



A GREAT EDUCATION
CHANGES EVERYTHING

April 14, 2025

Members and Staff of the Joint Legislative Oversight and Sunset Committee:

I am writing a letter of support for the Delaware Professional Standards Board. The Professional Standards Board ensures the strength of our educator workforce through licensure and certification requirements. The Board upholds standards for the education profession, engages stakeholders, and conducts thoughtful policy planning and recommendations.

Rodel has partnered with the Board to assess potential policy changes related to literacy, early childhood, data on professionals, child safety, and other issues over the years. We have found the Board to be thoughtful, evidence-based, and practical in their recommendations. They collaborate with the Department of Education, members of the General Assembly, State Board of Education, and other stakeholders.

We look forward to the Board expanding representation of their board to include the geographics and demographics of our state and all public school students, including charter schools. We support the Board's effort to decrease unlicensed practice in the state, including its effort to creating a permitting process to create protections, establish stronger data systems, align job codes, and create a pathway to employment for those unlicensed.

Thank you for your consideration of the Board and how it can be strengthened to better serve our schools, educators, and students.

Sincerely,

A handwritten signature in blue ink that reads "Madeleine Bayard".

Madeleine Bayard
Senior Vice President

Linda S. Zankowsky, Ed.D.

Sussex Montessori School

24960 Dairy Lane

Seaford, DE 19973

302-388-8124

Linda.zankowsky@sussexms.k12.de.us

Linda@montessoriworks.de.org

Joint Legislative Oversight and Sunset Committee

Legislative Hall

411 Legislative Avenue

Dover, DE 19901

Dear Members of the Joint Legislative Oversight and Sunset Committee:

I am writing to express my strong concern about the ongoing existence of the Delaware Professional Standards Board (PSB) for Education and to urge that it be sunset. I serve as Board chair of Montessori Works, whose mission is to expand accessible Montessori education in Delaware, and am the founding board chair of Sussex Montessori School.

While the PSB's original intention to uphold educational standards is understandable, its current structure is hindering progress in our state's education system. Specifically, it restricts the recognition of alternative certifications, such as Montessori, and limits the opportunity for high-quality, innovative educational choices for children.

Throughout my extensive career in education, I have had the privilege of working with Montessori-certified teachers who, despite not being state-certified, were exceptional educators in child-centered independent Montessori schools. These teachers demonstrated a deep commitment to students and used innovative methods that fostered student growth and independence. Sadly, these teachers were only accessible to children whose families could pay to attend the schools they worked in. Our children in public schools should have the same opportunity to benefit from such high-quality, alternative teaching approaches.

I have also had the honor of serving in leadership roles within Delaware's educational system, including as the principal of two traditional public schools and as the head of an independent Montessori school. In these roles, I have seen firsthand the benefits of a diverse teaching staff that includes teachers with alternative certifications. These educators are often well equipped to address the unique needs of students, and their contributions are invaluable. However, the current certification system, which requires Montessori-trained teachers to meet additional state certification requirements for traditional classrooms, creates unnecessary barriers to entry and limits the availability of these highly qualified educators.



Campaign Office | PO Box 802, 135 Second Street | Lewes, DE 19958 | 302-644-0107

Delaware is facing a teacher shortage, and our schools are struggling to meet the growing demands of students. By sunseting the PSB and embracing a more inclusive, flexible certification system, we can open the door to talented educators from diverse backgrounds. This change will not only help address the teacher shortage but will also enhance the quality of education by broadening the teaching approaches available to our students.

I urge you to take swift action in support of sunseting the PSB and advocating for a certification process that truly meets the needs of Delaware's schools and students. It is time to modernize our system and ensure that all qualified educators, regardless of certification background, have the opportunity to contribute to the success of our schools.

Thank you for your consideration and your attention to this important matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "L S Zankowsky".

