Governor's Advisory Council for Exceptional Citizens (GACEC)
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June 29, 2026

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

RE: 29 DE Reg. 960/14 DE Admin. Code 505 DDOE Proposed High School Graduation Requirements and Diplomas regulation (June 1, 2026)

Dear Secretary Marten:

The Governor's Advisory Council for Exceptional Citizens (GACEC) reviewed the initial Delaware Department of Education (DDOE) proposal to amend 14 Del. Admin. C. § 505 in March of 2026. DDOE determined that based on public comment, substantive amendments were needed and has now proposed those changes in regulation 960 to include financial literacy in high school graduation requirements and diploma regulations.

The March 2026 publication of the amendment to Regulation 505 had three main points of feedback from the GACEC and others:

1. Noted that for students with disabilities, online and social media safety should be addressed in the curriculum, as individuals with ill intent target individuals with disabilities in this way.

2. Recommended that James H. Groves special education services be added along with Division of Services for Children, Youth and their Families (DSCYF) at the beginning of the new subsection 9.1.

3. Suggested 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, and recommended that the definition be modified accordingly. Council also recommended that the DDOE use the Workforce Innovation and Opportunities Act (WIOA) definition instead. Council noted that it is also unclear what DDOE intends "programs" to mean.

The new proposal adds various exemptions to the adult education requirements. These are bolded below and include:

> 5.0 Credit Requirements for State of Delaware High School Diploma - Beginning with the Graduation Class of 2019 (Freshman Class of 2015-2016) through the Graduation Class of 2029 (Freshman Class of 2025-2026)
>
> 5.1.2 Scientific investigations related to the State ~~Science~~ Science Content Standards shall be included in all ~~three (3)~~3 Science course requirements. The student shall complete a Biology course as one (1)1 of the Science credits. **Students within adult education programs are exempted from scientific investigation requirements.**
>
> 5.1.4 During ~~the senior year~~ the student senior year, public school students shall maintain a credit load each semester that earns the student at least a majority of credits that could be taken that semester. **Students within adult education programs are exempted from senior year requirements.**
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> 7.0 Credit Requirements for State of Delaware High School Diploma Beginning with Graduation Class of 2030 (Freshman Class of 2026 – 2027)
>
> **7.1.2 Students within adult education programs are not required to complete credits in Physical Education as part of the minimum 24 credits required for graduation.**
>
> **7.2.3 Students within adult education programs are exempted from senior year requirements.**
>
> 7.3.2 Science: Scientific investigations related to the State Content Standards must be included in all 3 science course requirements. Students shall complete a Biology course as 1 of the 3 required Science credits. **Students within adult education programs are exempted from scientific investigations requirement.**

Council would like to request an explanation for the noted exemptions.

The June 2026 proposal also does not address the more complex issues noted in our earlier letter in any substantive matter. For instance, concerns were raised that the Financial Literacy requirement would result in less time for existing curricula, particularly Social Studies. Despite declines in the national averages for proficiency in civics and history, the June 2026 proposal does not alleviate these concerns.

Additionally, the June 2026 proposal fails to adequately acknowledge the severity of financial fraud and other financial risks for people with disabilities or the general population. In its response to Issue #9, DDOE suggests Financial Literacy Standard Four as a balm for this point. Considering how widespread financial fraud and gambling currently are, it is difficult to find this reassuring without more detailed curriculum requirements.

Adding Financial Literacy to high school requirements is logical and appreciated. The General Assembly's rationale for passing House Bill (HB) 203 was sound and is also appreciated. However, the cost of living in America for necessities has surged in recent decades, while wages have failed to keep pace, making financial literacy a critical need in our society today. However, it should be noted that one cannot budget their way out of poverty.

At the same time, it is important to be cognizant of the fact that, according to the National Disability Institute, "[t]he poverty rate for adults with disabilities is more than twice the rate of adults with no disability (27 percent compared with 12 percent)." The National Disability Institute goes on to explain that:

> **Poverty causes disability:** Children living in poverty are more likely to have asthma, chronic illness, environmental trauma such as lead poisoning, learning problems and low

birth weight that lead to disabilities. People in more physically demanding jobs are also more likely to suffer workplace illnesses and injuries.

Disability causes poverty: Disability adversely affects employment possibilities and earnings. It also can impose additional costs on families, such as medical bills, transportation, modifications to their home and personal assistants.

Therefore, it is important to ask if a Financial Literacy curriculum that chiefly focuses on Financial Literacy Standards One, Two, and Three is appropriate for a demographic that is predisposed to poverty during a time-period of general economic decline. A Financial Literacy curriculum with adequate content regarding predatory business practices, scams and gambling would be of much greater use to individuals with disabilities and the population as a whole.

Additionally, there is strong reason to be concerned that adding the Financial Literacy requirement to the existing 24 credit requirement for high school graduation will result in a constrained schedule with less time for other subjects. During an American "learning recession," it is incumbent on us to approach changes to the curriculum with a critical lens.

Finally, Council would recommend that the DDOE involve further stakeholder discussion in order to implement the requirements of HB 203 through a proposal that more adequately addresses the concerns related to constraining schedule and time for other subjects, and including language around education about financial exploitation risks.

Thank you for this opportunity to share our observations and recommendations on this new proposed version of these regulations. 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
Linnea Bradshaw, Professional Standards Board
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