



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

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

**RE: 24 DE Reg. 931/14 DE Admin. Code 1574 [DOE Proposed Teacher of Students Who Are Deaf or Hard of Hearing Requirements Regulation (April 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 the regulations, which describe the requirements for obtaining the Teacher of Students Who Are Deaf or Hard of Hearing standard certificate. DDOE, in cooperation with the Professional Standards Board, is proposing to amend this regulation to add definitions to Section 2.0, clarify the requirements for issuing a Certificate, specify application requirements, 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, recognizing past certifications, respectively. Council **supports** the proposed regulation as it is written so long as the proposed changes align with the Bill of Rights for Children Who Are Deaf or Hard of Hearing as well as other applicable laws and regulations. Council would like to share the following question and observation.

First, under the impact criteria, DDOE states that the "The education, knowledge, and skill requirements in Section 4.0 are designed to improve the quality of the educator workforce, which will help to improve student achievement." Councils would ask that the DDOE explain *how* these proposed changes will help improve student achievement.

Second, proposed §§1574.4.1.2 and 1574.4.1.5 are virtually identical to the current §§1574.4.1.1 and 1574.4.1.2. The proposed regulations would expand these additional prescribed requirements

to allow an applicant to obtain the Certificate if they (1) currently hold a specialist certificate in the area of Deaf or Hard of Hearing from the National Board for Professional Teaching Standards; (2) satisfactorily complete an alternate route for licensure to teach students who are Deaf or Hard of Hearing; or (3) satisfactorily complete a Department-approved educator preparation program in deaf education.

Delaware law requires that when developing an individualized education plan (IEP) for children who are Deaf or Hard of Hearing, the local education agency (LEA) must consider “[t]he provision of optimal, direct, and ongoing language access to teachers of the deaf and hard of hearing...who are knowledgeable due to specific training and who are proficient in the child’s primary communication mode or language[,]” as well as “[t]he provision of communication-accessible academic instruction, school services, and direct access to all components of the educational process[.]” 14 Del. C. §3112. Council queries whether individuals who obtain their certificates in this manner will have the training and proficiency necessary to provide optimal instruction to this student population.

Thank you for the opportunity to share our support of this proposed amendment. Please contact Wendy Strauss or me if you have any questions on our comments.

Sincerely,

*Ann C Fisher*

Ann C. Fisher  
Chairperson

ACF: kpc

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