



STATE OF DELAWARE
STATE COUNCIL FOR PERSONS WITH DISABILITIES
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October 29, 2010

Ms. Susan K. Haberstroh
Education Associate
Department of Education
401 Federal Street, Suite 2
Dover, DE 19901

RE: 14 DE Reg. 222 [DOE Proposed World Language Credit Regulation]

Dear Ms. Haberstroh:

The State Council for Persons with Disabilities (SCPD) has reviewed the Department of Education's (DOE's) proposal to amend its regulations for high school graduation by increasing the number of required credits from 22 to 24 for the graduation class of 2015. This is achieved by requiring 2 credits in a World Language. The proposed regulation was published as 14 DE Reg. 222 in the October 1, 2010 issue of the Register of Regulations. Council has the following observations.

First, consistent with the attached July 27, 2006 letter, SCPD previously submitted multiple concerns with the DOE when it proposed a requirement of World Language credits to graduate. At that time, the Councils shared a News Journal article reciting as follows:

The state teachers' union, while supportive of the majority of the proposal, questions requiring foreign language for all students. Those with disabilities or those not college-bound, the union suggests, might benefit more from an extra year of science, social studies, or career preparation.

This observation, as well as other concerns raised in the 2006 letter, remain apt.

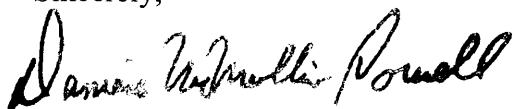
Second, SCPD endorses the inclusion of American Sign Language (ASL) in the definition of "World Language". The Council issued this recommendation to DOE in 2006 and supported legislation (H.B. 345) which now mandates inclusion of ASL as a World Language in Delaware's public schools. See attached May 6, 2010 memo and copy of enacted H.B. 345.

Third, in §1.0, definition of “World Languages”, DOE should consider substituting “people” for “peoples”. The term “people” is defined as “the body of persons that compose a community, tribe, nation, or race”.

Fourth, §5.2 is problematic in the context of proficiency standards. Literally, Deaf students would be subject to an achievement test for “speaking”. Moreover, all students would be required to meet a “Novice-high” proficiency level which is defined by the American Council for the Teaching of Foreign Languages (ACTFL). SCPD suspects that the ACTFL does not have proficiency standards for ASL and may or may not have standards for Latin and Ancient Greek. The Department should consider including a distinct proficiency standard for ASL and, if not covered by ACTFL, Latin and Ancient Greek

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 Lillian Lowery
Dr. Teri Quinn Gray
Ms. Martha Toomey
Ms. Paula Fontello, Esq.
Ms. Terry Hickey, Esq.
Mr. John Hindman, Esq.
Mr. Charlie Michels
Mr. Brian Hartman, Esq.
Ms. Della Thomas
Council on Deaf and Hard of Hearing Equality
Delaware Hands and Voices
Developmental Disabilities Council
Governor’s Advisory Council for Exceptional Citizens

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STATE OF DELAWARE
DEPARTMENT OF ADMINISTRATIVE SERVICES
STATE COUNCIL FOR PERSONS WITH DISABILITIES

MARGARET M. O'NEILL BUILDING
410 FEDERAL STREET, SUITE 1
DOVER, DELAWARE 19901

July 27, 2006

VOICE: (302) 739-3613
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The Honorable Valerie Woodruff
Secretary of Education
401 Federal Street
Dover, DE 19901

RE: 10 DE Reg. 30 [Proposed Graduation Regulations]

Dear Secretary Woodruff:

The State Council for Persons with Disabilities (SCPD) has reviewed the Department of Education's (DOEs) proposal to amend its regulations regarding *High School Graduation Requirements and Diplomas* published as 10 DE Reg. in the July 1, 2006 issue of the Register of Regulations. The most significant changes are as follows: 1) increasing the overall number of credits to graduate from 22 to 24; 2) requiring 4 math credits rather than 3 math credits, one of which must be earned in the student's senior year; 3) requiring 2 credits in a "world language"; and 4) requiring the development of an individual learning plan for all eighth grade students with progress monitored by instructional support teams. SCPD strongly opposes the proposed regulations based on the following observations and recommendations.

