



STATE OF DELAWARE
STATE COUNCIL FOR PERSONS WITH DISABILITIES
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July 2, 2012

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

RE: 15 DE Reg. 1665 [DOE Proposed Early Childhood Teacher 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 adopt revised certification standards for early childhood teachers. The synopsis recites as follows:

It is necessary to amend this regulation in order to facilitate proper and current formatting trends. There are no changes in certification requirements other than clarifying the requirements for those educators who seek this certification as their first Standard Certificate and those adding this Standard Certificate to one or more previously issued on their license.

The proposed regulation was published as 15 DE Reg. 1665 in the June 1, 2012 issue of the Register of Regulations.

SCPD only identified the following grammatical and formatting concerns.

First, in §4.1.1, insert a comma after "3.1.5.1". A comma is required after a lengthy introductory adverb clause. The comma was properly inserted in §4.1.2 but omitted in §4.1.1.

Second, §§4.1 and 4.2 contain plural pronouns ("their") with singular antecedents ("the educator"). The error is easily corrected by substituting "a" for "their" with no loss of meaning.

Third, there is a lack of punctuation in §§4.1.1.1- 4.1.1.5 and 4.2.1.1 - 4.2.1.5. Consider adding the following:

- A. semicolon after §§4.1.1.1, 4.1.1.2, 4.1.1.3, 4.2.1.1, 4.2.1.2, and 4.2.1.3;
- B. “; and” after §§4.1.1.4 and 4.2.1.4; and
- C. period after §§4.1.1.5 and 4.2.1.5.

SCPD endorses the proposed regulation subject to the Board adopting the above revisions.

Thank you for your consideration and please contact SCPD if you have any questions or comments regarding our position or observations on the proposed regulations.

Sincerely,



Daniese McMullin-Powell, Chairperson
State Council for Persons with Disabilities

cc: The Honorable Mark Murphy
Dr. Teri Quinn Gray
Ms. Mary Ann Mieczkowski
Ms. Paula Fontello, Esq.
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Mr. John Hindman, Esq.
Ms. Susan Haberstroh
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Developmental Disabilities Council
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