



STATE OF DELAWARE
STATE COUNCIL FOR PERSONS WITH DISABILITIES
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The Honorable John Carney,
Governor

John McNeal, Director
SCPD

MEMORANDUM

DATE: October 25, 2023

TO: Department of Education, Office of the Secretary, Attn: Regulation Review

FROM: Benjamin Shrader, Chairperson 
State Council for Persons with Disabilities

RE: **PROPOSED DDOE REGULATION AMENDING 14 DE ADMIN. CODE
1517 PARAEDUCATOR PERMIT, 27 DEL. REGISTER OF
REGULATIONS 230 (OCTOBER 1, 2023)**

The State Council for Persons with Disabilities (SCPD) has reviewed the Delaware Department of Education's proposal to amend 14 DE Administration Code 1517, which relates to Paraeducator Permits. This proposed regulation was published as 27 DE Reg. 230 in the October 1, 2023 Register of Regulations.

The SCPD has the following comments:

- This legislation will see that individuals with ABAT or RBT certificates have been provided with relevant training that is more substantial than other existing alternatives to paraprofessional licensure (for example, individuals with these certificates have more specific training, observation, and hands on experience with students than applicants who qualify for paraprofessional licensure with a high school diploma and a passing score on the ParaPro assessment, an existing avenue to licensure).
- The alternatives remove some obstacles to entry to paraprofessional licensure classrooms while maintaining standards of training and preparation, which in turn could contribute to getting staff in classrooms.
- Similarly, expanding the opportunities for continuing education lowers the burden of recertification, allowing experienced paraprofessionals to use hours spent in professional learning communities and mentoring roles or in developing curriculum and materials

toward recertification continuing education credit. These changes reward experienced and skilled paraprofessionals and contribute toward learning and innovation in the field.

The SCPD supports the proposed changes as they offer additional alternatives for paraeducator licensure and continued education to help address the shortage of necessary paraprofessionals in schools.¹

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

cc: Ms. Marissa Band, Esquire CLASI, DLP
Governor's Advisory Council for Exceptional Citizens
Developmental Disabilities Council

¹ See: Heather L. Schwartz, Melissa Kay Diliberti, *Flux in the Educator Labor Market: Acute Staff Shortages and Projected Superintendent Departures, Selected Findings from the Fourth American School District Panel Survey*, RAND (2022).
https://www.rand.org/pubs/research_reports/RRA956-9.html; Mark Lieberman, *Staff Shortages in School are Here to Stay. Here's Why*, EDWEEK, <https://www.edweek.org/leadership/staff-shortages-in-schools-are-here-to-stay-heres-why/2023/08>