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INDEPENDENT REGULATORY REVIEW COMMISSION
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June 11, 2003

Patricia White, Executive Director
State Board of Education
333 Market Street, 1st Floor
Harrisburg, PA 17126

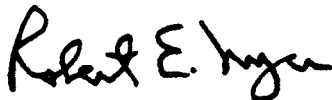
Re: Regulation #6-283 (IRRC #2336)
State Board of Education
Academic Standards and Assessment for Career Education and Work

Dear Ms. White:

Enclosed are the Commission's Comments for consideration when you prepare the final version of this regulation. These Comments are not a formal approval or disapproval of the regulation. However, they specify the regulatory review criteria that have not been met.

The Comments will be available on our website at www.irrc.state.pa.us. If you would like to discuss them, please contact my office at 783-5417.

Sincerely,



Robert E. Nyce
Executive Director

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Enclosure

cc: Honorable Jess M. Stairs, Majority Chairman, House Education Committee
Honorable James R. Roebuck, Jr., Democratic Chairman, House Education Committee
Honorable James J. Rhoades, Chairman, Senate Education Committee
Honorable Allyson Y. Schwartz, Minority Chairperson, Senate Education Committee
Honorable Vicki L. Phillips, Secretary, Department of Education

Comments of the Independent Regulatory Review Commission

on

State Board of Education Regulation No. 6-283

Academic Standards and Assessment for Career Education and Work

June 11, 2003

We submit for your consideration the following comments that include references to the criteria in the Regulatory Review Act (71 P.S. § 745.5b) which have not been met. The State Board of Education (Board) must respond to these comments when it submits the final-form regulation. The public comment period for this regulation closed on May 12, 2003. If the final-form regulation is not delivered within two years of the close of the public comment period, the regulation will be deemed withdrawn.

1. Standard 13.1. Career Awareness and Planning – Clarity.

Standard 13.1.5.F. requires students to “identify the components of a career plan.” The Board could improve clarity by listing the components of the plan in the standard or defining the term (including the components) in the Glossary.

2. Standard 13.3. Career Retention (Keeping a Job) – Clarity.

Standard 13.3.3.F. requires students to “identify changes impacting the workplace.” Clarity would be improved by including examples of changes in the standard.

3. Standard 13.4. Entrepreneurship – Clarity.

Standard 13.4.8.D. refers to the “components of an intervention plan.” Although “intervention plan” is defined in the Glossary, the components are not included in the definition. For clarity, the components should be listed in either the definition or Standard 13.4.8.D.

Standard 13.4.11.B. requires students to “apply business principles to the development of an entrepreneurial business plan.” What is a student obligated to do to meet this standard? The final-form regulation should clarify what is required by this standard. The Board should also consider defining “business principles” and “entrepreneurial business plan” in the Glossary.

4. XXXIX. Glossary – Clarity.

We have identified the following terminology used in the Glossary which does not match the terminology used in the text of the standards:

- The term “decision making” is defined in the Glossary, but the term used in Standard 13.1.11.F. is “decision-making skills.”

- The term “employment trends” is defined in the Glossary, but the terms used in Standards 13.1.5.D., 13.1.8.C. and 13.1.8.D. are “employment opportunity” and “employment opportunities.”
- The term “manipulate” is defined in the Glossary, but the term used in Standards 13.2.3.G., 13.2.8.G. and 13.2.11.G. is “manipulative.”
- The term “mediating” is defined in the Glossary, but the term used in Standard 13.3.8.B. is “mediation.”
- The term “negotiating” is defined in the Glossary, but the term used in Standard 13.3.8.B. is “negotiation.”

The terms defined in the Glossary should match the terms used in the text of the standards.

Also, the term “networking” is defined in the Glossary, but does not appear to be used in the text of the standards. If this term is not included in the text of the standards, it should be deleted from the Glossary.