

**Rhode Island Association of School Business Officials**  
**Building # 6, Rhode Island College Campus**  
**600 Mount Pleasant Avenue**  
**Providence, RI 02908**

**President**

Lori A. Miller

October 11, 2011

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**President-Elect**

Sarah E. Mangiarelli

Rhode Island Board of Regents  
c/o Rhode Island Department of Education  
255 Westminster Street  
Providence, RI 02903

**First Vice President**

Maryann Crawford

Dear Members of the Board of Regents:

**Second Vice President**

Cynthia S. Brown

I am writing on behalf of the Rhode Island Association of School Business Officials (RIASBO) to offer written comment regarding the proposed changes to the Rhode Island Department of Education's certification regulations. RIASBO is a professional organization whose members are primarily chief school business officials in Rhode Island School Districts with a mission statement that includes ongoing professional development and advancement.

**Secretary**

Lisa Cournoyer

Members of RIASBO are supportive of the continuation of certification requirements for school business officials to ensure that members are qualified to hold this important position in order to fulfill the financial and operational responsibilities for their respective districts. There are a few areas of concern that we would like to highlight for proposed inclusion in the revised regulations. They are:

**Corresponding Secretary**

Robin Reazor

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**Assistant Treasurer**

Melissa Devine

1. School Business Officials hired before the existing regulations went into effect in 2001 are currently grandfathered as business administrators in the district where they currently work. If a grandfathered individual accepts employment in another district, the grandfathering right no longer applies, and the individual must obtain certification in order to work in the new district, state school or charter school. We believe that this grandfathering provision should carry forward to the new certification regulations.
2. Every chief school business official should be subject to the proposed regulations. RIASBO believes that every district, state school and charter school must employ one certified business official. Although there are size differences among school districts, state schools and charter schools, the work, reporting requirements, accounting laws and regulations, etc. are the same. Therefore, it is our belief that every chief school business official, whether a district, state school or charter school, must be subject to the proposed regulations.

**Members At Large**

Michael D'Antuono  
Steven Janelle  
John Ritchotte  
Pauline Silva

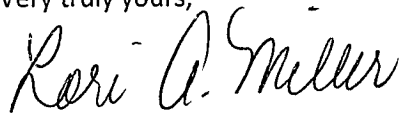
**Executive Director**

Jane F. Correia

3. The new regulations provide that an approved program be part of the professional certification requirements. Currently there is no approved program in Rhode Island. Given the nature of the daily work of the school business official and, in particular, the UCOA requirements, we believe that a strong background in accounting is essential. We recommend that the current requirements of a bachelors degree or an advanced degree in business administration from an accredited or approved institution as defined in these regulations or a bachelor's degree in another area with a minimum of twelve (12) credits in accounting remain. Those individuals currently holding a valid Certified Public Accountant (CPA) license or an MBA from an accredited college or university are eligible for this certificate regardless of the area or specification for the Bachelor's Degree.
4. As is the case with most professions, ongoing, meaningful professional development is a paramount concern for school business officials. Each year accounting rules change and school business officials must be aware of these changes to effectively implement them. We believe that an ongoing professional development program must be part of the certification requirements for school business officials. We recommend that the regulations require a minimum of five (5) credits each year, with the detail of these professional development requirements to be worked out between RIASBO and the RIDE certification office.
5. Finally, the inclusion of the Chief School Financial Officer should be required in RIDE's PAP Report along with the other school administrators. Including the chief school financial officer will support RIDE's ultimate goal that every person be highly qualified in their respective positions. More importantly it will aid RIDE in identifying an individual's certification status and allow RIDE to enforce the certification regulations for the chief school business official in every district, state school and charter school.

RIASBO stands ready and willing and able to assist RIDE in implementing our recommendations. Please do not hesitate to contact me if you require additional information, have questions or need our technical assistance.

Very truly yours,



Lori A. Miller  
President, RI Association of School Business Officials