

Summary of Public Comment – RIDE’s Proposed Revisions to Certification Regulations Recommendations

Public Comment Period: January 10, 2025 to February 24, 2025

Introduction and Public Comment Process:

The Rhode Island Department of Elementary and Secondary Education, as approved by the Council on Elementary and Secondary Education is proposing changes to the Regulations Governing the Certification of Educators in Rhode Island (200-RICR—20-20-1).

At the Council's November 21, 2024, meeting, the Council formally approved the proposed regulations for the purpose of public review and comment per Rhode Island General Law § [42-35-2.8](#). This document details an overview of the comments provided organized by key topic areas.

The public comment period was open for 45-days (longer than the required 30-day period) from January 10, 2025 to February 24, 2025. RIDE made public comment possible via formal public hearings, mail, email, and an online form available during the public comment process.

Public Comment Hearings:

RIDE conducted four (4) public hearings during the public comment window. The public hearings were advertised via RIDE's field memo, website, and targeted emails. At these hearings, a summary document of the proposed regulations, as well as an infographic describing updates, and the regulations in their entirety were made available to attendees. Attendees were able to provide oral testimony at a podium, or written testimony by scanning a QR code to complete an online form. The public hearing dates and locations are listed below:

- **January 21, 2025** at Narragansett High School, 245 S Pier Rd, Narragansett, RI 02882
- **January 23, 2025** at Hugh Cole Elementary School, 50 Asylum Rd, Warren, RI 02903
- **January 29, 2025** at Providence Career and Technical Academy, 41 Fricker St, Providence, RI 02903
- **January 30, 2025** at Smithfield High School, 90 Pleasant View Ave, Smithfield, RI 02917



Summary of Received Public Comments:

RIDE received 568 comments in total. These submissions came from 122 individual commenters which includes five (5) commenters representing their respective organizations other than educator preparation. Among these 122 commenters, we heard from 76 commenters affiliated with local education agencies including educators as well as school and district leadership, six (6) different higher education institutions, five (5) professional organization, and 151 community members. Across four public comment sessions, nine (9) individuals provided spoken testimony; eight (8) individuals submitted written comments via email; and 106 submitted comment via google form responses. Thirty-eight (38) percent (209 of the 568) comments were from individuals affiliated with Warwick Public Schools.

Understanding the Document:

- The role/affiliation of individuals and groups that provided public comment can be found in the “Summary of Comment” column of the table below.
- Roles/affiliations were recorded based upon how individuals identified themselves.
- If an individual did *not specify their role/affiliation*, or if they *specified multiple roles/affiliations*, they are recorded as a “community member”

The suggested change to language or rationale for no change describes why RIDE did or did not make a change to the proposed regulatory revision based upon the public comment received. Categories for change rationale include:

- **"Suggested Change and Rationale"** meaning that RIDE made a revision to the final regulatory proposal based upon this public comment.
- **"No Change"** meaning that RIDE did not make a revision to the final regulatory proposal based upon this comment. The entry will include the rationale for why RIDE did not incorporate this revision in the final regulatory proposal. This rationale may be that the comment is unrelated to the proposed certification regulation changes, that the comment is related to implementation, or that the comment is applicable to the proposed changes to regulations, but RIDE has not made a change for a particular reason.



