



March 30, 2026

The Honorable Joseph McNamara
82 Smith Street
Providence, RI 02903

RE: Opposition to Rhode Island HB7895 – Safe School Technology Act of 2026

Dear Chair McNamara and Members of the House Education Committee,

On behalf of the Software and Information Industry Association (SIIA), I am writing to express our strong opposition to **Rhode Island HB7895**, the Safe School Technology Act of 2026. SIIA is the principal trade association for the software and digital information industries, representing nearly 400 companies that develop and deliver educational software, digital instructional content, and online learning services to millions of learners nationwide.

While we share the legislature's commitment to student safety, privacy, and well-being, HB7895 proposes an overly restrictive regulatory framework that will severely disrupt classroom instruction, impose massive unfunded administrative burdens on local schools, and deprive Rhode Island students of critical, evidence-based learning tools. If enacted, Rhode Island would become one of the most restrictive states in the nation for educational technology.

We urge the committee to consider the following critical concerns regarding this legislation:

Burdensome "Pre-Market Approval" and the Erosion of Local Control The "Ensuring Safe School Software Act" provision in the bill requires all ed tech companies to register annually with the Rhode Island Attorney General, pay a registration fee, and submit to third-party compliance verifications. This effectively establishes a rigid pre-market approval system that shifts vetting authority away from the expert, local educators and school districts who understand their students best, and places it in the hands of a state administrative office. This will severely delay the rollout of vital educational tools, driving up operational costs and potentially forcing vendors to exit the Rhode Island market entirely.

Bans on "Personalized Recommendations" Harm Struggling Learners HB7895 explicitly prohibits the use of "personalized recommendation systems" and "generative or conversational AI" in certified instructional technology. Prohibiting personalization effectively bans the adaptive learning platforms that are expressly designed to help struggling learners catch up. When intentionally integrated, data-driven educational tools accelerate student achievement.

- A landmark **RAND Corporation study**¹ found that blended learning models can effectively double typical annual learning gains for students in subjects like Algebra.

¹ John F. Pane et al., *Does an Algebra Course with Tutoring Software Improve Student Learning?* (Santa Monica, CA: RAND Corporation, 2013), <https://doi.org/10.7249/RB9746>.

- Research from **SRI International**² demonstrated that providing students with immediate, personalized digital feedback on homework resulted in 75% more learning compared to traditional methods and successfully closed achievement gaps.

Vague Standards and Legal Uncertainty The bill also prohibits "addictive design features". This is a highly subjective and undefined standard in the context of educational technology. It is unclear whether standard educational engagement tools—like progress bars, badges, or simple gamification meant to keep students motivated—would be banned under this vague criteria. This overbreadth invites extensive litigation and creates immense legal uncertainty for both regulators and technology providers.

Unworkable Mandates and Administrative Burdens for Teachers Under the bill's "Right to Opt-Out" provisions, schools are mandated to provide "equivalent non-digital resources" to any student whose caregiver opts them out of using school-issued devices or online standardized testing. This places an impossible administrative workload on teachers, who would have to create parallel, analog lesson plans and testing structures for individual students. Furthermore, modern ed tech acts as a force multiplier for teachers; according to the **2025 HMH Educator Confidence Report**³, 68% of U.S. educators report that ed tech saves them an average of five hours per week on administrative tasks. Stripping these tools from the classroom will exacerbate teacher burnout.

Every student deserves access to a modern, dynamic, and safe education. However, creating sweeping state-level bans, ambiguous design standards, and burdensome registries will fundamentally disadvantage Rhode Island's schools, teachers, and students.

We respectfully urge you to **oppose** HB7895 and instead focus on empowering local districts with the resources they need to safely and effectively integrate technology. We welcome the opportunity to share our expertise with the committee to ensure technology remains a bridge to learning in Rhode Island.

Sincerely,

Abigail Wilson
Director of State Policy
Software & Information Industry Association

² Jeremy Roschelle et al., "Online Mathematics Homework Increases Student Achievement," *AERA Open* 2, no. 4 (October–December 2016): 1–12, <https://doi.org/10.1177/2332858416673968>.

³ Houghton Mifflin Harcourt, *2025 Educator Confidence Report* (Boston: HMH Education Company, 2025), <https://www.hmhco.com/educator-confidence-report>.

