



Governor's Advisory Council for Exceptional Citizens (GACEC) 516 West Loockerman St., Dover, DE 19904  
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May 28, 2019

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

**RE: 22 DE Reg. 894 & 897/14 DE Admin. Code 106A & 107A [DOE Proposed Teacher and Specialist Appraisal Process Delaware Performance Appraisal System Regulation (May 1, 2019)]**

Dear Secretary Bunting:

The Governor's Advisory Council for Exceptional Citizens (GACEC) has reviewed the Department of Education (DOE) proposal to amend 14 DE Admin. Code 106A Teacher Appraisal Process Delaware Performance Appraisal System Revised and 14 DE Admin Code 107A Specialist Appraisal Process Delaware Performance Appraisal System Revised. These proposals clarify the definitions of "Credentialed Observer" and "Evaluator" and ensure compliance with the *Delaware Administrative Code Drafting and Style Manual*.

Council appreciates the clarification of definitions and does not find anything controversial in the proposed amendment. However, Council would ask why the definition of "Announced Observation" states that the observation "...*may* include the use of an observation form." Council considers the observation form an integral part of the process and queries why the statement reads as though it is not mandatory.

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

Sincerely,

*Ann C Fisher*

Ann C. Fisher  
Chairperson

ACF: kpc

CC: Whitney Sweeney, State Board of Education  
Mary Ann Mieczkowski, Department of Education  
Jenna Ahner, State Board of Education  
Mr. Chris Kenton, Professional Standards Board  
Valerie Dunkle, Esq.