



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

Ms. Susan K. Haberstroh, Ed.D.
Department of Education
35 Commerce Way – Suite 1
Dover, DE 19904

RE: DOE Proposed Specialist Appraisal Regulation [17 DE Reg. 1018
(5/1/14)]

Dear Ms. Haberstroh:

The State Council for Persons with Disabilities (SCPD) has reviewed the Department of Education's (DOE's) proposal to amend the Specialist Appraisal Process Delaware Performance Appraisal System (DPAS II) Revised published as 17 DE Reg. 1018 in the May 1, 2014 issue of the Register of Regulations. SCPD has the following observations on the revisions.

First, in §2.0, definition of "Student Achievement", the term "Students scores" is not grammatically correct. Substitute "Students' scores" or, for consistency with Pars. (b) and (c), "Student scores".

Second, in their commentary on the June 2013 regulation, the Council expressed concern with an authorization for districts and charter schools to waive/disregard some appraisal components. Proposed §5.1 expands this approach by authorizing districts and charter schools to apply for approval of an alternate Professional Responsibilities Component. SCPD objects to this approach which undermines uniformity in the specialist appraisal process and vitiates valid comparisons of data across districts and schools. Section 11.0 contemplates presentation of statewide data on the specialist appraisal process to the SBE annually. Moreover, the DOE publishes results of the assessment system now whose usefulness would be undermined by use of disparate standards across districts and schools. Cf. pp. 21-22 of DOE report covering DCAS II teacher results [Educator Effectiveness in Delaware: Recruitment to Retention (February, 2014)] published at http://www.doe.k12.de.us/tleu_files/From_Recruitment_to_Retention_Data_2-28-14.pdf.

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 Murphy, Secretary of Education
Dr. Donna Mitchell, Professional Standards Board
Dr. Teri Quinn Gray, State Board of Education
Ms. Mary Ann Mieczkowski
Ms. Paula Fontello, Esq.
Ms. Terry Hickey, Esq.
Ms. Ilona Kirshon, Esq.
Mr. Brian Hartman, Esq.
Developmental Disabilities Council
Governor's Advisory Council for Exceptional Citizens

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