Topic 1: Rhode Island Professional Teaching Standards

Regulation Section and Page Numbers	Summary of Proposed Change	Summary of Comment	No Change or Suggested Change and Rationale
RIPTS 1.3.2 Clean Version Pages 7 – 12 Post-comment Redline Pages 8 -17	RIDE updated the RI Professional Teaching Standards to be more current as the last revision took place in 2007. RIDE elicited stakeholder feedback on the revised language from the fall of 2023 – fall of 2024. Stakeholder groups who provided feedback included the following: superintendents, assistant superintendents, principals, teachers, and educator preparation programs.	Commenters 45 supported: 33 Local Education Agencies (LEAs), 5 Institutes of Higher Education (IHEs), 6 Community, 1 Rhode Island Teachers of English Language Learners (RITELL) 5 opposed: 5 LEAs 54 neutral: 36 LEAs, 2 IHE, 16 community Forty-five (45) commenters indicated support in their responses. Some offered additional comments that included: there is an alignment with Council for the Accreditation of Educator Preparation (CAEP) standards, standards should be evaluated every 5-10 years, standards could be updated as the profession has evolved, explicit mention of Multilingual Learners was appreciated, and another comment was the standards “did not go far enough.” Five (5) commenters indicated opposed in their responses. A couple offered additional comments that included: the standards are vague, expansive, and unclear and another questioned the date of the last revision. Fifty-four (54) commenters indicated neutral in their responses. A few offered additional comments that included: current standards are adequate and rigorous, standards should be reviewed to ensure they are realistically achievable for the best learner outcome and another comment not related to the standards.	No Change RIDE maintains the proposed regulation language as no new feedback collected during the public comment period would necessitate edits to language included from the earlier engagements.

Topic 2: Praxis Pilot



Regulation Section and Page Numbers	Summary of Proposed Change	Summary of Comment	No Change or Suggested Change and Rationale
Content Testing 1.6. B.1.a Clean Version Pages 29- 30 Post-comment Redline Pages 34 - 35	RIDE proposed that by December 2026, RIDE would pilot at least one opportunity for educators who scored within one (1) Standard Error of Measurement on Praxis to demonstrate content proficiency. Language in the regulations state that the Council must review and approve the pilot design and requirements.	Comments: • 54 supported: 34 LEAs, 8 IHEs, 1 RITELL, 11 community • 31 opposed: 20 LEAs, 12 community • 17 neutral: 14 LEAs, 3 community • 1 amend: 1 community Fifty-four (54) commenters indicated support in their responses. Of the fourteen (14) who offered additional comments, half noted the importance of this option for those who do not test well; one supporter stipulated their support “if and only if the candidate is within 1 Standard Error of Measurement” (SEM); and a couple of commenters expressed strong support for Praxis flexibilities. One supporter commented that evidence of alternate means of proficiency should be the responsibility of the candidate and not an Educator Preparation Program or RIDE. Another stated that a portfolio of work or illustration of content knowledge through graduate work/degree and /or experience in the field should be considered. Two comments were not relevant to the Praxis Pilot. Thirty-one (31) commenters indicated opposed in their responses. Of the 31, 12 provided additional comments. Eight (8) commenters demonstrated a misconception that RIDE would be lowering the cut score or expectation of high standards for content knowledge. Four (4) other commenters offered an opposing rationale which included: if a candidate can’t pass the test they should study more; “being certified in content area should be from an approved college”; and a couple expressed that teaching exams are not relevant to teaching or certification. Seventeen (17) commenters indicated neutral in their response. A few offered additional comments with one commenter stating that tests do not tell the entire story of a person's capability. One commenter needed an outline of the alternative measure to weigh in and another was not related to the Praxis pilot.	No change RIDE agrees that high expectations for content knowledge is important for all teachers. The pilot does not lower expectations, rather it provides a supplemental measure of content under specific conditions. The Council will approve the pilot design once complete.



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Topic 3: Expanded Interstate Flexibility

Regulation Section and Page Numbers	Summary of Proposed Change	Summary of Comment	No Change or Suggested Change and Rationale
1.7.C Clean Version Pages 31-32 Post-comment Redline Pages 37 – 38	RIDE proposed adding additional states to our list of interstate flexibility states.	Comments: 3 supported: 1 IHE, 1 Rhode Island Education Collective (RIEC) representative, 1 public school educator Three (3) commenters expressed support for this expansion.	Suggested Change RIDE supports expansion and is recommending three additional states: The Commonwealth of Puerto Rico, the State of Illinois, and the State of Michigan. During the public comment period RIDE heard support for the expansion of the list of interstate flexibility states. Concurrently, Connecticut continued to conduct research to determine additional states who have certification requirements that align to Connecticut's and determined that three additional states listed above would be added. Since RI and Connecticut have, and continue to align on interstate flexibility, RIDE is comfortable adding these states to the original proposal as it is logical outgrowth from the public comment period.

