



Governor's Advisory Council for Exceptional Citizens (GACEC)
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January 30, 2023

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

RE: 26 DE Reg. 528/14 DE Admin. Code 1206 DDOE Proposed Speech Language Pathologist Incentive Loan Program regulation (January 1, 2023)

Dear Secretary Holodick:

The Governor's Advisory Council for Exceptional Citizens (GACEC) has reviewed the Delaware Department of Education (DDOE), through the Delaware Higher Education Office (DHEO), proposal to amend 14 **DE Admin. Code** 1206 Speech Language Pathologist Incentive Loan Program. The Speech Language Pathologist (SLP) Scholarship Program is a student financial assistance for higher education program administered by DHEO. The proposed changes are being made to align with House Bill No. 480. Council would like to share the following observations.

The regulation provides the eligibility criteria, the application process, and the award process for the Speech Language Pathologist Scholarship Program. The proposed amendments include: (1) revising the title of the regulation; (2) revising the name of the program in Section 1.0; (3) adding and striking definitions in Section 2.0; (4) clarifying the application process in Section 3.0; (5) revising the eligibility requirements in Section 4.0; and (6) revising the awards process in Sections 5.0 and 6.0. Moreover, the Department proposes to renumber the regulation from 1203 to 1212.

Section 4.0 concerns the eligibility for an award. The eligibility section maintains that the applicant shall be a "Full-Time Student enrolled in a graduate program in Delaware that will satisfy the educational requirements to become licensed by the Delaware Board of Speech Pathologists [...]." This is also true of the ScIP program. These are statutory requirements. (see 14 Del Code 3411 and 3435). The restriction to full time students could present obstacles to students with disabilities who may not be able to attend a full-time program. The National

Council on Disability reported that disability may prevent some students from accessing financial aid for college and graduate school. Students with disabilities may also have difficulty attending school full-time because of the impact of their disability. It may be that the scholarship programs would have to make reasonable modifications under the Americans with Disabilities Act (ADA) and Section 504 to allow exceptions to this rule. Council notes that at this time, no Delaware SLP graduate preparation program permits part-time students. In the event that this changes, Council would recommend that the scholarship program be made available to part-time students as well.

Thank you for allowing us the opportunity to share our observations 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
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