

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

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Chris Kenton, Executive Director  
Delaware Professional Standards Board  
Townsend Building  
401 Federal Street, Suite 2  
Dover, DE 19901

**RE: 19 DE Reg. 243/14 DE Admin. Code 1595 PSB/DOE Proposed Certification Programs for Leaders in Education Regulation (October 1, 2015)**

Dear Mr. Kenton:

The Governor's Advisory Council for Exceptional Citizens (GACEC) has reviewed the proposal of the Professional Standards Board, in conjunction with the Department of Education, to amend its certification standards for Certification Programs for Leaders in Education. Council would like to share one concern on the proposed amendment.

The DOE Secretary makes the final decision to approve both an initial and renewal application to offer a covered program (§4.15 and §4.3.3.3). However, the supporting roles of the State Board of Education (SBE) and Professional Standards Board (PSB) are significantly changed. Consider the following:

A. The current regulation contemplates SBE involvement in the initial review process (current §§4.1.5 and 4.1.6) and the renewal review process (current §§4.3.4.3 and 4.3.4.4). The proposed regulation strikes the involvement of the SBE in the initial application review process. The opposite is true for the renewal process, i.e., the SBE remains highly involved in the review of renewal applications (new §§4.3, 4.3.3.1, and 4.3.3.2).

B. The current regulation contemplates PSB involvement in both the initial review process (§§4.1.2, 4.1.3, 4.1.4, and 4.2) and the renewal review process (current §§4.3.2, 4.3.4, 4.3.4.1, 4.3.4.2, 4.3.4.3 and 4.3.4.4). The new regulation strikes the involvement of the PSB in the renewal review process in its entirety.

It is unusual to recognize that the SBE has expertise to warrant involvement in the review of renewal applications but not the initial applications. In a similar manner, it is also unusual to recognize that the PSB has expertise to warrant involvement in the review of initial applications but not renewal applications. Finally, other sections of the regulation contemplate the involvement of both the SBE and PSB in the program monitoring process (§7.0). The following table illustrates the effect of the revisions:

	INITIAL APPLICATION REVIEW AGENCY	RENEWAL APPLICATION REVIEW AGENCY	MONITORING
Current Regulation	Professional Standards Board State Board of Education	Professional Standards Board State Board of Education	Professional Standards Board State Board of Education
Proposed Regulation	Professional Standards Board	State Board of Education	Professional Standards Board State Board of Education

Reasonably, it would be helpful to have the same agency or agencies involved in reviewing a renewal application since they would be familiar with the original application. For example, the PSB may have recommended "special considerations or conditions" (§4.1.4) which it could target in a review of a renewal application. Furthermore, since the duration of the initial approval is variable and could be short (§4.1.4), the review of a renewal application may occur within a short time of review of an original application.

Thank you for your consideration of our observations. Please contact me or Wendy Strauss at the GACEC office if you have any questions.

Sincerely,

Robert D. Overmiller  
Chairperson

RDO:kpc

CC: The Honorable Dr. Steven H. Godowsky, Secretary of Education  
 Dr. Teri Quinn Gray, State Board of Education  
 Mary Ann Mieczkowski, Department of Education  
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