



STATE OF DELAWARE
STATE COUNCIL FOR PERSONS WITH DISABILITIES

MARGARET M. O'NEILL BUILDING
410 FEDERAL STREET, SUITE 1
DOVER, DE 19901

VOICE: (302) 739-3620
TTY/TDD: (302) 739-3699
FAX: (302) 739-6704

January 30, 2014

Ms. Susan K. Haberstroh, Ed.D.
Department of Education
35 Commerce Way – Suite 1
Dover, DE 19904

RE: DOE Proposed Curricula Alignment with State Content Standards Regulation [17 DE Reg. 679 (1/1/14)]

Dear Ms. Haberstroh:

The State Council for Persons with Disabilities (SCPD) has reviewed the Department of Education's (DOE's) proposal to revise its *Alignment of School District Curricula with State Content Standards* regulation published as 17 DE Reg. 679 in the January 1, 2014 issue of the Register of Regulations. The rationale is as follows:

The amendments reflect process changes related to the demonstration of alignment of local school district curricula to the state content standards. This reduces the burden on the districts as well as the Department and also provides for flexibility based on the uniqueness of each district related to the development of local curricula.

At 680.

The current regulation is very prescriptive in defining the documentation that districts must submit to prove alignment of their curricula with State content standards. See §6.0. The proposed standards are less prescriptive and rigorous. Section 4.2 recites as follows:

4.2. Documentation of alignment of school district curricula shall include: unit plans, lesson plans, and assessments; and may be subject to Department review during on-site monitoring visits. Included in the documentation shall be a description of the method and level of involvement in the alignment process by building administrators, teachers and specialists.

SCPD has the following observations on the proposed regulation.

First, the proposed regulation contains the following provision covering special populations, including students with disabilities:

5.0. Documentation for Specific Student Populations

As part of its documentation, the district shall explain modifications or enhancements to curricula for specific subgroups such as students with disabilities, gifted students, English learners or any other special population of students and certify alignment to the State Content Standards.

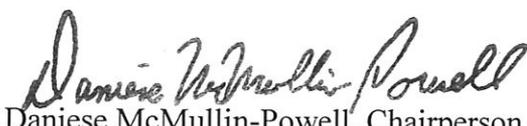
This is a variation on current §6.2.1. SCPD endorses its retention in the regulation.

Second, in §2.0, definition of “Evidence”, there is a plural pronoun (“their”) with a singular antecedent (“district”). SCPD recommends substituting “its” for “their”.

Third, the Department’s standards have arguably “morphed” from one extreme to the other. The current standards include more specific and more objective criteria based on assessments and data. For example, §6.1.1 requires an analysis of “disaggregated student performance data on state assessments over the most recent three year period.” Section 6.1 requires documentation of alignment by grade clusters, i.e., K-2, 3-5, etc. This concept is absent from the proposed regulation. Section 6.1.2 contemplates completion of a survey process [“Survey of Enacted Curriculum (SEC)] sponsored by the Council of Chief State School Officers resulting in an objective Alignment Index of .50 or higher. The Department may wish to consider whether its proposed criteria are simply too general.

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 Mark Murphy, Secretary of Education
Dr. Donna Mitchell, Professional Standards Board
Dr. Teri Quinn Gray, State Board of Education
Ms. Mary Ann Mieczkowski
Ms. Paula Fontello, Esq.
Ms. Terry Hickey, Esq.
Ms. Ilona Kirshon, Esq.
Mr. Brian Hartman, Esq.
Developmental Disabilities Council
Governor’s Advisory Council for Exceptional Citizens

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