First, the synopsis of the regulations recites that the amendments are based on a report of a "High School Graduation Requirements Committee". After review of the Committee membership, it appears it may have lacked representation of students with disabilities and family members of students with disabilities.

Second, SCPD supports individual learning plans (ILPs) which would provide an individualized system for monitoring progress towards graduation. Inadequate progress is linked to provision of support services. See Section 4.2.1.

Third, Council opposes the requirement of 2 credits in a "World Language". According to the attached June 26 News Journal article, the Delaware teacher's union also questioned this mandate:

The state teachers' union, while supportive of the majority of the proposal, questions requiring foreign language for all students. Those with

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disabilities or those not college-bound, the union suggests, might benefit more from an extra year of science, social studies or career preparation.

Moreover, students with disabilities already struggling with English language arts will predictably have great difficulty with a foreign language. Finally, Deaf students whose primary language is ASL may find it very difficult to learn a foreign language unless it is another form of sign language.

Fourth, there is no definition of "world language". It would be preferable to include a definition which includes ASL.

Fifth, the News Journal article indicates that only 4 states require 24 credits to graduate. This means that most transfer students from other states will have difficulty obtaining a diploma in 4 years.

Sixth, the requirement that students earn a fourth math credit in their senior year is objectionable. If students achieve the four credits by the end of junior year, they should be allowed to take a fifth year elective AP math course (e.g. Calculus II) in high school or by arrangement with a college (e.g. for college credit). The requirement that the fourth credit be earned during the senior year could actually inhibit advance placement students.

Seventh, the effect of more rigorous graduation standards will predictably increase drop-out rates and reduce graduation rates. Consistent with the attached June 21, 2006 News Journal article, Delaware already has a low graduation rate. Delaware ranks 44th among the states for producing high school graduates. Only 61% of Delaware public school students graduated from high school in four years. Moreover, the article underscores that minority students already have lower graduation rates (48% black students; 43% Hispanic students). Students with disabilities also have low graduation rates. Within recent years, requiring students to pass the DSTP has already provided a barrier which many students with disabilities cannot surmount. SCPD strongly opposes the concept of imposing more rigorous graduation requirements since it will exacerbate already low graduation rates for students with disabilities. In effect, the amendments will widen the disparities between minority and non-minority students. For example, it will preclude borderline students from entering military service, a traditional form of advancement for low income students who cannot afford college since a diploma is required for enlistment.

Eighth, if the State does adopt more rigorous graduation standards, it may be preferable to have 2 diplomas, a general and a distinguished diploma. This would permit more students with disabilities to earn a diploma, facilitate borderline student enlistment in the military, and allow access to jobs which only require a diploma.

Ninth, if graduation requirements are to be increased, the State should consider increasing the PE standards or adding some components to enhance physical fitness. See H.B. No. 372, which passed the House and Senate on June 13 and July 1, respectively. Relatively

speaking, there is arguably more of a crisis in student physical health and obesity than in the context of academic deficiencies.

Tenth, the proposed regulations circumscribe district flexibility and autonomy in multiple respects. Examples are as follows:

1. Districts could no longer grant a diploma to students who earn 22 or 23 credits as permitted under current standards.
2. District discretion in the "mix" of credits is limited (e.g. they must require 4 math credits rather than current 3 math credits and require 2 credits in world language rather than current 0 world language credits). Some districts might decide that English language arts classes (e.g. reading and writing) are more important than learning a foreign language. However, they can't substitute courses. Query what is more important in everyday life - reading and writing English well or taking 2 years of a foreign language? A similar analysis could apply to computer skills. In terms of functioning on the job, it may be more important to have 2-3 credits in computer skills and software than in a world language. Likewise, with childhood obesity, diabetes, and other debilitating conditions becoming rampant, districts might decide that more PE or conditioning classes are more important than world language classes.
3. District discretion is limited since the fourth math credit must be earned senior year.

