



Governor's Advisory Council for Exceptional Citizens (GACEC) 516 West Lookerman St., Dover, DE 19904  
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December 3, 2018

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

**RE: 22 DE Reg. 333/14 DE Admin. Code 290 [DOE Proposed Approval of Educator Preparation Programs Regulation (November 1, 2018)]**

Dear Secretary Bunting:

The Governor's Advisory Council for Exceptional Citizens (GACEC) has reviewed the Department of Education (DOE) proposal to amend the procedural requirements for becoming an approved Alternative Route for Teacher Licensure and Certification (ARTC) program to align with House Bill No. 433. Council supports the proposed amendments; however, we would like clarification on how the proposed changes to 14 DE Amend. Code 290 will align with 14 DE Admin. Code 1507.

House Bill 433 amended 14 *Del. C.* §1260 to require Alternative Route for Teacher Licensure and Certification (ARTC) programs to provide two types of training to program participants: (1) "a seminar and practicum" that includes "formal instruction or professional development, ... supervised teaching experiences..., and "orientation to the policies, organization, and curriculum of the employing district or charter school"; (2) a minimum of "200 hours of formal instruction, or equivalent professional development" addressing "curriculum, student development and learning..., [and] the classroom and the school." House Bill 433 directed the Department of Education to create implementing regulations.

The current version of 14 DE Admin. Code 290.8.0 outlines the procedural requirements for becoming an approved ARTC program; referring to 14 DE Admin. Code 1507 and "any applicable statute" for the substantive requirements of what types of supervision and training

must be included in an approved ARTC program. The proposed amendment removes references to Section 1507 and “any applicable statute.” It adds in two substantive requirements: (1) that ARTC programs formally evaluate participants; (2) that ARTC programs provide “a summer institute of no less than one hundred and twenty (120) instructional (clock) hours.”

Sections 1507.4.0-7.0 contain functionally identical provisions to those inserted into the proposed amendment to Section 290. However, Sections 1507.4.0-7.0 also include additional substantive ARTC program requirements that are not in the proposed amendment to Section 290.

It appears logical to Council to request that the DOE either move all substantive ARTC program criteria from Section 1507 into Section 290, or amend Section 1507 and incorporate it into Section 290 through reference. If the DOE intends for Section 290 to include an exhaustive list of the statutory requirements for an ARTC program, it may also wish to include the 200-hour professional development requirement rather than listing it as an option.

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  
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