



PENNSYLVANIA

Association of Career & Technical
Administrators

RECEIVED

2008 MAR 28 AM 9: 44

INDEPENDENT REGULATORY
REVIEW COMMISSION

March 26, 2008

#2520

Mr. Kim Kaufman
Executive Director
IRRC
14th Floor
333 Market Street
Harrisburg, PA 17101

Dear Mr. Kaufman:

The purpose of this letter is to comment on the Vocational Education Standards, Chapter 339 as submitted to the Independent Regulatory Review Commission on March 6, 2008. I am providing comments on behalf of the members of the Pennsylvania Association of Career and Technical Administrators (PACTA). PACTA represents the administrative staffs of career and technical schools as well as the career and technical administrators of high schools with large career and technical programs.

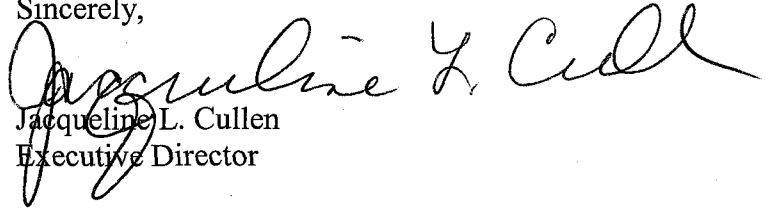
PACTA strongly supports the proposed 339 Standards. We believe that the Standards will improve the quality of career and technical education programs across the Commonwealth. The provisions related to Program Approval (Section 339.4), Program Content (Section 339.22) and Occupational Advisory Committees (Section 339.14) will directly impact the relevance and rigor of the programs offered.

PACTA strongly supports the maintenance in Section 339.22 of the Standards that programs meet minimum time requirements in order to qualify for vocational subsidy. This requirement ensures that students across the state have the instructional time necessary to achieve their educational and occupational objectives and to meet industry standards. We believe that the minimum time requirement is an essential element in the achievement of the Accountability Standards (Section 339.4) as defined in the Chapter.

PACTA also strongly supports the addition of Section 339.56, Technical Institutes to these Standards. This section will allow adults across the state better access to the education and training they need to compete in today's workforce and will allow business better access to the qualified workers it needs to compete in a world economy.

Once again, PACTA strongly supports the adoption of the Vocational Education Standards, Chapter 339 as submitted to IRRC on March 6, 2008. Thank you for this opportunity to comment on the proposed Standards.

Sincerely,

A handwritten signature in black ink, appearing to read "Jacqueline L. Cullen". The signature is fluid and cursive, with a large initial "J" and "C".

Jacqueline L. Cullen
Executive Director