In summary, the regulations do not promote district flexibility and discretion. Rather, they reflect a one-size-fits-all approach to graduation requirements.

Thank you for your consideration and please contact SCPD if you have any questions regarding our position, observations or recommendations on the proposed regulations.

Sincerely,



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

cc: Ms. Jean Allen
Ms. Martha Toomey
Dr. Carol Mayhew
Ms. Paula Fontello, Esq.
Ms. Mary Cooke, Esq.
Ms Jennifer Kline, Esq.
Ms. Susan Keene Haberstroh
Dr. Patricia Carlson
Developmental Disabilities Council
Governor's Advisory Council for Exceptional Citizens ✓



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Push grows for higher graduation standards

High schoolers need to be better prepared, experts say

BY CECILIA LE
THE NEWS JOURNAL
06/26/2006

Delaware's high school students will face some of the toughest graduation requirements in the nation, if the state adopts a pending recommendation for new, more rigorous standards.

A state committee last week recommended the state require an extra credit of math, two credits of foreign language, a tougher senior year and specific courses students must take, such as biology, chemistry and algebra II.

The changes, which would take effect with the graduating class of 2011, would increase the number of required credits from 22 to 24. Currently, only four states require 24 credits to graduate. Three states require a low of 13.

The proposal stems from nationwide pressure from the business community and education groups, who say America's high schools must demand more of graduates if they expect to compete in a knowledge-based economy.

"All kids need some level of training beyond high school to get a job that will support a family," said Paul Herdman, president of the Rodel Foundation of Delaware, whose mission is to improve the state's schools. "There's no point in keeping standards that we know aren't preparing kids."

But others argue it's unrealistic to put all students on an academically rigorous track, when some could be better served by technical training than trigonometry.

Further, a report last week suggests only 61 percent of Delaware's ninth-graders graduate in four years. Such sobering news leads some to question the wisdom of making a diploma even harder to attain.

Natasha Mullen, a counselor and mother of four who leads a parents group supporting the education of black students in Seaford, said just increasing requirements won't solve the

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THE NEWS JOURNAL/CARLA VARISCO
Shivani Sharma (left), 15, and Sindhu Siva, 15, perform a quality control experiment at a camp at Delaware Technical & Community College's Stanton campus on Wednesday.

> Special report
The State of Our Schools



Kate Saltz

Gregory Gavins

problem.

... would much rather see more support available for the courses they're already taking," Mullen said.

"I don't necessarily disagree with increasing the demand, but it's part of this larger attitude that every child thinks and works and does things alike, and that is not true," she continued.

'You forget what you learned'

Only eight states require students to complete a level of coursework that indicates they're ready for college or work, according to Achieve, a group of governors and business leaders that seeks to increase the rigor of high school education.

If Delaware adopts the current proposal, it would become one of those states, Achieve President Michael Cohen said. The requirements would prepare students well to get into Delaware State University or the University of Delaware -- or get hired on the job site.

"Before it began its current work, Delaware was a classic example of a state that didn't require a lot and sent very poor signals to students about what they needed to know," Cohen said.

...mani Morgan, who will be a sophomore at William Penn High School in the fall, believes it makes sense to require foreign language and math in the senior year.

"The last year, you have 'senior-itis' and you forget what you learned," she said. "The next year, you're going to college and that's when you're going to need to know math."

"[Taking a language] is not going to be that hard and the Hispanic population is rising," Morgan said. "You're going to need it unless you're going into a field where you're not going to need to talk to anybody."

