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March 13, 2026

The Honorable Hanna M. Gallo, Chair  
Senate Committee on Education  
State House  
82 Smith St.  
Providence, RI 02903

**RE: S 2782 – An Act Relating to Education - School and Youth Programs Concussion Act**

Dear Chair Gallo:

Please accept this letter regarding S 2782, legislation that would repeal [R.I. Gen. Law 16-91](#), the *School and Youth Programs Concussion Act*. It would also replace the existing statute by requiring school districts to organize concussion oversight teams; develop removal-from-play, return-to-play, and return-to-learn protocols; and develop a concussion brochure. This act would take effect on July 1, 2026.

S 2782 seeks to replace the current *School and Youth Programs Concussion Act*, which provides the Rhode Island Department of Health (RIDOH) with the authority to collaborate with the Rhode Island Department of Education (RIDE) and with the Rhode Island Interscholastic League (RIIL). The proposed legislation removes this collaboration and no longer requires RIDE to post concussion training materials for key staff on its website. It also removes the requirement for coaches and school nurses to complete concussion training and annual refresher courses. In addition, the bill no longer encourages teachers to complete concussion training and removes language encouraging baseline testing for student athletes.

The RIDOH's Violence and Injury Prevention Program has administered both the Administration for Community Living (ACL) Traumatic Brain Injury (TBI) Partnership Grant for eight years and the Centers for Disease Control and Prevention (CDC) Core State Injury Prevention Program Grant for over 15 years. Both grants support TBI prevention and the development of TBI systems, ensuring that Rhode Island implements initiatives that promote TBI prevention and provides resources to those affected.

Each year, RIDOH provides schools with reminders about return-to-learn protocols, training opportunities, and free impact testing. RIDOH also leverages the School and Youth Programs Concussion Act to remind key staff of the importance of participating in training and testing. Without this legislative framework, there may be a reduced incentive for school staff to prioritize these efforts. RIDOH would also like to be able to continue to work with RIDE to ensure that they have access to best practices and technical assistance from our national partners. It is extremely important for RIDOH to maintain legislation that requires collaboration among

agencies and that clearly establishes the need for concussion training and annual refreshers for key school personnel.

Thank you for the opportunity to comment on the proposed legislation.

Sincerely,

A handwritten signature in black ink that reads "Jerome M. Larkin". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Jerome M. Larkin, MD  
Director

CC: The Honorable Members of the Senate Committee on Education  
The Honorable Walter S. Felag, Jr.  
Kristen Silvia, Director of Legislation and Deputy Chief of Staff  
Patricia Resende, Director of Senate Policy