



Governor's Advisory Council for Exceptional Citizens (GACEC)
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March 26, 2026

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

RE: 29 DE Reg. 743/14 DE Admin. Code 505 DDOE Proposed High School Graduation Requirements and Diplomas regulation (March 1, 2026)

Dear Secretary Marten:

The Governor's Advisory Council for Exceptional Citizens (GACEC) has reviewed the Delaware Department of Education (DDOE) proposal to amend 14 Del. Admin. C. § 505 to include financial literacy as a graduation and diploma requirement. Council **supports** the proposed amendment and would like to share the following suggestions and recommendations.

Council is grateful for the addition of financial literacy as this will be important for all students but particularly so for students with disabilities. As noted in our letter on regulation 742, financial literacy is important to individuals with disabilities especially as they are frequently targeted online and in social media by individuals with ill intent. A focus on financial literacy will aid them in making better decisions in regard to finances online.

Second, Council fears that the definition of "Adult Education" may create confusion because special education in adult correctional facilities is operated by the James H. Groves High School, but is a K-12 educational program. Also, the federal Workforce Innovation and Opportunities Act (WIOA), section 203 defines adult education as "academic instruction and education services below the postsecondary level that increase an individual's ability to— (A) read, write, and speak in English and perform mathematics or other activities necessary for the attainment of a secondary school diploma or its recognized equivalent; (B) transition to postsecondary education and training; and (C) obtain employment." Council would therefore recommend that DDOE use the WIOA definition. Council would also suggest the DDOE clarify the meaning of "programs".

Thank you for this opportunity to share our observations and recommendations with you. We look forward to a more collaborative partnership with you on behalf of the students of Delaware. Please contact us if you have any questions on our comments. Thank you for your consideration.

Sincerely,

William H. Doolittle

William H. Doolittle
Chairperson

WHD: kpc

CC: Jon Sheehan, State Board of Education
Kathleen Smith, State Board of Education
Dale Matusevich, Department of Education
Michael Saylor, Department of Education
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