Topic 4: Advanced Certificates

Regulation Section and Page Numbers	Summary of Proposed Change	Summary of Comment	No Change or Suggested Change and Rationale
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1.8.4.A.2.d.2 Clean Version Pages 40 - 42 Post-comment Redline Pages 47 - 48	RIDE increased the number of aspirational benchmarks one can attain to be eligible for an advanced certificate and educators who earn a master's degree in their certificate area within their renewal cycle can continue to renew their certificate as an advanced.	Comments: 2 amend: 2 LEAs Two (2) commenters indicated amend and stated that the ways to earn an advanced certificate are too narrow, and that people should be able to complete an aspirational benchmark off-cycle and still get an advanced certificate. The second commenter stated that if someone holds certification in a shortage area, they should be able to apply for an advanced certificate, which is a misunderstanding of the regulations.	No Change RIDE's proposed changes to expand options for attaining an aspirational benchmark supports some of the comments received. RIDE maintains language that states PLUs and aspirational benchmarks must be completed during the certification cycle.
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Topic 5: Rhode Island Alternate Route Program Standards

Regulation Section and Page Numbers	Summary of Proposed Change	Summary of Comment	No Change or Suggested Change and Rationale
1.8.8.A.4.b.2 Clean Version Pages 47-49 Post-comment Redline Pages 55 – 57	Changed to align GPA of 2.75 with undergraduate and graduate minimum admissions requirements for traditional preparation programs.	Comments: 1 support: 1 EPP One (1) commenter supported this change stating that this provides flexibility and access to the teaching profession for people perusing nontraditional pathways.	No change RIDE supports the alignment of admissions requirements across all educator preparation programs.

Topic 6: Expert Residency Preliminary Certificate

Regulation Section and Page Numbers	Summary of Proposed Change	Summary of Comment	No Change or Suggested Change and Rationale
1.8.11.3.a 1.8.11.3.d Clean Version Pages 53 - 56 Post-comment Redline	RIDE proposed a second expert residency pathway for middle and secondary content certification areas. Currently our regulations state that if a person holds a bachelor's degree in a like	Comments: 37 supports: 28 LEAs, 1 IHE, 7 community, 1 RITELL 59 oppose: 35 LEAs, 6 IHE, 18 community 9 neutral: 7 LEAs, 2 community Thirty-seven (37) commenters indicated support in their response. Five (5) offered additional comments including: the	Suggested Change RIDE maintains the change to language to allow a second pathway into middle and secondary areas for educators who hold any bachelor's and pass a content test as it streamlines entry into the profession and mirrors options in other states. Progression to full



Pages 61 - 65	or related area and passes the praxis, they may enter the field on what is called an expert residency certificate. The second pathway allows for a person to hold any bachelor's degree but will need to complete pedagogy course work and nine (9) credits in the content area to progress to full certification.	change would align with Massachusetts, a great support for someone seeking dual certification, this would help with shortage of special education teachers; and one should be eligible for an expert residency certificate if they have enough experience and content to pass the test. One commenter suggested adopting a school business administrator test. Fifty-nine (59) commenters indicated opposed in their responses with thirty-one (31) offering additional comments. Twenty-three (23) commenters showed evidence of misunderstanding the proposed regulatory language, interpreting it as indicating that educators would not need to take pedagogical and content courses to be fully certified. Seven (7) commenters offered additional comments, including educators should have a content major or equivalent as a pathway into the profession, our current regulations are sufficient, a request to maintain high standards as individuals must have major or equivalent, and there should be a minimum requirement for content. One (1) commenter stated that we should maintain the length of the expert residency as one year, rather than extend it. Nine (9) commenters indicated neutral in their response and none provided relevant rationale.	certification for this pathway requires at least nine (9) content credits, if not already completed, and pedagogy course work. RIDE is suggesting changes to the length of the certification from the original proposal of four (4) years to issue initially for two (2) years and the option of two (2) renewals with a duration of two (2) years each. RIDE is maintaining language of degree and experience in school operations for the School Business Administration and will add new language to open the expert residency pathway to those who either meet the experience or the appropriate bachelor's degree.
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Topic 7: International Teacher Preliminary Certificate

