

May 15, 2014

Dr. Donna Mitchell, Executive Director
Professional Standards Board
Townsend Building
401 Federal Street
Dover, DE 19901

RE: Professional Standards Board Proposed Educational Technology Standards Regulation [17 DE Reg. 1032 (May 1, 2014)]

Dear Dr. Mitchell:

The Governor's Advisory Council for Exceptional Citizens (GACEC) reviewed the Professional Standards Board proposal, in conjunction with the Department of Education (DOE), to adopt a set of national technology standards for all Delaware educators. The National Educational Technology Standards (NETS) are incorporated by reference into the regulation. The GACEC would like to share the following observations.

First, although §1.2 reflects the intent of the Department of Education that the standards will apply to "all Delaware educators", the balance of the regulation only covers administrators (§2.0) and teachers (§3.0). This is inconsistent and unusual. School library media specialists regulated by 14 DE Reg. 1580; paraprofessionals regulated by 14 DE Reg. 1517; and school psychologists regulated by 14 DE Reg. 1583 are all omitted.

Second, §1.3 recites that "(a) summary of the standards is set forth within". This wording is also unusual. Consider substituting "within this regulation".

Third, §2.1 is not a sentence. It lacks a predicate. The Delaware Administrative Code Style Manual, §6.2.3, requires parallel form within regulations. Sections 2.2 - 2.6 have headings followed by sentences.

Fourth, §§2.2.1.1, 2.2.1.2, and 2.1.1.3 lack a subject. Consider adding "Educational Administrators fulfill the following functions:" in §2.2.1 after the word and punctuation

“organization.” Punctuation should also be added to §§2.2.1.1, 2.2.1.2, and 2.1.1.3.

Fifth, the heading to §2.0 refers to “leaders” while the text of the section refers to “school administrators” and “leaders”. For consistency, the heading to §2.0 could be amended to read “...Leaders and Educational Administrators”. Since “educational administrators” is not a term used in other DOE regulations, it would also benefit from a definition. The Delaware Administrative Code Style Manual, §6.2.2, encourages the use of consistent references. The term “school administrators” in §2.1 could be revised to read “educational administrators” for consistency with §§2.2, 2.3, 2.4, 2.5, and 2.6.

Sixth, §3.1 recites that “(a)ll teachers should meet the following standards and performance indicators.” Logically, the standards and performance measures should be subparts of §3.1, i.e. §§3.1.1, 3.1.2, 3.1.3, and 3.1.4. Instead, they are numbered 3.2 - 3.6.

Seventh, §3.3 refers to “Experiences and Assessments-Teachers”. This is not a term used in other DOE regulations. It would benefit from a definition.

Thank you for your consideration of our comments and recommendations. Please contact the GACEC office if you have any questions.

Sincerely,

Terri A. Hancharick
Chairperson

TAH:kpc

CC: The Honorable Mark Murphy, Secretary of Education
Dr. Teri Quinn Gray, State Board of Education
Ms. Mary Ann Mieczkowski, Department of Education
Ms. Susan Haberstroh, Department of Education
Ms. Paula Fontello, Esq., Department of Education
Ms. Terry Hickey, Esq., Department of Education
Ms. Ilona Kirshon, Esq., Department of Justice