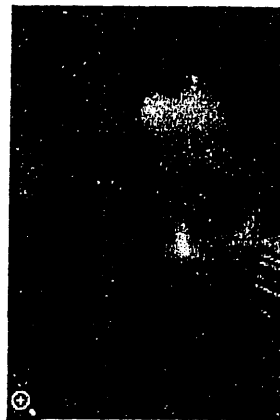
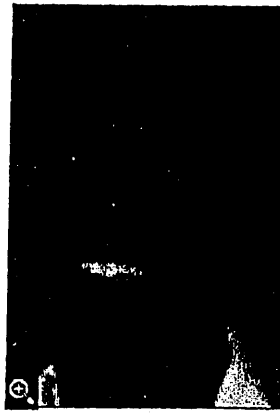
The state teachers' union, while supportive of the majority of the proposal, questions requiring foreign language for all students.

Those with disabilities or those not college-bound, the union suggested, might benefit more from an extra year of science, social studies or career preparation.

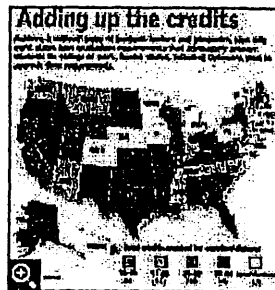
Cohen, of Achieve, argues the skill set required to enter college differs little from that needed to go straight to work.

In today's economy, he said, few of the well-paying unskilled jobs older generations took for granted still exist.

Jobs requiring little education in the manufacturing, steel and auto industries have been eliminated by increasingly sophisticated



Kaylin Young



GRADUATION REQUIREMENTS

NOW: 22 credits

RECOMMENDED: 24 credits

NOW: Four credits in English language arts.

RECOMMENDED: Four credits in English language arts with an emphasis on reading, literature, writing, presentation and communication skills, reasoning, logic and technical writing.

NOW: Three credits in math.

RECOMMENDED: Four credits in math, including skills equivalent to at least Algebra II. One math credit must be taken in the student's

technology.

Traditionally blue-collar vocations such as construction, plumbing, electrical work and carpentry now require a knowledge of algebra and geometry.

"You need mainly the same set of skills if you're going to a [four-year college], two-year technical training program or an apprenticeship program," Cohen said.

Jobs require more education

When Domonique Carter was a senior at Mount Pleasant High School, she took a full course load, including advanced placement European history, anatomy and physiology and French -- but not math, which she didn't think she would need beyond Algebra II.

Carter, now a senior psychology major at the University of Delaware, has changed her mind.

"I kind of wish I had known that because the statistics class I'm taking now is really difficult," she said. "A lot of jobs are requiring a lot more education they didn't require before."

"We need to take four years of math," said Sindhu Siva, a Charter School of Wilmington junior who will take calculus next year. "I think it's a step forward. When you think of the global market, the U.S. isn't keeping up."

Students who opt for an easy senior year are depriving themselves of education at a crucial point in their lives, said University of Delaware Admissions Director Louis Hirsh, who served on the committee recommending tougher requirements.

He compared such students to varsity athletes who neglect to practice or play in their senior year, then expect to join the college team.

"There was a significant number of students who were not able to gain admission to the Newark campus this year precisely because their senior year was so weak," Hirsh said.

Delaware's education officials acknowledge that raising expectations will not work without also increasing support for students.

By 2010, Delaware plans to develop an individual learning plan for every high school student. The first such plans will be piloted in several high schools this fall.

"If the kid has a road map and the family and student and school work together on that plan, they have a greater likelihood of being successful than if we just kind of leave it to chance," state Secretary of Education Valerie Woodruff said.

senior year.

NOW: Three credits in science.

RECOMMENDED: Three credits in laboratory science, including skills equivalent to physical/earth science, chemistry and biology.

NOW: Three credits in social studies.

RECOMMENDED: Three credits in social studies, including skills encompassing the core areas of history, geography, civics and economics.

NOW: No foreign language requirement.

RECOMMENDED: Two credits of world language.

Unchanged are requirements to take one credit in physical education, half a credit in health, three credits in a career pathway and three and a half elective credits.