Regulation Section and Page Numbers	Summary of Proposed Change	Summary of Comment	No Change or Suggested Change and Rationale
1.8.12 Clean Version Pages 57 - 58 Post-comment Redline	This is a new certificate meant to formalize a process for teachers working under J1, H1B or H1B1 visas.	Comments: 3 supports: 1 RI Kids Count, 1 International Teacher Project, 1 RIEC RIDE received three (3) comments related to this new certificate area. All three of them strongly support the new certificate, but	No change RIDE supports formalizing the process for districts hiring international teachers.



Pages 67 - 68		one asked for eligibility to be expanded to any visa holder or permanent resident of the United States.	RIDE supports the current certification process which allows permanent residents living in the United States to become certified.
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Topic 8: Fast-Track Principal Preliminary Certificate

Regulation Section and Page Numbers	Summary of Proposed Change	Summary of Comment	No Change or Suggested Change and Rationale
1.8.13 Clean Version Pages 58 - 59 Post-comment Redline Pages 68 - 69	RIDE collapsed the two fast-track certificates into one to make it less confusing for the field.	Comments: 1 support: 1 RIASP The one (1) commenter supported this and encourages more educators to become leaders.	No change RIDE maintains the change to language as RIDE believes this will lessen the confusion surrounding the requirements of this certificate for the field.

Topic 9: Registered Apprenticeship Preliminary Certificate

Regulation Section and Page Numbers	Summary of Proposed Change	Summary of Comment	No Change or Suggested Change and Rationale
1.8.14 Clean Version Pages 59 Post-comment Redline Page 70-71	This is a new certificate allowing candidates in a RIDE recognized Registered Apprenticeship program to work as part of the program.	Comments: 1 opposed: 1 IHE One (1) preparation program professor stated that he is apprehensive about the move toward apprenticeship, but did not provide a rationale.	No change RIDE maintains the creation of this certification as this is an additional pathway into the teaching profession.

Topic 10: Endorsements

Regulation Section and Page Numbers	Summary of Proposed Change	Summary of Comment	No Change or Suggested Change and Rationale
1.8.17 Clean Version Page 61-62	Added language that states, "Endorsements are not equivalent to teaching certificates and do not qualify an	Comments: 1 neutral: 1 community 1 opposed: 1 RITELL	No change RIDE maintains proposed language to clarify the role of endorsements.



Post-comment Redline Pages 73 – 74	individual for an assignment as a teacher-of-record in a public school.”	One (1) commenter indicated opposed in their response and provided additional comments stating there is conflicting language between MLL regulations and certification regulations. As stated in certification regulations, endorsements are not equivalent to teaching certificates. One (1) commenter indicated neutral in their response and provided additional comments stating that the old middle grades endorsement is a full teaching certificate.	
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Topic 11: MLL Integrated Content Teacher Certificate