Linda S. Zankowsky, Ed.D.
Board Member Sussex Montessori School
Board Chair Montessori Works, DE



Department of Education

Townsend Building
401 Federal Street Suite 2
Dover, Delaware 19901-3639
education.delaware.gov

Cynthia Marten
Secretary of Education
302-735-4000
302-739-4654 (fax)

May 1, 2025

Joint Legislative Oversight & Sunset Committee
Legislative Council, Division of Research
411 Legislative Avenue
Dover, DE 19901

Dear JLOSC Members and Division of Research Staff:

The Delaware Department of Education (Department) has received and read the Staff Findings and Recommendations Report of the Joint Legislative Oversight and Sunset Committee's (JLOSC) review of the Professional Standards Board (PSB). The Department thanks the JLOSC staff for their thorough report.

The Department is concerned, however, about Staff Finding and Recommendation #2 which finds that Chapter 12 lacks clarity regarding who issues the final orders in license disciplinary cases and recommends that Chapter 12 be updated to remove all PSB references for hearings and final orders.

The Department disagrees with both the finding that it hires its own hearing officers and the recommendation of the JLOSC that the PSB be removed from the hearing process.

The Department does not have its own hearing officers to handle educator licensing cases, although hearing officers are contracted for different purposes, frequently with specific skill sets (i.e., facility licenses). The process for educator license disciplinary cases is as follows:

- A complaint comes into the Department investigators.
- They investigate. Once complete, the investigators forward to the Department's Deputy Attorney General (DAG) for potential prosecution.
- The Department's DAG either dismisses, recommends a letter of concern, or files a complaint which is sent to the licensee by the Department investigators.
- The licensee has three choices: (1) accept the proposed discipline in the complaint and do nothing, the result will be the discipline will go into effect in 30 days; (2) respond to the Department's DAG and work out a consent agreement. The agreement is then presented to the Secretary of Education for approval. If approved, the proposed discipline goes into effect. If a consent agreement is not approved, the parties can renegotiate or go to hearing; or (3) request a hearing.

- The vast majority of licensees either pick option (1) or (2) above, that is why the PSB receives so few hearings, not because Department has a duplicative hearing process.

The Department agrees with the PSB that educators deserve the right to request a hearing before their peers, a body of subject matter experts. The Department will collaborate with the PSB in the coming weeks to make a thoughtful and informed recommendation to our current process. We want to review our own process as well as learn from other states that have a similar relationship between the Department and a professional standards board.

The Department looks forward to working together with the JLOSC and the PSB to draft these recommendations for legislative changes.

Sincerely,

A handwritten signature in black ink that reads "Cynthia Marten". The script is cursive and fluid, with the first name "Cynthia" being more prominent than the last name "Marten".

Cynthia Marten
Secretary of Education



First State Montessori Academy

Deep Roots, New Branches

I am Courtney Fox. I have been a public school educator for 27 years – with 15 years as a teacher in the Brandywine School District and 12 years as the leader of a charter school, First State Montessori Academy.

I am asking you to please sunset the Professional Standards Board as there are many concerns about their representation and advocacy for education in Delaware.

One of the areas that has been of particular concern is the area of educator certification.

As the 2008 Delaware Teacher of the Year, I have worked with schools all over the state and I feel strongly that we need to have strong educators in every classroom. Every child deserves a great education, in a great school with great teachers. I believe that there are many different ways to get to this outcome. There is no one program that creates an effective educator. I urge this committee to continue to seek additional ways to attract and retain educators in the state of Delaware. I also ask that we look at current barriers and strongly consider how we can be even more inclusive and flexible.

While I believe this is a statewide issue, I would also like to share how this is impacting our school. In order to teach in a classroom at FSMA, teachers need a Montessori certification. In order to obtain this, an educator must have a bachelor's degree and complete a multi-year certification program from an accredited Montessori educator training program. The intensity of these programs is often far more than a traditional pre-service educational college program. This is a great example of a barrier that we could eliminate in order to find incredible educators who have a different path to the classroom. I am happy to share more examples or give more information about different ways we can support strong educators in obtaining their credentials.

