



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

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

RE: 25 DE Reg. 934/DE Admin. Code 1581 DDOE Proposed School Reading Specialist regulation (April 1, 2022)

Dear Secretary Holodick:

The Governor's Advisory Council for Exceptional Citizens (GACEC) has reviewed the Delaware Department of Education (DDOE) 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 would like to share the following observations on the sections that have been added since the May 1, 2021 proposed regulations.

As background, DDOE originally published this proposed amendment in the Delaware Register of Regulations on November 1, 2020. After receiving written comments, DDOE republished the same proposed amendment, without any changes, in the Register on January 1, 2021, to allow additional time for written comments. Furthermore, the Board held a public hearing on February 4, 2021, concerning the proposed amendments. Subsequently, the Board held presentations on April 1, 2021, regarding school reading specialists, International Literacy Association (ILA) standards for reading/literacy specialists and International Dyslexia Association (IDA) standards. After reviewing the comments and presentations, the Board republished the same proposed amendment, without changes, on May 1, 2021. After receiving written submissions, DDOE withdrew the proposed regulations on June 3, 2021.

This most recent iteration of the proposed amendments is identical to those that were previously published except for the following changes:

1. Revising the definition for "Valid and Current License or Certificate" in Section 2.0 to clarify that it is referring to an educator's license or certificate;
2. Removing the prior proposed section on reciprocity and revising the requirements for the same in Section 3.0;
3. Revising subsection 4.1.1.1 to clarify the requirements and add the IDA standards as an option;
4. Revising the course title in subsection 4.1.1.1.2.5;

5. Moving the section concerning the Secretary of Education review to Section 6.0 and renumbering the subsequent sections concerning validity and disciplinary actions; and
6. Adding Section 10.0, which concerns applicants' and Educators' contact information with the Department and specifies how they can change their name or address.

Since comments on the earlier proposed amendments were already submitted by the GACEC, we will focus only on those proposed changes, which are new and relevant in this most recent iteration.

The first proposed change is to the definition of “Valid and Current License or Certificate” in Section 2.0. The definition proposed is “...a current full or permanent certificate or license **as an educator** issued by another state or jurisdiction. This means the **applicant** is fully credentialed by having met all of the requirements for full licensure or certification as an educator in another state or jurisdiction and is in good standing in that state or jurisdiction. It does not include temporary, emergency, conditional certificates of eligibility or expired certificates or licenses issued from another state or jurisdiction.” (*emphasis added*). The words “as an educator” were added to clarify that it referred to an educator license or certificate. It also refers then to the individual as an “applicant” rather than an “educator” as was the language in the prior proposed regulations over the course of the past several years. This clarification is helpful; however, as just noted, it makes this definition different from every other definition for this same term that has been more recently proposed and adopted by the State Board of Education.

Council recommends that the definition for the term remain consistent with the prior adopted definitions rather than this new proposed alternative. It would not make sense to have, within the same series, at least two different definitions for the same term. Instead, the “clarified” definition could be re-proposed the next time this series of regulations are updated.

The second proposed change involves the language around reciprocity, specifically proposed 1581.3.1.2. The original proposed language, which is consistent with the other language in the series, is “Has met the requirements for licensure and holds a Valid and Current License or Certificate...” The new proposed language is “Has met the requirements for an educator's license in Delaware and presents proof of a Valid and Current License or Certificate as a Reading Specialist issued by another state or jurisdiction...”. As with the first proposed change, Council recommends that this section be consistent with the other proposed and adopted regulations in this series.

The third proposed change separates the requirements for a Certificate into three categories instead of two and adds an option for the completion of graduate-level credit hours aligned to IDA standards. This is a needed change, which helps understand the requirements more clearly. Specifically, it separates the requirements for an applicant who has completed a bachelor's degree from an applicant who has completed a master's degree in any content area. This did not result in any substantive change.

The addition of the option for completing courses aligned with the IDA Standards was a request put forth by other stakeholders in prior submissions to the Register. The Board held at least two public meetings and sought information on both IDA and ILA standards. If this proposed change were to be adopted, and the higher education institutions in Delaware were to seek IDA accreditation, it would join at least twelve other states with at least one program with IDA accreditation. The GACEC supports the addition of an option for completing courses aligned with IDA standards.

The fourth proposed change relates to the revision of a specific course title. Proposed 4.1.1.1.2.5 has changed the course title of “Teaching English as a Second Language (3 credits)” to “Teaching diverse reading profiles, including teaching English as a Second Language (three credits).” Two comments have already been submitted regarding this change. The first by eleven (11) faculty members of the School of Education at the University of Delaware and the second by Kathryn Brown, the Chair for Reading and English as a Second Language (ESL) programs at Wilmington University. Both comments are in opposition to the proposed change because it is redundant with other course work, inadequate to address the needs of ESL students, and seems to treat ESL students as one single profile within many other profiles rather than giving educators the time and attention necessary to learn effective instructional practices for this diverse group of learners. Council endorses the sentiments provided in these two comments and recommends that this proposed change not be adopted.

Thank you for this opportunity to share our observations and recommendations 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
Mary Ann Mieczkowski, Department of Education
Emily Cunningham, Department of Education
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