Regulation Section and Page numbers	Summary of Proposed Change	Summary of Comment	No Change or Suggested Change and Rationale
1.9.1.C; 1.9.2.C; 1.9.3.G; 1.9.4.L; 1.9.5.T Clean Version Page 65-66 (EC) Page 69-70 (EG) Pages 63-84 (MG) Pages 102 (SG) Pages 122 – 123 (All Grades) Post-comment Redline Page 78-79 (EC) Pages 83 – 84 (EG) Pages 101 - 102 (MG) Pages 127 - 128 (SG) Pages 155 (All Grades)	This is a new certificate that can be added in any grade span to show knowledge and skills to support MLLs within an educator’s content area. It does not allow someone to teach dedicated English Language Development.	Comments: • 1 Support: 1 IHE • 1 Oppose: 1 RI Kids Count One (1) commenter indicated support in their response and provided additional comment stating that MLL changes are excellent. One (1) commenter indicated opposed in their response and provided additional comments. They expressed concern with this becoming required for all teachers. They do not think this is necessary because RIDE offers TESOL and BDL certificates and they feel this new certificate “adds unnecessary bureaucracy and could dilute teacher preparation by allowing educators without formal ESOL training to take on multilingual learner instruction.”	No change RIDE maintains the proposed language as this certificate will not allow holders to teach dedicated English Language Development. It is one of the ways an individual can demonstrate proficiency to teach integrated content as defined in the MLL regulations. Educators have multiple options to meet the proficiency requirement.

Topic 12: Grade Spans

Regulation Section and Page Numbers	Summary of Proposed Change	Summary of Comment	No Change or Suggested Change and Rationale
1.9.1; 1.9.2; 1.9.4 Clean Version Pages 63-67 (EC) Pages 67-71 (EG) Pages - 86-103 (SG) Post-comment Redline Pages 75- 80 (EC) Pages 80 - 85 (EG) Pages 103-129 (SG)	Expanding early childhood from PK– 2 to PK – 3; Expanding elementary from Grades 1-6 to K-6; Expanding secondary from 7 – 12 to 6 – 12. Expanding Special Education Early Childhood from B –2 to B – 3; Expanding Elementary Special Education from 1 – 6 to K – 8; Expanding Secondary Special Education from 7 – 12 to 6 – 12.	Comments: 65 supports: 1 private school, 1 RI Kids Count, 1 RITELL, 46 LEAs, 16 community 20 opposed: 11 LEAs (91% Warwick), 2 IHEs, 7 community 20 Neutral: 15 LEAs (67% Warwick), one (1) IHE, four (4) Community 7 Amend: two (2) LEAs, four (4) IHEs, one (1) Kids Count Sixty-five (65) commenters indicated support in their response with eighteen (18) of them offering additional comments. One (1) person supported the change but noted that elementary special education should match regular education grade spans in all certification areas. Another commenter supported but suggested adding 5th grade to the secondary certificate. Eleven (11) people stated that this change would provide more flexibility for educators to teach additional grades and for LEAs to fill shortage positions. One (1) person expressed support for changing elementary and secondary grade spans generically and One (1) person stated they support early childhood including grade 3 as it aligns with national standards. Three (3) of the comments were not relevant to grade spans and mentioned that there wasn't much change, one shouldn't need middle grades certification to teach middle grades, and one mentioned how current certificates would renew into the revised grade span. Twenty (20) commenters indicated opposed in their response. Of the twenty (20), ten (10) provided relevant feedback. Two (2) of these comments opposed adding kindergarten to the elementary grade span. One (1) requested that secondary include grade 5. One (1) person supported the change to 6-12 for secondary if it required additional coursework. Another commenter stated they wouldn't feel comfortable teaching grade 3 with their early childhood certificate and another stated that early childhood should be birth through age 8. One (1) commenter stated that "facilitating a wide range of age groups is not a smart decision." Two (2) people questioned the overlap of elementary and	No Change RIDE maintains the proposed language for grade spans. The proposed early childhood grade span aligns with the National Association for the Education of Young Children's definition and the inclusion of grade three (3) will allow more flexibility and opportunity for early childhood educators within districts. While there was some opposition to the inclusion of kindergarten within the elementary grade span, RIDE believes that the academic standards for kindergarten warrant inclusion within the elementary certificate grade span. Additionally, there was substantial support from LEAs and teachers who stated this would provide flexibility. With respect to adding grade 6 to the secondary grade span, RIDE believes this will benefit secondary educators, who have strong content and pedagogical knowledge, because they will no longer need to pursue additional coursework or pay for an additional certificate to teach one additional grade level. It would also address the struggles LEAs currently have regarding shortages in middle grades positions. The proposed special education grade spans provide opportunities for LEAs to staff the shortage area of special education with qualified certified educators.