WHAT STUDENTS ARE SAYING

KATE SALTZ

SCHOOL: Newark High School, Class of 2006

AGE: 17

FUTURE PLANS: Will attend Virginia Tech to major in biological sciences and philosophy

Kate Saltz took Advanced Placement psychology, AP English, AP calculus, AP physics and honors Spanish during her senior year. She also was editor of the yearbook, ran cross country, played lacrosse and was a member of the National Honor Society, the Spanish National Honor Society and the Key Club.

All that despite having earned most of the credits needed to graduate before entering the 12th grade.

She could have opted for fewer classes and the chance to end her days early, but Saltz said her mom and teachers encouraged her to enroll in a full day. She's glad she did because she was able to take AP courses to better prepare her for college in the fall.

Although she took more classes than were required to receive her degree, Saltz doesn't agree with adding more courses to the diploma requirements. The advanced science and math courses she took are not for everyone, she said, and shouldn't be required for people who are not interested in the fields.

"When I first started taking biology, it's how I knew I wanted to take AP biology, but that's not for everyone," she said.

However, Saltz thinks requiring students to take a broad range of coursework is necessary because some students discover new interests only after taking a required course.

GREGORY GAVINS

SCHOOL: Christian High School, Class of 2006

AGE: 21

FUTURE PLANS: Training with Job Corp for a business field

Other ways in which the state will help students include online and evening classes.

"I don't think the answer is to keep a lower standard just because we don't want to increase the dropout rate," said Herdman, of the Rodel Foundation. "If they graduate unprepared, it's not doing them a service."

Gregory Gavins took a full schedule until he graduated in May, but now he wishes he hadn't taken so many courses his senior year.

He took English, math, history, a college-prep study-skills course and electives. He also studied martial arts and worked in the sales department for an independent contractor.

Some days, he said he would leave school early, missing class, to go to work. He said work better prepared him for the business world.

Gavins said additional requirements will not meet the needs of every student.

For example, he doesn't think students not interested in math-related fields should have to take an additional math class.

KAYLIN YOUNG

SCHOOL: Newark High School, Class of 2006

AGE: 17

FUTURE PLANS: Will attend St. Andrew's Presbyterian College in North Carolina to major in biological science

As a senior, honor student Kaylin Young opted to leave school early everyday to work at a sandwich shop. During her abbreviated school days, she took Advanced Placement English, AP calculus, AP physics, computer applications and chamber choir.

Young -- who also was a member of the National Honor Society, the French National Honor Society and the Key Club -- said working 20 to 25 hours a week was more educational than taking more classes because it taught her to interact with people.

Even with a lighter schedule her senior year, Young's cumulative credits fulfilled the proposed 24-credit graduation requirement.

She doesn't think requiring more courses will benefit students.

"It should be based on your major," Young said. "If you're not going to be a science major you shouldn't have to take extra science. If you're going to be a history major you should take an extra history."



<http://www.delawareonline.com/apps/pbcs.dll/article?AID=/20060621/NEWS03/606210348/1008>

Del.'s graduation rate among worst in U.S.

Districts dispute report that ranks state 44th

BY CECILIA LE
THE NEWS JOURNAL
06/21/2006

Only 61 percent of Delaware public school students graduate high school in four years, according to a new report from the Editorial Projects In Education Research Center.

The estimate is lower than even those of various other education think tanks that have been chastising states for reporting inflated graduation rates.

EPE's "Diplomas Count" report, released Tuesday, ranks Delaware 44th in the nation for producing high school graduates. State education officials, meanwhile, use a different formula that concludes 82 percent of students are graduating.

"The majority of states use a method that incorporates dropout data, and that's going to tend to inflate their graduation rates," said Christopher Swanson, director of the EPE Research Center. "For one The center's findings, he said, point to a problem with enormous social and economic implications.

The report calculates 70 percent of students nationwide graduate in four years.

Editorial Projects in Education, a nonprofit organization based in Bethesda, Md., publishes the journals Education Week and Teacher Magazine.

