



Governor's Advisory Council for Exceptional Citizens (GACEC)
516 West Loockerman St., Dover, DE 19904
302-739-4553 (voice) 302-739-6126 (fax) <http://www.gacec.delaware.gov>

November 30, 2022

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

RE: 26 DE Reg. 364/14 DE Admin. Code 1575 PSB/DDOE Proposed Teacher of Students with Visual Impairments regulation (November 1, 2022)

Dear Secretary Holodick:

The Governor's Advisory Council for Exceptional Citizens (GACEC) has reviewed the Professional Standards Board proposal in collaboration with the Delaware Department of Education (DDOE) to amend 14 **DE Admin. Code** 1575 Teacher of Students with Visual Impairments and the requirements for a Standard Certificate. The proposed regulations also reflect the commitment of DDOE to update the Certificate standards per House Bill No. 382, which was enacted due to the Sunset Committee review of the Division for the Visually Impaired (DVI). Overall, Council supports the proposed amendment; however, we would like to reiterate our concern with one facet of the amendment. Section 6.1 states that "The Secretary of Education may, upon the written request of a local school district or charter school, review credentials submitted in an application for a Teacher of Students with Visual Impairments Standard Certificate on an individual basis and grant such a Standard Certificate to an applicant who otherwise does not meet the requirements for a Teacher of Students with Visual Impairments Standard Certificate but whose effectiveness is documented by the local school district or charter school."

Council has noted on other regulations that we are concerned by and object to giving the Secretary of Education the ability to override certification requirements. We are particularly concerned in this instance because a teacher of students with visual impairments requires such a large degree of specialized skill and training. Allowing the Secretary to override those requirements and certify teachers who have not met these requirements could lead to less effective teachers and a deficit in the ability of the students these teachers are responsible for.

Thank you for this opportunity to share our 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: Shawn Brittingham, State Board of Education
Kathleen Smith, State Board of Education
Dale Matusevich, Department of Education
Emily Cunningham, Department of Education
Linnea Bradshaw, Professional Standards Board
Carla Jarosz, Esq.
Alexander Corbin, Esq.