



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

Mr. Charlie Michels, Executive Director  
Professional Standards Board  
Townsend Building  
401 Federal Street  
Dover, DE 19901

RE: 14 DE Reg. 1187 [DOE Proposed Professional Development Standards]

Dear Mr. Michels:

The State Council for Persons with Disabilities (SCPD) has reviewed the Professional Standards Board's [in collaboration with the Department of Education (DOE)] proposal to adopt a new regulation (Part 1598) establishing professional development standards. The expressed rationale for adoption is twofold: 1) to establish State-wide expectations for professional development; and 2) to meet one of many Delaware Race To the Top pledges. The proposed regulation was published as 14 DE Reg. 1187 in the May 1, 2011 issue of the Register of Regulations. SCPD endorses the proposed regulation subject to the following amendments.

First, it is unclear if the regulation is intended to cover charter schools. There are no explicit references to "charter schools" or "public schools" and references to "district" (§§2.1.1 and 2.1.2) could be construed as limiting. The Professional Standards Board enjoys statutory authority to apply its standards to charter schools. See Title 14 Del.C. §1202. Moreover, the analogous teaching standards regulation contains an explicit recital of its application to charter schools:

*1597 Delaware Professional Teaching Standards*

*1.0 Content*

*The Delaware Professional Teaching Standards establish a common set of knowledge, skills, and attributes expected of Delaware teachers. In accordance with 14 Del.C. §1205, this regulation shall be applied to all teachers employed within the public schools and charter schools of the State of Delaware.*

[emphasis supplied]

It would be preferable to include a comparable recital in the new Part 1598 regulation.

Second, there are multiple ostensibly “odd” references to “adult” and “adults”. See, e.g., §§2.1.1, 3.1.3 and 3.1.1. SCPD recommends substituting “educator” and “educators” which is the term used in §§1.0, 3.1.3, 3.1.6, 4.1.1, 4.1.2, and 4.1.3.

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  
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Ms. Martha Toomey  
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