secondary grade spans to both include grade 6 and one (1) commenter opposed the overlap of K-8 and 6-12 for special educators. Two (2) people demonstrated misconceptions about the proposed change. One person's comment was related to the new Health/Physical Education/Adaptive Physical Education certificate and the other questioned how the structure of school buildings would need to be changed to match the proposed grade spans.

Twenty (20) commenters indicated neutral in their response and five (5) offered additional feedback. One (1) person requested adding grade 5 to the secondary grade span. Another commenter stated that they believe early childhood should remain PK-2 and secondary should stay 7-12 but that they support the other changes. Another person supports including Kindergarten in the elementary grade span as well as including grade 6 in the secondary special education grade span but believes the elementary special education grade span should be K-5. One (1) person believes teachers would need additional professional learning to understand the additional grade levels and another stated that grade levels should be aligned with childhood development. One (1) person demonstrated a misconception regarding a person's eligibility to teach 6th grade in a middle school.

Seven (7) commenters indicated amend in their response. Two (2) of them requested grade 5 to be added to the secondary grade span and one (1) stated grade 5 should be added to the secondary special education grade span and that elementary special education should include PK. Three (3) commenters do not want grade 3 in early childhood or kindergarten in elementary because it may make early childhood less desirable as a certificate area and one of them supported the addition of grade 3 to early childhood because it aligns to National Association for the Education of Young Children's (NAEYC) definition of early childhood. One (1) commenter disagreed with the addition of grade 6 to the secondary grade span because it lumps 11- and 12- year-olds together and they believe them to be developmentally different.



Topic 13: Experienced Teachers Adding Additional Certificates

Regulation Section and Page Numbers	Summary of Proposed Change	Summary of Comment	No Change or Suggested Change and Rationale
1.9.1; 1.9.2; 1.9.3; 1.9.4; 1.9.5 Clean Version Pages 63 – 64 (EC) Pages 67-68 (EG) Pages 71-82 (MG) Pages 86-101 (SG) excluding CTE Pages 104-117 (All G) excluding SNT Post-comment Redline Pages 75 - 76 (EC) Pages 80 - 82 (EG) Pages 85 - 99 (MG) Pages 103-126 excluding CTE (SG) Pages 129-148 (All G) excluding SNT	Educators with three (3) years of successful experience teaching in Rhode Island would be eligible to add an additional certificate area by passing the appropriate content test.	Comments: 69 support: 48 LEAs, 4 IHEs, 1 private school, 1 RIEC, 15 community 23 oppose: 15 LEAs, 4 IHEs, 4 community 14 neutral: 6 LEAs, 1 IHE, 1 RITELL, 6 community 2 amend: 1 IHE, 1 community Of the Sixty-nine (69) people who indicated support for these changes, sixteen (16) offered additional comments. Four (4) people stated that this is appropriate for educators who have been trained and are currently working in the field. Another commenter indicated this would widen the pool of educators for staffing and increase flexibility for educators. An additional commenter stated that this is a way to “honor someone’s experience and tenure but still verify that someone has the credentials and knowledge they need to be certified.” Two other commenters expressed that this would open doors and widen the scope of what teachers can do without “forcing [them] back to school.” Another person commented that it is difficult for educators to add a new certificate. One (1) individual stated that this would help them get the certificate they want because the course they need is not offered in-state. Another comment simply stated, “please do this,” and another expressed “strong support” for this change. One (1) person claimed this is “how it used to be.” One supporter suggested a coursework only option and another encouraged this change but felt three (3) years isn’t enough time for someone to be experienced enough. One commenter supported special educators adding additional grade spans if they complete a residency at the other grade span. One (1) person provided a comment that is unrelated to this proposed regulation, stating that	Suggested Change RIDE recommends modifying the proposed regulations to allow experienced educators to add an additional certification by passing the required content test. Most of the comments supported this change citing that it provides flexibility and honors the experience of educators; however, based on the comments received, RIDE recommends the following changes: RIDE recommends changing the number of years of experience required from three (3) years to four (4) years for all educators. This will continue to honor educators’ experience while also ensuring they are no longer novice teachers. RIDE also recommends that elementary teachers wishing to add a middle grades certificate have experience teaching in grades 5 and 6 to ensure understanding of childhood development at that grade span. RIDE recommends eliminating allowing the test in options for experienced special educators. The comments RIDE received regarding testing into special education areas and the vulnerable population of students served by special educators sufficiently convinced RIDE that special education should not be included in the currently proposed certification regulation changes.



