



8/24/2020

To whom it may concern:

On behalf of the Delaware Association of School Psychologists (DASP), we have reviewed the proposed revisions to 14 Del.C. Section 122(d), 922 Children with Disabilities Subpart A, Purposes and Definitions. We are appreciative of the work that went into the revisions to this set of proposed regulations, especially the additional edits that were made as a result of public comment to the previously proposed revision.

We are in favor of the decision to remove the definitions of the various educational classifications from this section. We agree that those definitions make more sense in 925, with each definition preceding the eligibility criteria for the applicable educational classification. We feel that this change is simply more intuitive for eligibility determination teams, and eliminates the issue in the current regulations where the definitions of some of the educational classifications in 922 do not fully align with the eligibility criteria for those same educational classifications in 925.

We would like the Department to consider delaying implementation of these regulatory changes until next school year. Given the many challenges we all face this year due to the pandemic, including the need to rethink even the simplest aspects of our jobs and the effort to remain nimble enough to pivot from one entirely different plan to another at short notice, we are concerned about the additional demand posed by the roll-out of new eligibility regulations.

We appreciate the hard work of the members of the stakeholder group that assisted in the development of the proposed regulations and thank them for their efforts in serving the best interests of all Delaware students. We also thank the Department of Education for consideration of our comments and recommendations.

Sincerely,
The Delaware Association of School Psychologists (DASP)

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