I appreciate your consideration and look forward to hearing about the outcomes related to the Professional Standards Board and teacher certification.

Sincerely,

Courtney Fox

April 30, 2025

Request for Change to the Professional Standards Board

Dear Chair Hoffner, Vice Chair Romer, and members of the Joint Legislative Oversight Sunset Committee,

On behalf of 24 charter schools, 19,032 students, and over 2,250 educators and staff we respectfully submit this letter requesting recommended changes to the Professional Standards Board (PSB). While at the beginning the PSB served a worthwhile purpose, that time has since past. In recent years it has proven to be **inefficient, duplicative, exclusionary, and misaligned with Delaware's evolving public education system.**

Today, the PSB operates as an outdated and overlapping body whose operation duplicates functions already managed by the Delaware Department of Education (DDOE). It overlaps with existing Delaware Department of Education (DDOE) and State Board of Education (SBE) functions and actively marginalizes the voices of entire communities, particularly Delaware's public charter schools.

We urge the Sunset Committee to dissolve the PSB and transition its responsibilities to DDOE and/or SBE and take into consideration the beliefs of our community which are outlined within this letter.

The Delaware public education landscape continues to experience increased regulation which exacerbates the teacher shortage. For our charter community this also creates a challenge to the original purpose of charter schools: autonomy and accountability. We are submitting this letter not in isolation, but after years of public comment, legislative collaboration, and engagement that has been largely ignored or rejected by the PSB. We have attempted to work in good faith. We have submitted proposals, attended meetings, engaged in conversations – and still, the outcomes have consistently undermined our voices, limited leadership diversity, and **harmed the very educators and students we serve by exacerbating not only the teacher shortage, but a leader shortage as well.**

In his third Executive Order, Governor Meyer declared his administration's commitment to a government that is ethical, transparent and effective. Section 9 directs the Director of Boards and Commissions to work with state agencies and the legislature to identify boards that are engaged in redundant work, have failed to meet regularly or warrant review. We believe that the Professional Standards Board meets these criteria. It is duplicative, inefficient, and no longer aligned with the needs of our public education system. We believe it is time for this body to be sunset.

We are grateful for your leadership and commitment to accountability and transparency. We would be more than happy to discuss our concerns in more detail and answer any questions you may have.

Sincerely,

Kendall Massett

Executive Director

Executive Summary:

Enclosed is a detailed letter outlining our concerns. If requested, we can also provide letters and public comments we have made over the last three years. We have structured this to reflect both the depth of the problem and the clarity of our proposed solutions, with the same goal we've always had – of ensuring accountability, transparency, and equity for all public-school students and educators in Delaware—regardless of school models.

Section Highlights:

In the **Background and Legislative Intent** section, we outline how the PSB was originally created to serve a narrower function that no longer matches the current education ecosystem – particularly after DDOE's capacity and responsibility has expanded significantly in the last few years.

In **Systemic Inefficiencies and Redundancy**, we highlight the regulatory overlap between the PSB, DDOE, and SBE that leads to delays, wasted time, and unnecessary administrative burden which are funded by the public with very little transparency or accountability.

In **Licensure and Certification Concerns**, we show how the current credentialing system harms and limits qualified individuals from becoming teachers or school leaders, limits leadership pipelines, and how certification does not correlate with student safety or academic outcomes. We are advocating for more **inclusive and outcomes-based certification pathways** – not lower standards, but smarter ones.

We follow with concerns over **Board Representation and Transparency**, where we explain how the current board structure locks out parents, charters, and educators of color from meaningful participation and instead relies on narrow appointment pipelines that reinforce the status quo.

Then we briefly note **Legislative Overreach**, including the practice of offering policy opinions despite lacking the authority to do so.

