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INDEPENDENT REGULATORY REVIEW COMMISSION
333 MARKET STREET, 14TH FLOOR, HARRISBURG, PA 17101

January 4, 2006

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

Re: Regulation #6-296 (IRRC #2500)
State Board of Education
Academic Standards and Assessment for Career Education and Work

Dear Mr. Buckheit:

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 me.

Sincerely,

Kim Kaufman
Executive Director

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Enclosure

cc: Honorable James J. Rhoades, Chairman, Senate Education Committee
Honorable Raphael J. Musto, Minority Chairman, Senate Education Committee
Honorable Jess M. Stairs, Majority Chairman, House Education Committee
Honorable James R. Roebuck, Jr., Democratic Chairman, House Education Committee
Honorable Gerald L. Zahorchak, Acting Secretary, Department of Education

Comments of the Independent Regulatory Review Commission

on

State Board of Education Regulation #6-296 (IRRC #2500)

Academic Standards and Assessment for Career Education and Work

January 4, 2006

We submit for your consideration the following comments on the proposed rulemaking published in the November 5, 2005 *Pennsylvania Bulletin*. Our comments are based on criteria in Section 5.2 of the Regulatory Review Act (71 P.S. § 745.5b). Section 5.1(a) of the Regulatory Review Act (71 P.S. § 745.5a(a)) directs the State Board of Education (Board) to respond to all comments received from us or any other source.

1. General. – Reasonableness; Clarity.

The Education Law Center (ELC) suggested several additions to these standards in its comment letter. While we do not agree with all of ELC's suggestions, we concur with ELC that the Board should consider adding language that will help ensure that students with disabilities will be given the opportunity to be adequately prepared for the workforce.

For example, the Board should consider adding a reference to the Americans with Disabilities Act (ADA) in Standards 13.2.8.E and 13.2.11.E and add a definition of ADA to the Glossary. Also, the Board should consider adding a reference to "Vocational Rehabilitation Centers" in Standard 13.1.11.E, as suggested by ELC.

2. Standard 13.3. Career Retention and Advancement. – Clarity.

Standard 13.3.3.F. requires students to "identify changes that occur at both home and school." To clarify this requirement, the Board should identify what sort of "changes" it expects the students to identify and the relevance of these "changes" to Career Retention and Advancement. A similar concern applies to Standard 13.3.5.F.

3. 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 "Child Labor Laws" is defined in the Glossary, but the term used in Standards 13.2.8.E. and 13.2.11.E. is "Child Labor Law."
- The term "Non-traditional careers" is defined in the Glossary, but the term used in Standards 13.1.5.B and 13.1.8.B is "nontraditional."

- The term “O*NET” is defined in the Glossary, but the term used in Standards 13.2.8.B and 13.2.11.B is “O-NET.”

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

IRRC #2500 #6-296
State Board of Education
Academic Standards and Assessment for Career
Education and Work

Jmaes Buckheit, Exectuive Director

Jmaes Buckheit

Date: 1/4/06