



Governor's Advisory Council for Exceptional Citizens (GACEC)
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March 26, 2021

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

RE: 24 DE Reg. 833/14 DE Admin. Code 502 [DOE Proposed Alignment of Local District Curricula to State Content Standards Regulation (March 1, 2021)]

Dear Secretary Bunting:

The Governor's Advisory Council for Exceptional Citizens (GACEC) has reviewed the Delaware Department of Education (DDOE) proposal to amend 14 DE Admin. Code 502 in reference to the Alignment of Local School District Curricula to the State Content Standards. The purpose of this amendment would be to align with modifications in State Content Standards and Department of Education reporting expectations of school districts and charter schools and to clarify the title of the regulation. Council **endorses** the proposed amendment since it adds charter schools and will improve transparency and accountability. However, we would like to submit the following observations and requests for additional information.

First, in the definition of "High Quality Instructional Materials", Council queries what is meant by the expectation of the provision of "equitable access". This provision of "equitable access" is also mentioned in section 5.0 "The district or charter school shall also certify alignment and equitable access to the grade-level or course-level State Content Standards" for these subgroups.

Two, there are substantial changes made to Section 3.0 Alignment Requirements. The section now states that school districts AND charter schools must "provide evidence to the Department that their curricula are aligned with the State Content Standards" Council would like additional information on the unit within the Department of Education that will be responsible for reviewing curricula to ensure alignment.

Three, the draft language makes changes to Section 6.0 Subsequent Review of Alignment. The proposed language includes charter schools in these requirements. The draft changes the language from a requirement “to certify curriculum alignment” to “maintain alignment” if curriculum changes occur. The draft also eliminates the sentence stating that, “Further, districts may be required to submit documentation of aligned curriculum in the assessed content area or areas which form the basis for any school rating.” Council would like additional information on what would trigger a DOE review. Is there a rubric that should be followed? How are those reviews conducted? Also, what are the consequences of failure to align?

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

Sincerely,

Ann C Fisher

Ann C. Fisher
Chairperson

ACF: kpc

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