Finally, we conclude with the **Persistent Bias Against Charter Schools** section which documents a years-long pattern of exclusion, disregard for our public comments, and open bias which include PSB-authored letters opposing legislation, special meetings to discuss opposing charter policies, and statements that imply our schools are unfit simply because they are different than district counterparts.

Our **Proposed Solutions** include the dissolution of the PSB and ask to integrate responsibilities into DDOE/SBE or a complete structural change including changes to composition of the board, the nomination rules, and limitations to its authority.

We respectfully urge the Sunset Committee to recommend structural changes that would eliminate duplication, ensure fair and inclusive representation across **all** public-school types, streamline certification pathways, and honor the legislative intent of Delaware's law.

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Background & Legislative Intent:

Delaware's Professional Standards Board (PSB) was established with the goal of supporting educator quality across the state. However, over time, its role has expanded and become increasingly disconnected from the current needs of public education — especially in relation to public charter schools. As a result, the PSB now actively works against the very educational innovation and flexibility that Delaware law was designed to promote.

Our community has begged to be heard, understood, and allowed to fulfill the intent of the General Assembly when the charter law was written. Delaware's charter school law (Title 14, Chapter 5) was written to create **public schools that are innovative, flexible, and accountable to outcomes** — not bound by the same operational constraints as traditional districts. As stated in Delaware law:

“This chapter is intended to improve student learning; encourage the use of different and innovative or proven school environments and teaching and learning methods; provide parents and students with measures of improved school and student performance and greater opportunities in choosing public schools within and outside their school districts; and to provide for a well-educated community.”

Over the last 28 years, Delaware charter schools have done exactly that. With over 19,000 students enrolled today, charters serve as proof points for innovation, choice, and results — often operating with fewer resources, smaller teams, and more direct accountability.

Unfortunately, the PSB has made it clear — through comments in multiple meetings that they believe charter schools must operate exactly like district counterparts. They have suggested that being a charter school means we have lower standards. Through its actions, regulations, and even public comments, the PSB has shown that it believes charter schools must conform to the same structures and certification pipelines as district schools despite having been created to operate differently.

Instead of working collaboratively with charter leaders and our community, the PSB has acted on an agenda that aims to remove autonomy, restricts leadership diversity, and misrepresents the role of licensure in school safety. Notably, as outlined in multiple public comment letters and legislative hearings, the PSB has:

- Enforced rigid licensure and certification requirements that disproportionately harm second-career and nontraditional leaders.
- Rejected or overridden public comments — including when over 80% opposed a specific regulation (Charter Leader 1596) - twice.
- Opposed legislation such as SB 163 that sought to clarify and preserve charter autonomy.
- Promoted the false narratives that certification alone ensures student safety and positive student outcomes, despite no evidence of correlation between licensure and safety or student outcomes.

These incidents are not isolated. As noted in correspondence, public comment records, and hearing transcripts, PSB members have suggested that “being different lowers standards,” and that charter leaders without traditional licensure are “not real educators.” This is not only inaccurate — it's deeply disrespectful to the thousands of educators and school leaders who have built excellent charter schools across the state, many of whom are nationally recognized for their outcomes and leadership.

The success of our schools proves the model works: flexibility in exchange for accountability. Yet instead of honoring that model, the PSB has attempted to apply a one-size-fits-all regulatory system that ignores our design. This has created an administrative burden and forced us to get legislators to step in to clarify what the law already makes clear.

Most recently, the General Assembly passed SB 311, which required the PSB to work with the Delaware Charter Schools Network and the DDOE to collaboratively develop a new Charter Leader regulation. That regulation was initially developed in good faith — but after months of work, and with no public objection during comment or deliberation, the

PSB refused to send the regulation on to the SBE, modified the regulation by adding a single word that changed the intent, and started the whole process again. When charter leaders raised concerns, their feedback was ignored.

