



STATE OF DELAWARE
STATE COUNCIL FOR PERSONS WITH DISABILITIES
Margaret M. O'Neill Bldg., Suite 1, Room 311
410 Federal Street
Dover, Delaware 19901
302-739-3621

The Honorable John Carney
Governor

John McNeal
SCPD Director

April 29, 2022

The Honorable Mark A. Holodick
Department of Education
Office of the Secretary
Attn: Regulation Review
401 Federal Street, Suite 2
Dover, Delaware 19901

RE: Proposed DDOE Regulation on 1581 School Reading Specialist, 25 Del.
Register of Regulations 934 (April 1, 2022)

The State Council for Persons with Disabilities (SCPD) has reviewed the Delaware Department of Education's ("DDOE") proposed regulation to amend 14 Del. Admin. C. § 1581, which describes the requirements for obtaining the School Reading Specialist standard certificate (hereinafter "Certificate") pursuant to 14 Del. C. § 1220. DDOE, in cooperation with the Professional Standards Board (hereinafter "Board"), is proposing to amend this regulation. The proposed regulations were published as 25 DE Reg. 934 in April 1, 2022 issue of the Register of Regulations. SCPD endorses the proposed regulations, subject to recommendations, and has the following observations.

The proposed regulations have been published several times. This most recent iteration of the proposed amendments is identical to those that were previously published except for the following changes:

1. Revising the definition for "Valid and Current License or Certificate" in Section 2.0 to clarify that it is referring to an educator's license or certificate;

2. Removing the prior proposed section on reciprocity and revising the requirements for the same in Section 3.0;
3. Revising subsection 4.1.1.1 to clarify the requirements and add the IDA standards as an option;
4. Revising the course title in subsection 4.1.1.1.2.5;
5. Moving the section concerning the Secretary of Education review to Section 6.0 and renumbering the subsequent sections concerning validity and disciplinary actions; and
6. Adding Section 10.0, which concerns applicants' and Educators' contact information with the Department and specifies how they can change their name or address.

Given that SCPD has already submitted comments on much of the proposed amendments to this regulation, Council is only focusing on those proposed changes which are new and relevant in this most recent iteration.

The first proposed change is to the definition of “Valid and Current License or Certificate” in Section 2.0. The definition proposed is “...a current full or permanent certificate or license as an educator issued by another state or jurisdiction. This means the applicant is fully credentialed by having met all of the requirements for full licensure or certification as an educator in another state or jurisdiction and is in good standing in that state or jurisdiction. The words “as an educator” were added to clarify that it referred to an educator license or certificate. It also refers then to the individual as an “applicant” rather than an “educator” as was the language in the prior proposed regulations over the course of the past several years. This clarification is helpful; however, as just noted, it makes this definition different than every other definition for this same term that has been more recently proposed and adopted by the State Board of Education¹. SCPD recommends that the definition for the term remain consistent with the prior adopted definitions rather than this new proposed alternative.

The second proposed change involves the language around reciprocity, specifically proposed 1581.3.1.2. The original proposed language, which is consistent with the other language in the series, is “Has met the requirements for licensure and holds a Valid and Current License or Certificate...” The new proposed language is “Has met the requirements for an educator's license in Delaware and presents proof of a Valid and Current License or Certificate as a Reading Specialist issued by another state or jurisdiction...” (emphasis are the new changes). SCPD recommends that

¹ See 14 Del. Admin. C. § 1571.2.0 as an example. The updates to 1571 were adopted and went into effect on July 1, 2020.

this section be consistent with the other proposed and adopted regulations in this series.

The third proposed change separates the requirements for a Certificate into three categories instead of two and adds an option for the completion of graduate-level credit hours aligned to IDA standards.² This is a needed change which helps understand the requirements more clearly. Specifically, it separates the requirements for an applicant who has completed a bachelor's degree from an applicant who has completed a master's degree in any content area. SCPD notes that the addition of the option for completing courses aligned with the IDA Standards was a request put forth by other stakeholders in prior submissions to the Register. The Board held at least two public meetings and sought information on both IDA and ILA standards. If this proposed change were to be adopted, and the higher education institutions in Delaware were to seek IDA accreditation, it would join at least twelve other states with at least one program with IDA accreditation.³

The fourth proposed change relates to the revision of a specific course title. Proposed 4.1.1.1.2.5 has changed the course title of "Teaching English as a Second Language (3 credits)" to "Teaching diverse reading profiles, including teaching English as a Second Language (three credits)." Two comments have already been submitted regarding this change. The first by eleven (11) faculty members of the School of Education at the University of Delaware⁴ and the second by Kathryn Brown, the Chair for Reading and English as a Second Language ("ESL") programs at Wilmington University.⁵ Both comments are in opposition to the proposed change because it is redundant with other course work, inadequate to address the needs of ESL students, and seems to treat ESL students as one single profile within many other profiles rather than giving educators the time and attention necessary to learn effective instructional practices for this diverse group of learners. SCPD echoes the sentiments provided in these two comments and recommends that this proposed change not be adopted.

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

² <https://app.box.com/s/21gdk2k1p3bnagdfz1xy0v98j5yt11wk>

³ <https://dyslexiaida.org/university-programs-accredited-by-ida/>. It is unclear when this page was last updated, so it is possible that this number is much higher.

⁴ <https://www.doe.k12.de.us/cms/lib/DE01922744/Centricity/Domain/89/Reg1581%20UDComment.pdf>.

⁵ <https://www.doe.k12.de.us/cms/lib/DE01922744/Centricity/Domain/89/1581%20Brown%20Wilm%20U%20Comment.pdf>.

Sincerely,



Terri Hancharick, Chairperson
State Council for Persons with Disabilities

cc: The Honorable Susan Bunting, Department of Education
Mary Ann Mieczkowski, Department of Education
Linnea Bradshaw - Executive Director of the PSB
Tracy Poitras - PSB
Kathleen Smith - Professional Standards Board
Laura Makransky, Esq. - Department of Justice
Valerie Dunkle, Esq. - Department of Justice
Whitney Sweeney, SBE
Laura Waterland, Esq.
Governor's Advisory Council for Exceptional Citizens
Developmental Disabilities Council