



STATE OF DELAWARE
STATE COUNCIL FOR PERSONS WITH DISABILITIES
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May 31, 2011

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

RE: 14 DE Reg. 1155 [DOE High School Graduation & Diploma Regulation]

Dear Ms. Haberstroh:

The State Council for Persons with Disabilities (SCPD) has reviewed the Department of Education's (DOE's) proposal to adopt several amendments to its high school graduation and diploma standards. There are three (3) sets of standards, i.e. those covering the graduation classes of 2011-2014, those covering the graduation class of 2015, and those covering the graduation class of 2016. The proposed regulation was published as 14 DE Reg. 1155 in the May 1, 2011 issue of the Register of Regulations. SCPD has the following observations.

First, as a practical matter, §3.0 only covers the graduation class of 2015. Section 4.0 covers the graduation class of 2016 and beyond. Therefore, the DOE could consider deleting references to "beginning with" and substituting "for". This would result in the following title: "Credit Requirements for the Graduation Class of 2015 (Freshman Class of 2011-2012)". Section 3.1 would then read: "~~Beginning with~~ For the graduating class of 2015 ...". Compare the title to §2.0 which refers to "Credit Requirements for the Graduation Class of 2011..."

Second, for similar reasons, consider amending §2.1 to read: "~~Beginning with~~ For the graduating class..."

Third, §§3.2.2 and 4.2.2 are problematic in the context of American Sign Language (ASL). They refer to "the skill areas of speaking, reading and writing". The reference to "speaking" may not be quite accurate in the context of ASL. Consider the following substitute: "oral or signed expressive and receptive communication, reading and writing". Apart from more appropriately covering ASL, the advantage to the substitute language is that "speaking" does not literally "capture" understanding what others are saying (e.g.

“incoming” speech). Alternatively, the DOE could consult Statewide Programs for the Deaf, Hard of Hearing and Deaf/Blind for technical advice in the context of this section.

Thank you for your consideration and please contact SCPD if you have any questions or comments regarding our position or 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.
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Mr. Brian Hartman, Esq.
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