The center's district-level analysis shows fewer than half of students in the Seaford and Lake Forest districts are graduating. It found no district in Delaware graduating more than 80 percent of students in four years.

State data, meanwhile, indicates 80 percent of Lake Forest students and 76 percent of Seaford students are graduating.

"I won't say we're 100 [percent] accurate, but based on the methodology we use, it is as accurate as it can be," state Secretary of Education Valerie Woodruff said.

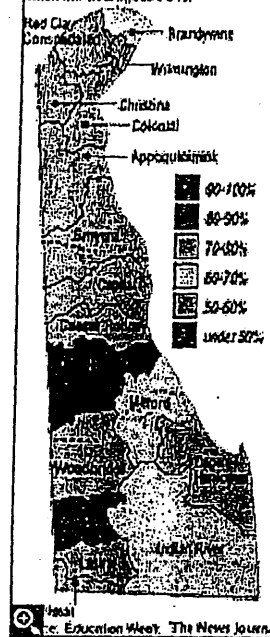
Whichever number is used, Woodruff said, Delaware's graduation rate is not good enough.

"We're not meeting the needs of a number of kids, and as a result, a number are leaving high school before they should," she said.

One social services provider said he doesn't find it hard to believe that two of five students could be leaving high school.

School district graduation rates

The Editorial Projects in Education Research Center estimates Delaware's graduation rate is at 60.7%, while the national average is 70%.



Who graduates in Delaware?

- 67% of white students
- 48% of black students
- 43% of Hispanic students
- 66% of girls
- 56% of boys

Source: Editorial Projects in Education Research

no shock to me," said Arthur Boswell, executive director of the Neighborhood House, based in Wilmington's Southbridge.

"It's a crisis. There's no better word that I know. A lot of kids are just quitting and walking away. We see a lot of kids without the skills to be employable and it contributes to a whole range of social ills -- rates of drug use, premature sexual activity, low birth weight."

Boswell has been tracking the progress of Southbridge's children through their schools.

"We're hard-pressed to follow kids from eighth to 12th grade and see a quarter of them graduating," he said. "Clearly they're losing kids, and they're losing them at a much heavier rate than the 82 percent the state lists."

EPE's findings show 67 percent of white students in Delaware graduate, compared with 48 percent of black students and 43 percent of Hispanic students. A gender gap is also present in Delaware and nationwide: 66 percent of girls graduate, as opposed to 56 percent of boys.

The report shows the majority of dropouts leave between ninth and 10th grade -- a period when students are adjusting to adolescence, tougher coursework and a more impersonal school setting.

To remedy the dropout problem, schools are offering "ninth-grade academies" to help kids transition to high school as well as online and evening classes. Part of the focus is on improving literacy so students digest denser and more complex work.

While, school districts call EPE's numbers inaccurate. Lake Forest Superintendent Daniel Curry said his district's dropout rate has declined significantly since 2002-03, the year from which EPE got its data.

"Numbers from '02-'03 are basically irrelevant," Curry said.

James VanSciver, Seaford's director of secondary education, said the state's numbers, which indicate 76 percent of his students graduate, are more accurate than EPE's estimate.

"We stand behind our figures," he said. "You can get the statistics to say whatever you want. It's a slap at people trying to do real hard work with a student population with significant challenges."

Seaford's dropout-prevention efforts include a drive to enroll more students in advanced classes, summer math classes that give middle-schoolers a leg up, and a Saturday academy starting in fall that will target black male students.

Delaware education officials also take issue with EPE's caveat that students must graduate within four years to count.

"If you save a dropout and keep him in school, you get punished on the other end for the graduation rate because he didn't finish in four years," Curry said. "If we get him going to night classes and help him finish in five years, let's all celebrate that and let's not apologize for it."

View the report at www.edweek.org/dc06.

Contact Cecilia Le at 324-2794 or cle@delawareonline.com.
