



**Governor's Advisory Council for Exceptional Citizens (GACEC)  
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June 29, 2022

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

**RE: 25 DE Reg. 1100/DE Admin. Code 1581 DDOE Proposed School Reading Specialist regulation (June 1, 2022)**

Dear Secretary Holodick:

The Governor's Advisory Council for Exceptional Citizens (GACEC) has reviewed the Delaware Department of Education (DDOE) revised proposal, in conjunction with the Professional Standards Board to amend 14 Del. Admin. C. § 1581, which describes the requirements for obtaining the School Reading Specialist standard certificate. Council **supports** this latest revision of the regulation. Council also appreciates the fact that the DDOE accepted and made changes based on our recommendation to keep the existing course title of Teaching English as a Second Language. However, we would like to note our concern with the language in proposed Sections 2.0 and 3.0 in reference to conflicting definitions for the same terms, which may lead to discrepancies in application. Council queries whether the DDOE has ever considered having one section within the 1500 series of regulations housing all definitions applicable to the series. Council notes for example that §§ 1502, 1507, 1508, and 1509 have all previously been repealed and any of those could easily serve as a new designated "Definitions" section.

Thank you for this opportunity to share our support and concerns with you. Please contact Pam Weir or me at the GACEC office if you have any questions on our comments.

Sincerely,

*Ann C Fisher*

Ann C. Fisher  
Chairperson

ACF: kpc

CC: Whitney Sweeney, State Board of Education

Shawn Brittingham, State Board of Education  
Mary Ann Mieczkowski, Department of Education  
Emily Cunningham, Department of Education  
Linnea Bradshaw, Professional Standards Board  
Jenna Ahner, State Board of Education  
Carla Jarosz, Esq.