matter.

#7

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Saturday, July 25, 2020 2:05:01 PM
Last Modified: Saturday, July 25, 2020 2:20:25 PM
Time Spent: 00:15:24
IP Address: 108.12.232.163

Page 1: Proposed Certification Regulation Changes July 2020

Q1

Please identify what you support in regards to the proposed certification regulations. (Please identify the proposed certification regulation topic(s) you support. Identify the specific regulation by section and title, and provide a detailed response as to why you support this proposal change).

I am supportive of 1.10.1 Building Level Administrator Certificate B Building Level Administrator PK-12 Fast-track and 1.8.13 Fast-Track Principal Expert Residency Preliminary Certificate. RIDE should be working to empower superintendents and school committees to put the strongest candidates possible into positions of school leadership. Completing a formal leadership development program at a college or university is not a predictor of success for this role. I am excited that RIDE is opening up certification so that people who have experience teaching and leading in schools can become administrators without first having to complete a leadership degree. I am also supportive of 1.7.C Eligibility for Certification through Reciprocity with Other States. RIDE should work to make it as easy as possible for schools to hire the people they think are most likely to be successful as teachers. Increasing the number of states that we have direct certification reciprocity with is a positive step towards removing barriers to schools being able to hire individuals they feel are best qualified to fill their vacant positions.

Q2

What concerns do you have with regards to the proposed regulations? (Please identify the proposed certification regulation topic(s) you support. Identify the specific regulation by section and title, and provide a detailed response as to why you support this proposal change).

I do not have any concerns with these proposed regulation changes.

Q3

Additional comments. (Please identify the proposed certification regulation topic(s) you support. Identify the specific regulation by section and title, and provide a detailed response as to why you support this proposal change).

I appreciate RIDE creating and disseminating this survey to gather public opinion on these proposed regulation changes.

#8

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, August 07, 2020 4:52:06 PM
Last Modified: Friday, August 07, 2020 4:53:42 PM
Time Spent: 00:01:36
IP Address: 74.97.54.70

Page 1: Proposed Certification Regulation Changes July 2020

Q1

Please identify what you support in regards to the proposed certification regulations. (Please identify the proposed certification regulation topic(s) you support. Identify the specific regulation by section and title, and provide a detailed response as to why you support this proposal change).

Rhode Island KIDS COUNT supports the following changes to expand the pool of educator candidates that can compete for teaching jobs in Rhode Island and provide effective educational experiences to our students from preschool through Grade 12 and to promote the development of an effective bilingual/dual language teaching workforce.

- 1.7.B2d Initial Routes to Full Certification changes to lengthen the time for applicants to apply for a teaching certificate to 10 years after completing an approved teacher certification program in Rhode Island.
- 1.7.C1 and 2 Initial Routes to Full Certification changes to allow for demonstration of three years of effective teaching in another state and to expand reciprocity to accept teacher certification from specific additional states beyond Massachusetts and Connecticut and the District of Columbia.
- 1.9.1 Early Childhood Teacher Certification changes to regulations that support certification of bilingual and dual language educators with specific grade span knowledge (e.g. PK-Grade 2) so the state can more effectively build bilingual and dual language general education programs that begin in early childhood when language acquisition is most efficient and effective. Bilingual and dual language programs should be established and expanded across the state to capitalize and strengthen children's home languages and to increase the number of bilingual students and graduates. We support the strategy to use non-bilingual ESOL certified teachers across grade spans to provide supplementary educational services to the general education program so they can work with siblings and families as they learn English.

Rhode Island KIDS COUNT was pleased to serve on the Blueprint for Multilingual Learner (MLL) Success Team alongside dedicated students, parents, educators and community stakeholders convened by the Rhode Island Department of Education to identify, implement, and sustain more effective policies and practices for MLLs in Rhode Island. We support efforts to expand children's access to high-quality dual language bilingual programs and to increase the capacity of the educators who serve them. Dual language bilingual programs can significantly improve English reading proficiency, decrease high school dropout rates, increase the likelihood of going to college, and improve economic outcomes for MLL students. High-quality dual language bilingual education, starting in the early grades or in preschool, effectively promotes English language acquisition and proficiency while also building proficiency in a child's native language. In the 2018-2019 school year, MLL students were 10% (13,792) of total students, and 39% of all MLL students in Rhode Island were in grades preschool to grade three.

Q2

What concerns do have with regards to the proposed regulations? (Please identify the proposed certification regulation topic(s) you support. Identify the specific regulation by section and title, and provide a detailed response as to why you support this proposal change).

Rhode Island KIDS COUNT is not opposed to any proposed changes to the regulations.

Q3

Additional comments. (Please identify the proposed certification regulation topic(s) you support. Identify the specific regulation by section and title, and provide a detailed response as to why you support this proposal change).

Additional Comments: Rhode Island KIDS COUNT makes the following recommendations to improve our state's certification system for early educators and (PK-Grade 3) building principals:

- Rhode Island is one of 41 states that has an Early Childhood Teaching Certificate, License or Endorsement to ensure teachers of young children up through age 8 have the necessary knowledge of young children's development and learning and demonstrate strong teaching practices with young children. However, this teaching certificate is only required for teaching the preschool grades and Kindergarten (children ages 3-6). Rhode Island KIDS COUNT recommends the state move to requiring the Early Childhood teaching certificate for all teachers in 1st and 2nd grades. Young children learn differently than older children and specific skills and knowledge are needed to consistently and effectively teach children ages 3 through 8.
- Rhode Island KIDS COUNT recommends the state require that the Early Childhood Teaching Certificate include additional requirements:
 - o Complete RIDE-approved professional development in the Rhode Island Early Learning Standards (currently required for the RI Pre-K program and in the BrightStars Quality Rating and Improvement System),
 - o Complete coursework in science-based reading instruction, including the development of early language and pre-reading skills. We applaud the addition of coursework on reading instruction to the Grades 1-6 teaching certificate, but effective early language and literacy instruction does not begin in first grade. Similarly, effective instruction in ELA, math, science, and social studies does not begin in first grade and should be included in the early childhood teaching certificate's requirements.
- In 2016, the Rhode Island Early Learning Council recommended that the state increase the percentage of teachers of grades K-3 that have an early childhood teaching certificate, consider expanding the teaching certificate to include Grade 3, and consider requiring the teaching certificate for grades 1-2.
- 1.8.16 Endorsements: Rhode Island KIDS COUNT supports the creation and implementation of endorsements to build expertise in specific knowledge and practices. We recommend the establishment of an early childhood endorsement for building principals so they can effectively serve as an administrative and pedagogical leader with knowledge of specific teaching practices (including play-based learning strategies) that are effective with young children and building policies and practices that support high-quality early childhood teaching – such as family-style meals and snacks, supervision and support of toileting and diapering, and safe transportation practices.
- In 2016, the Rhode Island Early Learning Council recommended that the state develop an add-on certificate or endorsement for school administrators responsible for grades PK-3 so they have training in early childhood development and learning and ensure that early care and education content is integrated into the elementary principal certificate programs for new principals.

Here are some essential resources:

Education Commission of the States: A Policymakers Guide for Preschool – Grade 3

National Association of Elementary School Principals: A Vision for Transforming Education Across the Pre-K to Grade 3 Years

New America: One Size Does Not Fit All: The Need for Specialized Teacher Licenses in the Early Grades

National Governors Association: Leading for Early Success: Building School Principals' Capacity to Lead High-Quality Early Education

Encouraging the Development and Achievement of Dual Language Learners in Early Childhood

Thank you for considering these recommendations. Let us know if we can provide any additional information.