This is not the way effective governance operates. It is not transparent, accountable, or in alignment with the intent of our education laws.

Systemic Inefficiencies & Redundancy

The Professional Standards Board (PSB) creates **an unnecessarily complicated and overlapping regulatory structure** that slows progress and wastes resources. Its responsibilities increasingly duplicate the work already being done by the **Delaware Department of Education (DDOE)** and the **State Board of Education (SBE)** — creating an inefficient web of authority over educator licensure and certification.

In both the self and staff report, it is noted that **a good amount of the actual certification work is done by DDOE staff**, not the PSB board itself. Meanwhile, other major initiatives related to educator development — including educator compensation, working conditions, and pipeline challenges — are being addressed by separate legislative task forces like the **Public Education Compensation Committee (PECC)**. The PSB's continued involvement in regulatory review only adds delay, inconsistency, and confusion for schools and stakeholders across the state.

More critically, the division of authority between PSB, DDOE, and SBE has made it difficult for the public — including parents, educators, and school leaders — to even know **how or when to engage in the policymaking process**. Some regulations are DDOE Secretary-only. Others require assent from the SBE. Still others involve joint action between DDOE, PSB, and SBE. The result is a regulatory maze that is nearly impossible to navigate without legal support or policy expertise — a burden that disproportionately impacts smaller school systems like public charter schools, creates a gross lack of transparency, and dissuades community engagement.

This overlapping work also contributes to excessive costs. In FY2023, the PSB's appropriations totaled **\$228,900**, with **\$21,000 in non-salary expenses** — though no detailed public budget or expenditure report is available to explain how those dollars were used.

Moreover, the PSB's regulatory delays have **slowed urgent work**. For example, the charter leader certification regulation (Regulation 1596) has taken more than three years, four versions, and two pieces of legislation (SB 163 and SB 311) to finalize — and was still changed at the last minute without consensus — leaving us in limbo to this day. This is not good governance.

If the PSB were dissolved or folded into DDOE/SBE oversight, educator certification in Delaware would be:

- **Simplified** for schools and the public;
- **Fiscally leaner** with fewer administrative overlaps;
- **More transparent**, with clear timelines and responsibilities;
- And **more accountable** to student outcomes rather than regulatory tradition.

Licensure & Certification Barriers

When we raise concerns about educator licensing rules, some people hear: “You want uncertified and unlicensed people teaching our students.”

This could not be further from the truth. The charter community will never ask for lower standards, we are advocating for standards that fit qualified individuals that have the experience to teach or lead. What we are saying is:

“We support rigorous pathways that honor different types of qualifications — especially from second-career educators, veterans, nonprofit leaders, and individuals who have proven they belong in the classroom or leading a school.”

We believe in standards, and we believe those standards should reflect the real needs of today's schools and the diverse backgrounds of the people who want to serve them.

Today's licensure system assumes a single, narrow pipeline for leaders:

- 4 years in a classroom
- A master's degree in educational leadership

But many of the most effective charter school leaders in Delaware — and across the country — come from **nontraditional backgrounds**:

- The military
- The business sector
- Higher education
- Community-based organizations

In excluding these leaders, the current system is not protecting students — it's **threatening innovation and diversity in leadership**.

Not only does the current system exclude qualified individuals, but it also fails to provide support to its teachers:

- The DEEDS online system routinely fails to notify educators when licenses are about to expire — leading to avoidable lapses. **Of note, we are aware that DDOE is updating this practice to ensure that this no longer happens.*
- HR directors cannot view license status until after an employee has already been hired and paid twice.
- In many charter schools, HR is a small team of one or two — these technical failures create legal liability and unintentional non-compliance.

We believe this is a fixable problem, however, it has yet to be resolved all while the burden falls on schools and educators.

We are asking to **evolve certification**. We are calling to expand certification and licensure options—not eliminate them — so that experienced, proven professionals can enter public education through a safe and rigorous pathway. We believe in vetting professionals. The charter community still wants them trained. But we ask for a system that opens options for qualified individuals and does not exacerbate the shortages in education.

