



Governor's Advisory Council for Exceptional Citizens (GACEC) 516 West Loockerman St., Dover, DE 19904  
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July 25, 2018

[DOEregulations.comment@doe.k12.de.us](mailto:DOEregulations.comment@doe.k12.de.us)

Department of Education  
Office of the Secretary  
Attn: Regulation Review  
401 Federal Street, Suite 2  
Dover, DE 19901

**RE: 22 DE Reg. 11/14 DE Admin. Code 290 [DOE Proposed Alternative Routes to Certification for Teachers of Students with Disabilities Regulation (July 1, 2018)]**

Dear Secretary Bunting:

The Governor's Advisory Council for Exceptional Citizens (GACEC) has reviewed the Department of Education (DOE) proposal to implement the requirements of House Bill 286 codified in 14 *Del. C.* § 1266. The proposed amendment incorporates these statutory requirements into the regulations. Council supports the proposed amendments as it closely tracks the statutory language; however, we would like to share the following observations and minor suggested amendments.

First, section 9.1.1.1 uses the term "initial certification." A participant in an Alternate Route to Certification (ARTC) program may be issued an initial *license* and a Certificate of Eligibility or an Emergency Certificate. Emphasis added. It is more clear and accurate to change "initial certification" to "licensure and certification."

Second, section 9.1.1.1 states that a teacher ARTC participant "hired after July 1 of a school year shall fulfill *the* 120-hour seminar/practicum requirement prior to the start of the following school year." Emphasis added. The 120-hour practicum requirement for ARTC participants is not located in proposed Section 9.0; rather the practicum requirement is in 14 DE Admin C. § 1507. Section 1507 contains program requirements for ARTC programs that also apply to ARTC programs for teachers of students with disabilities. It may be clearer to refer the reader to 14 DE Admin. C. §1507 for the practicum requirement and other ARTC program requirements that are

located in §1507, but not in §290. Council would recommend inclusion of language in Section 9.0 such as the following: “In addition to satisfying the provisions of 14 DE Admin. Code 1507, alternative routes to certification programs for teachers of students with disabilities must meet the following requirements, pursuant to 14 *Del. C.* § 1266.”

Third, use of the term “program” in Section 290 means Educator Preparation Programs. 14 DE Admin. C §290.2.0. ARTC programs are not Educator Preparation Programs based on the definition in this section. The proposed amendment adds Section 9.0, which addresses ARTC programs, not Educator Preparation Programs. Council would like to recommend that the DOE consider amending the definition of Educator Preparation Programs as follows: “except that where used in Section 8.0 and Section 9.0 of this regulation, the word ‘program(s)’ shall mean the program(s) approved pursuant to said section(s).” The recommended insertions are shown by underline.

Thank you for the opportunity to share our observations with you. Please contact me or Wendy Strauss at the GACEC office if you have any questions on our comments.

Sincerely,

*Ann C Fisher*

Ann C. Fisher  
Chairperson

ACF: kpc

CC: Dr. Dennis L. Loftus, State Board of Education  
Mary Ann Mieczkowski, Department of Education  
John Wolgamot, State Board of Education  
Mr. Chris Kenton, Professional Standards Board  
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