



Governor's Advisory Council for Exceptional Citizens (GACEC)
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September 30, 2020

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

RE: 24 DE Reg. 220/14 DE Admin. Code 505 [DOE Proposed High School Graduation Requirements and Diplomas Regulation (September 1, 2020)]

Dear Secretary Bunting:

The Governor's Advisory Council for Exceptional Citizens (GACEC) has reviewed the Delaware Department of Education (DDOE) proposal to amend §505, which describes the State requirements for high school graduation. The proposed amendment will add the definition for Homeless Youth and allow students who have experienced homelessness during any of their high school years to graduate based on the State's requirements. The proposed amendment states that the DDOE believes this change will remove barriers that could arise if a student experiencing homelessness transfers between high schools that have different/additional requirements for graduation. The Regulation also states that this idea was included in the State's Every Student Succeeds Act Plan.

This proposed amendment will add "Homeless Youth" to 14 Del. Admin. C. § 505.11.0, which currently allows for students in the custody of the Department of Services for Children Youth and Families to graduate based on the graduation requirements in the regulation *in lieu of* the particular District or Charter School's graduation requirements. Given the "transient nature" of homelessness, youth who are homeless often experience "significant disruption in their education." National Conference of State Legislatures, <https://www.ncsl.org/research/human-services/homeless-and-runaway-youth.aspx>.

Council **supports** the proposed regulation since it will bring Delaware in line with several other states that have passed similar legislation and will reduce barriers for students who experience homelessness. However, we acknowledge that there is still work to be done in this area and look forward to working with the DDOE to assist students.

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

Respectfully,

Ann C Fisher

Ann C. Fisher
Chairperson

ACF: kpc

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