		Calculus should not be a required course for a middle grades math educator. Twenty-three (23) people opposed. One (1) person stated that if someone has passed the special education test, they shouldn't have to take another test, and another person opposed the idea of testing into Severe Intellectual Disability certification. Another person stated that an exam doesn't show one's ability to work in a classroom. One (1) commenter opposed this because they believe it to be recycling teachers rather than recruiting new ones into the profession. Another comment spoke to three (3) years of experience not being enough while another person stated that we need teachers "who are thoroughly prepared for the profession." Six (6) comments cited the need for coursework and targeted practice rather than just a test. Of the fourteen (14) commenters who indicated they were neutral, two (2) offered additional comments. One (1) stated they would support only if a person completed practicum and student teaching and the other asked if it would apply to TESOL. Two (2) people indicated amend in their responses and both provided additional comments. One (1) stated it is easier to move between subjects than to move up and down developmental stages and recommended adjacent grade spans not be included in this. The other person supported but wanted to reduce the number of years of experience from three (3) to one (1) or two (2).	RIDE is proposing changes to the test in option for experienced educators holding an All Grades certificate who wish to test into Early Childhood and Elementary grades. Both pathways require the educator to have four (4) years of experience teaching at the new grade level and they must complete twelve (12) credits in the teaching of early childhood development and the teaching of: English Language Arts, Mathematics, Science, and Social Studies, respectively. This change is, in part, based on the comments regarding the need for additional coursework. All Grades teachers are prepared to teach single subjects, so RIDE feels that additional coursework in content pedagogy is necessary.
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Topic 14: World Language Teacher Certificate

Regulation Section and Page Numbers	Summary of Proposed Change	Summary of Comment	No Change or Suggested Change and Rationale
1.9.5.M.2.c Clean Version Pages 116-117 Post-comment Redline	An Educator Preparation Program may waive up to eighteen (18) credits in a language for native speakers.	Comments: 1 amend: RI Kids Count One (1) commenter requested to expand the credit waiver for native speakers of a language.	No change RIDE lists specific coursework that native speakers must complete to be prepared to teach the language, including Linguistics, Culture, and



Pages 147-148			Literature. A waiver does not assess linguistics or culture/literature.
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Topic 15: District-Level Administrator: MLL

Regulation Section and Page Numbers	Summary of Proposed Change	Summary of Comment	No Change or Suggested Change and Rationale
1.10.2.C Clean Version Pages 125 - 126 Post-comment Redline Pages 160 - 161	This is a new certificate for MLL Director that mirrors the District Level Administrator: Special Education Certificate.	Comments: 1 support: 1 RI Kids Count One (1) commenter indicated support in their response and offered additional comment which stated that “RI must go beyond just creating this certification. There must be active recruitment efforts, including outreach, financial assistance and mentorship programs.”	Suggested change RIDE proposes two supervision courses to ensure preparedness to serve in this leadership role which addresses one (1) commenter’s statement requesting support and mentorship. The changed language includes coursework in the following: Supervision of ESOL programs, Supervision and Evaluation of Professional Staff. This aligns with the District Level Administrator: Special Education, which is similar in structure.

