December 22, 2011

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

RE: 15 DE Reg. 718 [DOE Proposed Career & Tech Education Programs Regulation]

Dear Ms. Haberstroh:

The State Council for Persons with Disabilities (SCPD) has reviewed the Department of Education’s (DOE’s) proposal to amend its regulations to add the Health Occupations Students of America (HOSA) as a recognized student career and technical student organization, and delete the ability for the local school district or charter school to have programs that are not based on the content standards of the state. The proposed regulation was published as 15 DE Reg. 718 in the December 1, 2011 issue of the Register of Regulations.

SCPD endorses the proposed regulation since it is essentially a “housekeeping” measure. First, the current regulation (§2.12) lists several student organizations “which provide hands on and practical experience and are helpful in improving student achievement as measured against the state achievement standards.” The DOE is amending the list to add one additional student organization, the “Health Occupations Students of America (HOSA)”. Second, the current regulation authorizes use of local program standards if “there are no approved state content standards” (§1.0). Since there are State-approved content standards, the reference is no longer apt.

Thank you for your consideration and please contact SCPD if you have any questions or comments regarding our position 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. Mary Ann Mieczkowski
    Ms. Paula Fontello, Esq.
    Ms. Terry Hickey, Esq.
    Mr. John Hindman, Esq.
    Mr. Charlie Michels
    Mr. Brian Hartman, Esq.
    Developmental Disabilities Council
    Governor’s Advisory Council for Exceptional Citizens

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