



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. 227/14 DE Admin. Code 1520 [DOE Proposed Early Childhood Teacher Standard Certificate Regulation (September 1, 2020)]

Dear Secretary Bunting:

The Governor's Advisory Council for Exceptional Citizens (GACEC) has reviewed the Professional Standards Board (PSB) and Delaware Department of Education (DDOE) proposal to amend the requirements for obtaining the Early Childhood Teacher standard certificate. Council **supports** the proposed amendment; however, we would like to share the following observations and suggestions.

PSB and DDOE are proposing to amend this regulation to clarify language in Section 1.0, add definitions to Section 2.0, clarify the requirements for issuing a Certificate and add sections 6.0-9.0, which concern the validity of the Certificate, disciplinary actions, requests for the Secretary of Education to review applications and recognize past certifications.

First, proposed §1520.6 establishes that an educator with a certificate under this section is not required to *renew* the certificate *as long as* their educator's license is valid and current. For background, an educator's initial license is valid for four years at which point they can apply for a continuing license, which is valid for five years. After five years, the educator can apply to renew their license. That renewal requires a certain number of professional development hours along with other requirements. The purpose of these professional development hours is to ensure that Delaware educators are continuing to learn and develop their practice, just as other professions are required to do.

The Board does not prescribe specific professional development for educators. This is true for educators possessing one of the many standard certifications that are available, including the certification under proposed §1520. The only requirements for professional development, found at 14 Del. Admin. C. §1511.6, are that it should include at least 90 "Clock Hours" which are related to 14 Del. Admin. C.

§1597 (Delaware Professional Teaching Standards), 14 Del. Admin. C. §1590 (Delaware Administrator Standards), or “appropriate specialty organization standards.” Therefore, it is possible that an educator with this certificate will not actually participate in any professional development related to their certification.

The GACEC would like to recommend that DDOE consider whether including requirements for renewal of this certificate is warranted. For ease, the renewal of this certificate could coincide with the date of renewal for the educator’s license. Proposed requirements for renewal could include activities such as participation in a mandated number of hours (out of the 90 required) of professional development related to this certificate or additional mentoring on top of the current mentoring requirements.

Second, proposed §1520.8 establishes an additional route to obtaining a certificate under this section. Specifically, it allows the DDOE Secretary of Education to review and grant certification where the educator does not meet the requirements necessary. This review would be prompted at the request of a local school or school district and would need to be supplemented with documentation showing the educator’s effectiveness.

Proposed §1520.8 mirrors similar language found in 14 Del. C. §1224, which allows the Secretary to “review licensure and certification credentials on an individual basis and to act upon same at the request of the local school district or charter school provided that the local school district or charter school is able to document the effectiveness of the applicant.” Although proposed §1520.8 is aligned with current regulations concerning standard certificates, DDOE cannot forget that educators within this category should be some of Delaware’s most capable educators. Council would like to recommend that DDOE remove proposed §1520.8 or, alternatively, remove the language allowing for a review by the Secretary where an applicant does not meet the listed requirements. Applicants for this certification should exemplify the most qualified, not individuals who are unable to meet the standard requirements.

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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