



STATE OF DELAWARE
STATE COUNCIL FOR PERSONS WITH DISABILITIES
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May 29, 2014

Dr. Donna Lee Mitchell, Executive Director
Professional Standards Board
Townsend Building
401 Federal Street
Dover, DE 19901

RE: 17 DE Reg. 1032 [PSB Proposed Educational Technology Standards Regulation]

Dear Dr. Mitchell:

The State Council for Persons with Disabilities (SCPD) has reviewed the Professional Standards Board's [in collaboration with the Department of Education (DOE)] proposal to adopt a set of national technology standards for all Delaware educators. The National Educational Technology Standards (NETS) are incorporated by reference into the regulation. The proposed regulation was published as 17 DE Reg. 1032 in the May 1, 2014 issue of the Register of Regulations. SCPD has the following observations.

First, although §1.2 reflects the DOE's intent that the standards apply to "all Delaware educators", the balance of the regulation only covers administrators (§2.0) and teachers §3.0). This is odd and incongruous. School library media specialists regulated by 14 DE Reg. 1580 are omitted. Paraprofessionals regulated by 14 DE Reg. 1517 are omitted. School psychologists regulated by 14 DE Reg. 1583 are omitted.

Second, §1.3 recites that "(a) summary of the standards is set forth within". This is "odd" wording. Consider substituting "within this regulation".

Third, §2.1 is not a sentence. It lacks a predicate. The Delaware Administrative Code Style Manual, §6.2.3, requires parallel form within regulations. Sections 2.2 - 2.6 have headings followed by sentences.

Fourth, §§2.2.1.1, 2.2.1.2, and 2.1.1.3 lack a subject. Consider adding "Educational Administrators fulfill the following functions:" in §2.2.1 after the word and punctuation "organization." Punctuation should also be added to §§2.2.1.1, 2.2.1.2, and 2.1.1.3.

Fifth, the heading to §2.0 refers to "leaders" while the text of the section refers to "school

administrators” and “leaders”. For consistency, the heading to §2.0 could be amended to read “...Leaders and Educational Administrators”. Since “educational administrators” is not a term used in other DOE regulations, it would also benefit from a definition. Finally, the Delaware Administrative Code Style Manual, §6.2.2, encourages use of consistent references. Therefore, the term “school administrators” in §2.1 could be revised to read “educational administrators” for consistency with §§2.2, 2.3, 2.4, 2.5, and 2.6.

Sixth, §3.1 recites that “(a)ll teachers should meet the following standards and performance indicators.” Logically, the standards and performance measures should be subparts of §3.1, i.e. §§3.1.1, 3.1.2, 3.1.3, and 3.1.4. Instead, they are numbered 3.2 - 3.6.

Seventh, §3.3 refers to “Experiences and Assessments-Teachers”. This is not a term used in other DOE regulations. It would benefit from a definition.

Thank you for your consideration and please contact SCPD if you have any questions or comments regarding our observations on the proposed regulation.

Sincerely,



Daniese McMullin-Powell, Chairperson
State Council for Persons with Disabilities

cc: The Honorable Mark T. Murphy
Dr. Teri Quinn Gray
Ms. Mary Ann Mieczkowski
Ms. Paula Fontello, Esq.
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