Lack of Representation & Board Imbalance

The PSB's board composition is structurally exclusive and fails to reflect the diversity of Delaware's public education system. Currently, educators can only be nominated to the PSB through the Delaware State Education Association (DSEA), administrators through the Delaware Association of School Administrators (DASA), and school board members through the Delaware School Boards Association (DSBA). This effectively blocks representation from any charter school or educator who is not a member of one of these entities.

As a result, not a single charter school leader or teacher has ever served on the PSB — despite charters representing 24 public schools and more than 19,000 students statewide. In addition to being restricted by nomination pipelines, the board has developed an insular culture of reappointment. Members are simply asked if they want to stay on. If they do, no one else from that region or position has an opportunity to serve. One member has been on the board for over 18 years. Others have served a decade or more. This locks out new perspectives and limits the opportunity for Delaware's growing and diverse educator workforce to have a voice in regulation.

Four school districts hold multiple spots each on the 16-member board. Across the board and their two committees, 7 of the 19 school districts and 21 of the 24 charter schools have no representation. To be eligible, teachers are required to have been a teacher of the year at the school or district level, or Nationally Board-Certified. This does not take into consideration that not all people want to be recognized as the teacher of the year, nor do all schools, at least in the charter community, participate, and this presumes, wrongly, that these are the only teachers that are excellent in their roles. That is unfair to those that were never chosen as a teacher of the year but are still providing for excellent student

outcomes. We must recognize that there are other ways to show that an educator represents the best in their profession.

Furthermore, there is no system for self-nomination and no clear accountability for ensuring a balance of representation across district and charter schools, geographic regions, or racial and linguistic diversity. Parents, educators of color, and professionals from nontraditional backgrounds have virtually no path to serve on this regulatory body. This imbalance is not just procedural — it directly contributes to regulations that ignore the needs and experiences of large portions of Delaware’s public school system.

Legislative Overreach

The PSB has operated beyond the scope of its statutory authority. According to their own self-report, “The Standards Board does not issue any advisory or policy opinions. Current statute does not give the Standards Board the authority to do so outside of what is stated in 14 Del. C. § 1205(b).” Yet, as detailed in the section below, the PSB has taken public positions on pending legislation, like they did with SB 163, in direct contradiction to its stated limitations. This action was not only inappropriate, but it further demonstrates a lack of internal accountability or regard for procedural norms.

Persistent Bias Against Charter Schools

There is a clear and well-documented pattern of bias within the PSB against Delaware’s public charter school community. Over the past three years, our schools have submitted formal public comments in overwhelming numbers — often with more than 30 comments opposing proposed regulations — only to have their input dismissed with little or no substantive response. One of the most telling examples is regulation 1596 or the Charter Leader regulation, which moved forward despite an overwhelming number of comments opposed, the vast majority of which raised concerns or opposed the regulation outright. No meaningful changes were made, and no transparent rationale was offered for why that feedback was ignored.

Charter schools have been singled out through the scheduling of special meetings that have not been held for any other communities. A [special meeting was called on June 5, 2023](#), specifically to discuss a law created to address the need to preserve our charter boards’ autonomy to hire leaders that meet the needs of their students, staff, and school community. This meeting led to the PSB using its position to oppose charter-related legislation — including a formal [letter to the Senate Executive Committee](#) urging opposition to SB 163, a bill that was supported by the DDOE, charter educators, leaders, and families.

Perhaps most concerning, members of the PSB have made public and private comments that undermine the professionalism and legitimacy of charter school leaders. In a 2022 email to legislators, the PSB Chair, then-member of the PSB, wrote, “I wondered whether I should even bring up the fact that charters are under fire right now for having unlicensed and uncertified teachers and administrators in their buildings, but I feel it would be negligent to ignore that fact. The state is deciding what to do with these educators, who quite frankly, are not educators at all according to state code...” This language is not only inaccurate, but also disrespectful to the thousands of educators and school leaders working in our charter schools — many of whom have received recognition for their work.

