

Professional Standards Board
1581 School Reading Specialist Regulations
Public Comment re course change to ESL course

April 13, 2022

Dear PSB members,

As members of the Delaware Governor's Advisory Council on English Learners (GACEL), we write to provide public comment in response to the proposed amendment to the regulations for the requirements for obtaining a Delaware School Reading Specialist certificate (1581). Overall, we do not support the proposed change in coursework from *Teaching English as a Second Language (3 credits)* to *Teaching diverse reading profiles, including teaching English as a Second Language (three credits)*. Below we provide our reasoning.

First, the change seems to have been proposed, voted on, and made to the published regulations without consultation with any experts in working with English learners. According to the National Center for Education Statistics from 2000 to 2018 the population of English learners in Delaware increased from 2,081 students to 13,164 students, an increase from 1.8% to just under 10%. Clearly, English learners comprise a significant portion of the students potentially served by Delaware reading specialists. The GACEL was appointed by the governor and is positioned to provide guidance and support related to decisions impacting English learners within Delaware schools. We urge the Professional Standards Board to reconsider the decision to replace the course in the Reading Specialist regulations related to Teaching English as a Second Language which could negatively impact many Delaware students. GACEL members would gladly engage with the PSB in further discussion around the issue.

Second, although English learners are typically grouped together in one subgroup, they are an incredibly diverse group of students. Acquiring the necessary knowledge and skills to meet the diverse needs of English learners requires extensive time and commitment. Reading specialists must learn about issues related to language acquisition, language proficiency, cross-language transfer, and effective instructional practices and adaptations for students at various language levels. As such, treating English learners as a *single* profile of many within one new course is impractical and severely limits the attention given to the needs of English learners within the Reading Specialist coursework. Therefore, we strongly support the prior regulations which require a full graduate course to adequately address the needs of English learners. Moreover, the proposed change to a course about meeting the needs of students with diverse reading profiles seems to directly relate to the remainder of the courses already detailed in the regulations – courses on assessment and instruction in both reading and writing, a 6-hour practicum, literacy acquisition, and literacy in the content areas. The titles of these courses suggest acquisition of the knowledge and skills needed to meet diverse reading profiles of students.

Finally, within the state of Delaware the role of Reading Specialists often ranges beyond providing direct instruction to students. As leaders in literacy within their schools, Reading Specialists offer instructional coaching to classroom teachers and extensively consult with administrators about design and implementation of classroom literacy instruction. Given this vital role in the Delaware public schools, it is important that both teachers and administrators have access to high-quality information about literacy development, assessment, and instruction for English learners. Therefore, the English as a Second Language course is fundamental in ensuring adequate preparation for Reading Specialists as they fulfill their role in schools.

In sum, the Delaware Governor's Advisory Council on English Learners (GACEL), does not support the proposed change in coursework from *Teaching English as a Second Language (3 credits)* to *Teaching diverse reading profiles, including teaching English as a Second Language (three credits)* within the regulations for the School Reading Specialist certificate (1581) for the reasons described above. If you have questions, please do not hesitate to contact the GACEL co-chair, Javier Torrijos at jtorrijos@torrellc.com.

Sincerely,

GACEL

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