

**GOVERNOR'S ADVISORY COUNCIL FOR EXCEPTIONAL CITIZENS**

GEORGE V. MASSEY STATION
516 WEST LOOCKERMAN STREET
DOVER, DELAWARE 19904
TELEPHONE: (302) 739-4553
FAX: (302) 739-6126

January 16, 2014

Dr. Susan K. Haberstroh, Associate Secretary
Education Supports and Innovative Practices
Department of Education
401 Federal Street, Suite 2
Dover, DE 19904

RE: 17 DE Reg. 679 [DOE Proposed Curricula Alignment with State Content Regulation (January 1, 2014)]

Dear Dr. Haberstroh:

The Governor's Advisory Council for Exceptional Citizens (GACEC) has reviewed the Department of Education (DOE) proposal to conduct an extensive revision of its standards covering the alignment of school district curricula with State content standards to address Senate Substitute No. 1 for House Bill No. 47. This legislation was enacted in 2005. It stressed the benefits of alignment of district curricula with uniform academic standards and directed districts to submit evidence of alignment to the Department of Education. Council observes that the current regulation is very rigid in defining the documentation that districts must submit to prove alignment of their curricula with State content standards. See §6.0. The proposed standards are less rigid and rigorous. The GACEC would like to share the following observations on the proposed revisions.

First, the proposed regulation contains the following provision covering special populations, including students with disabilities:

5.0. Documentation for Specific Student Populations

As part of its documentation, the district shall explain modifications or enhancements to curricula for specific subgroups such as students with disabilities, gifted students, English learners or any other special population of students and certify alignment to the State Content Standards.

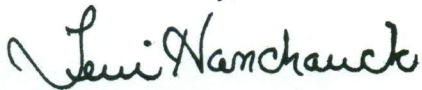
This is a variation on current §6.2.1 and Council appreciates its retention in the proposed regulation.

Second, in §2.0, definition of "Evidence", there is a plural pronoun ("their") with a singular antecedent ("district"). Council recommends substituting "its" for "their".

Third, the standards appear to have transformed from one extreme to the other. The current standards include more specific and more objective criteria based on assessments and data. For example, §6.1.1 requires an analysis of "disaggregated student performance data on state assessments over the most recent three year period." Section 6.1 requires documentation of alignment by grade clusters, i.e., K-2, 3-5, etc. This concept is absent from the proposed regulation. Section 6.1.2 contemplates completion of a survey process ["Survey of Enacted Curriculum (SEC)] sponsored by the Council of Chief State School Officers resulting in an objective Alignment Index of .50 or higher. The Department may wish to consider whether the proposed standard criteria may be considered too general.

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. Donna Mitchell, Professional Standards Board
Dr. Teri Quinn Gray, State Board of Education
Ms. Mary Ann Mieczkowski, Department of Education
Ms. Paula Fontello, Esq.
Ms. Terry Hickey, Esq.
Ms. Ilona Kirshon, Esq.