This pattern of exclusion and disrespect has not only resulted in harmful regulation—it has also damaged the relationship between the PSB and our charter community. This disrespect has chipped away any of the trust we had, undermined collaboration, and further illustrates the total lack of regard for the voice of our community.

When legislators crafted the charter law in 1994, it was always with the intent to inform and improve public education overall.

“The purpose of this chapter is to create an alternative to traditional public schools operated by school districts and improve public education overall by establishing a system of independent “charter” schools throughout the State.”

How can we fulfill that purpose, if our voice is treated as unwanted, wrong, or less than. We may be different, but that does not mean that we are substandard. Yet, this is what we are told publicly and privately. This is what is recorded in minutes, and in letters and emails to legislators. For three years, we have been told that we are not good enough. That the way we do things is wrong. And that we are not keeping children safe – all because we are different.

We believe that differences must be celebrated; that diverse backgrounds and experiences enrich educational opportunities for students. Flexibility and innovation should be embraced, not shunned.

In both the Self Report and Staff Report, it is suggested that our community have at least one seat on the PSB. To be clear, we are extremely concerned with how a member of our charter community would be treated by the PSB based on the bias we have experienced over the last three years.

Proposed Solutions

After years of documented inefficiencies, regulatory overreach, and exclusion of voices — particularly from public charter schools — we believe the most effective path forward is to either **dissolve the Professional Standards Board (PSB) or make them an advisory committee to the DDOE / SBE**. This is not a call to eliminate standards or accountability. It is a call to ensure that educator policy in Delaware is driven by results, reflective of the diversity of its students and schools, and aligned with the evolving needs of our public education system.

We offer the **following recommended actions**:

1. Sunset the PSB and Create an Advisory Committee of Education Stakeholders to DDOE and/or SBE
 - 1.1. Consolidate regulation approval and implementation under the Delaware Department of Education (DDOE) and/or State Board of Education (SBE).
 - 1.2. Eliminate overlapping review steps that delay urgently needed updates to educator licensure and certification rules.
 - 1.3. This model is already in place for numerous other regulatory functions across state agencies and would lead to greater efficiency, transparency, and cost savings.
2. Include more voices within the Advisory Committee
 - 2.1. Establish representation from district schools, charter schools, nontraditional educator pathways, higher education, parents and school board members
 - 2.2. Allow self-nomination and stick to term limits to prevent insular appointment structures and bring new voices and diverse experiences to the work.
 - 2.3. Use these voices to come up with certification updates ensuring an inclusive process.
3. Expand Certification Pathways While Maintaining Accountability
 - 3.1. Develop alternative licensure routes for second-career professionals, military veterans, and school leaders with demonstrated experience and success.
 - 3.2. Incorporate portfolio-based assessments, mentorship models, and on-the-job evaluations into certification alternatives.
 - 3.3. Ensure continued requirements for background checks, child safety clearances, and performance monitoring – because safety and results matter more to us than a rigid and inflexible system that doesn't reflect the incredible diversity of our student body.

This approach aligns with national trends and recommendations from organizations such as the National Association of Charter School Authorizers (NACSA) and the Council for Chief State School Officers (CCSSO), which recognize the need for more **inclusive and flexible pathways** into the profession to deal with teacher shortages.

The current system does not serve educators, families, or the public efficiently. Specifically for our community, it undermines charter autonomy, misaligns with legislative intent, and it also forces the state to spend time and money maintaining an unnecessary structure. These proposed changes would **streamline governance, enhance collaboration, and center student outcomes** — not bureaucracy.

