

March 23, 2012

Susan Haberstroh, Education Associate
Regulation Review
Department of Education
401 Federal Street, Suite 2
Dover, DE 19901

RE: DOE Proposed Specialist Appraisal Process Regulation [15 DE Reg. 1254 (3.1.12)]

Dear Ms. Haberstroh:

The Governor's Advisory Council for Exceptional Citizens (GACEC) has reviewed the Department of Education proposal to amend the standards covering specialist appraisal. The GACEC **endorses** the proposed regulation; however, we would like to reiterate observations submitted by the GACEC in October.

Council understands that the regulation includes an exemption from counting "student improvement" in the assessment of a specialist in the 2011-12 school year (§5.2). The rating of "highly effective" is not available to specialists for the 2011-12 school year (§6.2.1.1). Specialists qualify for an "effective" rating by earning a satisfactory rating in four appraisal components apart from student improvement (§6.2.2.3). A specialist qualifies for a "needs improvement" rating based on a satisfactory rating in 2 of 4 appraisal components apart from student improvement (§6.2.3.3). A specialist qualifies for an "ineffective" rating based on a satisfactory rating in 0-1 of the 4 appraisal components apart from student performance (§6.2.4.3). An improvement plan is available based on unsatisfactory ratings (§§8.1-8.2).

Council would like to reiterate that the categories seem overly generous and euphemistic by characterizing a specialist with a satisfactory rating in 2 of 4 contexts as "needs improvement" and a satisfactory rating in 0 or 1 context as "ineffective".

Please feel free to contact me or Wendy Strauss should you have questions in regard to our comments.

Sincerely,

Robert D. Overmiller
Past Chairperson

RDO:kpc