



STATE OF DELAWARE
STATE COUNCIL FOR PERSONS WITH DISABILITIES
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February 24, 2011

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

RE: 14 DE Reg. 765 [DOE Proposed World Language Teacher Certification
Regulation]

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 amend its World Language teacher certification regulation published as 14 DE Reg. 765 in the February 1, 2011 issue of the Register of Regulations. The Synopsis of the regulation states the following: "It is necessary to amend this regulation to allow for the certification of American Sign Language and other World Language teachers for whom the typical examination of content knowledge may not be applicable and available." SCPD has the following observations.

First, the regulation literally only contains standards for teachers holding a certificate issued prior to August 31, 2003. See §3.1. There are no standards covering teachers with a certificate issued on or after August 31, 2003.

Second, the qualifications for a World Language teacher certificate may be somewhat anemic. For example, if an ACTFL test is not available, a teacher can be certified in a World Language with only 15 credits in the specific World Language (§4.1.2). This is ostensibly a weak proficiency standard. If an ACTFL test is available, proficiency is based on achieving either "Advanced Low Level" or "Intermediate High Level" scores. It is unclear if these standards reflect sufficient proficiency to serve as a professional instructor in the World Language.

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 Lillian Lowery
Dr. Teri Quinn Gray
Ms. Martha Toomey
Ms. Paula Fontello, Esq.
Ms. Terry Hickey, Esq.
Mr. John Hindman, Esq.
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Developmental Disabilities Council
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