The PSB's actions surrounding Regulation 1596 (Charter Leader Certification) are one of the main reasons why change is urgent. Despite receiving 34 public comments, 94% of which were in opposition, the Board moved forward anyway. No changes and reasoning for their decision, that continued to disregard our community's input.

We ask for a certification that allows for an alternative certification pathway for thoroughly vetted qualified professionals and for the state to honor the legislative intent of Delaware's charter law by recognizing that charter schools were designed to operate differently—with flexibility, innovation, and accountability at their core.

Conclusion & Sunset Request

The Professional Standards Board no longer meets the needs of Delaware's educators, schools, or students. It has become a duplicative, exclusionary, and inefficient body that undermines transparency, slows necessary reform, and actively marginalizes public charter schools.

We respectfully request that the Joint Legislative Oversight Sunset Committee recommend the **dissolution of the PSB**, and that its functions be transferred to the **Delaware Department of Education and/or State Board of Education**. An advisory committee should be formed and include the voices of distinct stakeholders— including charter school leaders, second-career educators, and parents — to ensure that regulation is informed, balanced, and student-centered.

Our schools cannot afford to lose years of progress to bureaucratic delays and governing bodies that do not represent the full landscape of Delaware public education. This is not a call for less accountability — it is a call for **better governance**. One that reflects who our students and educators are, how we serve, and the future that they all deserve.

From: Rachel Valentin <Rachel.Valentin@csnc.k12.de.us>
Sent: Thursday, May 1, 2025 12:45 PM
To: Sunset (Mailbox Resources)
Subject: Public Comment: Licensure & Certification

Public Comment:

Dear Chair Hoffner, Vice Chair Romer, and members of the Joint Legislative Oversight Sunset Committee

Delaware is facing a critical teacher shortage that threatens the quality and consistency of education for students across the state. Solving this crisis demands immediate action and a willingness to think beyond traditional models. Now more than ever, we must listen to all voices in education—including the charter school community, which brings valuable experience, innovation, and flexibility to the table.

Charter schools have long adapted to staffing challenges with creative approaches, and their insights can help inform broader solutions for public education. As we work to ensure every student in Delaware has access to a qualified, caring teacher, we must embrace diverse strategies and partnerships. This is not the time for division—it's the time for collaboration, urgency, and bold thinking.

Thank you,

Rachel Valentin

Charter School of New Castle



May 1, 2025

Joint Legislative Oversight and Sunset Committee (JLOSC)-

The Delaware State Education Association (DSEA), representing more than 14,000 members of Delaware's education workforce, submits this letter of support for the Professional Standards Board (PSB). DSEA believes that the process for educator licensure and certification should be built upon a set of rigorous professional standards. The Association believes that educator licensure and certification should signify that an individual in the education profession is competent to serve in their respective role. Educator licensure must be recognized as the primary requirement for employment in every PreK, elementary, secondary, and adult education public and private school. The work of the Delaware Professional Standards Board is critical to ensure we have appropriate standards and requirements that align with the needs of educators and students in our state, while not being overly cumbersome. The PSB serves a critical role as a board comprised of practitioners that represent the diverse community of the education workforce who fully understand the impact their decisions have on Delaware's K-12 education system. DSEA appreciates that the board affords stakeholder groups ample opportunity to offer their perspectives on proposed regulatory changes for consideration, even when faced with irrational logic and/or behavior.

It is for the reasons outlined above that the Delaware State Education Association supports the continued existence of the Professional Standards Board.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jon Neubauer', is placed above the printed name.

Jon Neubauer
Director of Education Policy
Delaware State Education Association

DELAWARE STATE EDUCATION ASSOCIATION

Headquarters | 136 East Water Street | Dover, Delaware 19901 | P 302.734.5834 | F 674.8499 | TF 866.734.5834
Branch Office | 4135 Ogletown-Stanton Road | Suite 101 | Newark, Delaware 19713 | P 302.366.8440 | F 302.366.0287

www.dsea.org

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