January 26, 2023

Dear Christina Coughlin, Board of Regents, and Commissioner Rosa,

This letter is being submitted as a public comment regarding the proposed rulemaking for Indigenous Names, Mascots, and Logos I.D. No. EDU-52-22-00009-P.

We are requesting additional information on the enforcement of the resolution, clarity regarding the removal of previous logos, and consideration of lengthening the timeline or delaying the resolution until clarity is provided.

One significant concern is the following mandate. "Additionally, public schools must prohibit school officers, employees, and all individuals when located on school property or at a school function from utilizing or promoting any Indigenous name, logo, or mascot (this provision does not apply to any individual who is a member of a tribal nation)". We cannot require staff (nor have the resources) to safely police all visitors' personal belongings. Please clarify the parameters of this section.

Another concern is a lack of clarity and length to which the removal of names and logos from being "displayed" is required. For example, must past photographs, trophies, banners, and road signs honoring past champions all be removed? Our past successes and accomplishments are important to celebrate and to encourage future aspirations and can be done alongside retiring and transitioning to a new mascot. **Please provide additional information.**

We ask for clarification on these mandates and corresponding compliance schedules i.e full implementation by the end of 2024-2025. The current timeline does not address the financial considerations required to follow the regulation as well as educational opportunities that may be missed both inside and outside the school community if we are forced to complete this change in the current proposed timeline. Please consider extending the timeline to fully implement the changes to reduce this quick change and financial strain.

This is a powerful teaching moment, and we feel that acknowledging the past while honoring school history and community provides an important context for a deliberate mascot transition and is the intent of this proposed rule.

Thank you for consideration of these comments,

Hoosic Valley Board of Education Schaghticoke, NY