



STATE OF DELAWARE  
**STATE COUNCIL FOR PERSONS WITH DISABILITIES**  
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May 25, 2016

Mr. Chris Kenton, Executive Director  
Professional Standards Board  
Townsend Building  
401 Federal Street – Suite 2  
Dover, DE 19901

RE: 19 DE Reg. 979 [PSB Proposed School Nurse Regulation (5/1/16)]


Dear Mr. Kenton:

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 some discrete revisions to its school nurse standards. The rationale is as follows: "This regulation requires some formatting changes to conform to other Standard Certificates and the updating of certification requirements." At 979. The proposed regulation was published as 19 DE Reg. 979 in the May 1, 2016 issue of the Register of Regulations. SCPD has the following observation.

The Department may wish to reconsider §6.2. That section requires public schools to be responsible "for verifying that the School Nurse continues to meet the requirements" in certain subsections. The reference to §4.1.1 seems inapt since a nurse will not "lose" a degree. On the other hand, it may be logical to include a reference to §4.1.4 since the 90 hours of mandatory training would occur subsequent to hiring. Therefore, the DOE could consider substituting "subsections 4.1.2 through 4.1.4" for "subsections 4.1.1 through 4.1.3" in §6.2.

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 Steven Godowsky, Ed.D, Secretary of Education  
Ms. Tina Shockley, Department of Education  
Dr. Teri Quinn Gray, State Board of Education  
Ms. Mary Ann Mieczkowski, Department of Education  
Ms. Laura Makransky, Esq., Department of Justice  
Ms. Terry Hickey, Esq., Department of Justice  
Ms. Valerie Dunkle, Esq., Department of Justice  
Mr. Brian Hartman, Esq.  
Developmental Disabilities Council  
Governor's Advisory Council for Exceptional Citizens

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