Topic 16: School Business Administrator Certificate

Regulation Section and Page Numbers	Summary of Proposed Change	Summary of Comment	No Change or Suggested Change and Rationale
1.10.2.D Clean Version Page 126 Post-comment Redline Page 161	RIDE added an option to hold a bachelor’s degree in any area with coursework in accounting, finance, and management, including credits in marketing, law, human resources, school finance, school plant planning, or information systems.	Comments: 1 neutral: RIASP There was a comment requesting more flexibility to earn this certificate.	Suggested Change RIDE proposes an additional pathway to full certification via any language bachelor’s degree with specific content coursework.



Topic 17: Removal of English as a Second Language Specialist/Consultant Certificate

Regulation Section and Page Numbers	Summary of Proposed Change	Summary of Comment	No Change or Suggested Change and Rationale
1.11 Clean Version English as a Second Language Specialist/Consultant has been removed from this section. Post-comment Redline Page 165	Remove English as a Second Language Specialist/Consultant Certificate from Support Professionals.	Comments: 1 oppose: Rhode Island Teachers of English Language Learners (RITELL) One (1) commenter opposed the removal of this certificate because many educators who currently hold the certificate are in positions as coordinators or coaches and they feel it's a valid representation of their expertise.	No change RIDE will continue to renew this certificate for educators who currently hold it.

Topic 18: Regulatory Changes with No Comment Submissions

Regulation Section and Page Numbers	Proposed Changes with No Comment Submissions	No Change or Suggested Change and Rationale
1.2.A.27 Clean Version Page 4 Post-comment Redline Page 4	Interstate flexibility definition	No change
1.7.E Clean Version Page 35 Post-comment Redline Pages 41-42	Performance review pilot	
1.3.4 Clean Version Pages 24 Post-comment Redline	Code of Professional Conduct	



Pages 29 1.14 Clean Version Pages 132-133 Post-comment Redline Pages 170-171	Reinstatement	
1.8.9.D Clean Version Pages 50-51 Post-comment Redline Pages 58-59	Career and technical education	
1.9.5.F Clean Version Pages 108-109 Post-comment Redline Pages 136-137	The addition of a combined health/physical education/adaptive physical education certificate	
1.8.15 Clean Version Page 113 Post-comment Redline Pages 142-143		
1.8.12 Clean Version Has been removed from regulations Post-comment Redline Pages 65-67	The addition of a school nurse teacher preliminary certificate	
1.8.15 Clean Version Has been removed	The removal of expert residency shortages preliminary certificate	



from the regulations Post-comment Redline Pages 72-73 1.11.1 Clean Version Has been removed from the regulations Post-comment Redline Pages 162-163	The removal of visiting lecturer preliminary certificate The removal of the instructional leader support professional certificate	
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Topic 19: Comments Unrelated to Proposed Regulatory Changes

Summary of Comment	No Change or Suggested Change and Rationale
RIDE received the following comments unrelated to our proposed regulatory changes: • Suggestion to add required coursework in Special Education for all teachers and administrators as well as make professional learning in Special Education mandatory. • A Reading Specialist should be able to teach ESOL. • Time spent as a substitute teacher should count toward student teaching. • College courses should be free for teachers. • We need to take efforts to “close the emergency ‘backdoor.’” • Bilingual/Dual Language content tests should be taken in native languages. • Question about why elementary special educators need to pass the elementary content tests and the special ed test while secondary special educators only need to pass the special ed test.	No Change RIDE cannot make additional changes that were not available for public review and comment. Some comments are not relevant to certification regulations.

