

November 14, 2012

Charles Michels, Executive Director
Delaware Professional Standards Board
John G. Townsend Building
401 Federal Street
Dover, DE 19901

RE: DOE Proposed Teacher of Students Who Are Deaf or Hard of Hearing Certification Regulation [Pre-publication Draft]

Dear Mr. Michels:

The Governor's Advisory Council for Exceptional Citizens (GACEC) has reviewed the pre-publication draft of the DOE Proposed Teacher of Students Who Are Deaf or Hard of Hearing Certification, which was forwarded to us by the Director of Statewide Programs for the Deaf, Hard of Hearing and Deaf-Blind on October 31, 2012. Similar to raising standards for interpreters, this regulation raises standards for people who are employed to teach students who are deaf or hard of hearing.

Council would like to share the following observations.

First, the template for the regulation matches that of the recent regulations proposed by the Professional Standards Board and DOE. Compare proposed Teacher of Students with Autism or Severe Disabilities, 16 DE Reg. 489 (November 1, 2012). However, there is one major difference. Other regulations contain a "grandfather" provision. See, e.g., 16 DE Reg. 489, 493, §5.0 (Past Certification Recognized). The draft regulation does not contain a "grandfather" provision. Rather, §1.0 requires compliance with the new standards within eighteen months:

Eighteen (18) months from the effective date of this regulation, this certification shall be required for all educators within the Delaware public school system whose primary assignment is teaching children who are deaf or hard of hearing.

Providing only 18 months to complete the required twenty-one (21) credits (§4.2) is clearly too short a period. Council recommends a longer time period to complete the necessary coursework.

Second, Council questions whether three (3) credits in American Sign Language (ASL) (§4.2.8)

is sufficient to provide proficiency for middle and high school level instruction in which complicated subjects such as Algebra or Calculus are addressed.

Thank you in advance for your consideration of our comments and observations. Please feel free to contact me or Wendy Strauss should you have any questions.

Sincerely,

Terri A Hancharick
Chairperson

TAH:kpc

CC: The Honorable Mark Murphy, Secretary of Education
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