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COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF EDUCATION  
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INDEPENDENT REGULATORY  
REVIEW COMMISSION

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SECRETARY OF EDUCATION

March 15, 2006

The Honorable Noah W. Wenger  
Senate of Pennsylvania  
Senate Box 203036  
Harrisburg, PA 17120

Dear Senator Wenger:

Thank you very much for expressing your concerns regarding the standards under review in Chapter 339. It is imperative that the Department of Education (PDE) receive feedback when considering the implementation of regulations and standards. We appreciate your commitment to Career and Technical Education (CTE) and look forward to continued efforts in serving the students of Pennsylvania.

I appreciate your concern over the 360 hour requirement the Department is now utilizing as a component of program approval. The continuing approved program review visits are based on the existing standards in Chapter 339 and are current State Board of Education and Department regulations. In addition to the 360 hour requirement, approved programs must have: (a) planned instruction, (b) series of courses based on occupational analysis, (c) employment related performance objectives, (d) administration of occupational assessment, (e) student prepared educational and occupational objectives based on occupational performance, (f) advisory committees, (g) safety education, and (h) admissions policies. Also, please be aware that the use of the Supervised Agriculture Experience does meet the time requirement for each approved program.

Vocational subsidy is based on approved program status and payment is based on Average Daily Membership of CTE students. CTE students are those seeking occupational goals related to the approved program as defined by Classification of Instructional Program and occupational analysis. The School Code does not include instructional hours as a part of the subsidy formula. PDE is considering all options in relation to this matter to ensure available resources are best utilized.

The Bureau of Career and Technical Education (BCTE) has been thoroughly reviewing how to best serve pupils, and how this can best benefit the needs of business and industry. A study completed for the state of Pennsylvania by Jobs For The Future, has given us guidelines for proceeding. This study has found that along with academic rigor, Pennsylvania should align CTE with industry relevant training and standards. Sufficient time must be spent in the CTE classroom to ensure we are meeting these standards.

It is not our intention to eliminate any CTE program, rather to provide resources for strengthening curriculum content and improving student occupational and academic achievement.

Quality career and technical education programs require a continuing commitment and the dedication of schools, legislators, business and industry and The Department of Education. BCTE stands ready to provide the needed resources and support. Together, we can provide quality education for all students in Pennsylvania.

Sincerely,

A handwritten signature in black ink, appearing to read "Gerald L. Zahorchak". The signature is fluid and cursive, written in a professional style.

Gerald L. Zahorchak, D.Ed.

cc: Diane Castelbouno, Deputy Secretary, Office of Elementary and Secondary Education  
Dr. Lee Burket, Director, Bureau of Career and Technical Education  
Mr. John R. McGinley, Jr., Esq., Chairman, IRRC ✓  
The Honorable James Rhoades, Chairman, Senate Committee on Education  
The Honorable Jess Stairs, Chairman, House Committee on Education



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Senate of Pennsylvania

NOAH W. WENGER  
36TH DISTRICT

February 27, 2006

Dr. Gerald L. Zahorchak, Secretary  
Pennsylvania Department of Education  
333 Market Street  
10<sup>th</sup> Floor, Harrisstown 2  
Harrisburg, PA 17126

Dear Dr. Zahorchak:

I am writing to express my concerns regarding the regulation changes proposed for Title 22 (Education), Chapter 339 (Vocational Education). Specifically, I believe that certain changes could have an adverse impact on vocational agriculture programs in our Commonwealth.

Under the section regarding minimum time requirements for vocational education programs, the Department of Education proposes changes that would tie a school's reimbursement subsidy to a minimum time requirement of 360 hours per year for all occupational vocational education programs. While I understand that the 360 hour requirement is part of the existing Chapter 339 standards, it has not previously been used as a condition for reimbursement, nor did it apply to students in the ninth grade.

Vocational agriculture programs are unique to most vocational programs; about 2/3 are offered within high schools, rather than at career and technology or other vocational centers. However, today's high school student schedules are already quite demanding as they prepare for post-secondary education and schools work to meet requirements of the federal No Child Left Behind Act. It will be very difficult, if not impossible, for students taking agriculture education courses in a traditional high school setting to make room for two hours each day. Students enrolled in programs at career and technology centers have a better chance of meeting the requirements, but even there, not all can.

In addition, I notice that the use of supervised occupational experiences and cooperative and clinical experiences for vocational education credits, permitted under the current regulations, would be removed under the proposed changes. Agriculture, because of its diversity, cannot be limited to classroom time alone and is necessarily enhanced by these other experiences. Removing the use of the Supervised Agriculture Experience record book, a nationally recognized system, further increases the likelihood that students will be unable to meet the 360-hour requirement.

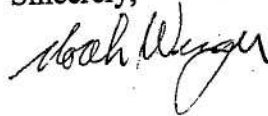
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Under the changes proposed by the Department of Education, high schools that cannot meet the 360-hour requirement would not receive their reimbursements and therefore might not be able to continue providing these valuable courses to their students. This would eliminate many vital experiences and exposure to agriculture that are often the precursor to college educations for many students pursuing careers in farming as well as many other important agriculture-related fields where post-secondary education is required.

Agriculture is the number one industry and a vital part of the economic engine of our Commonwealth. If we lose these opportunities to introduce young students to agriculture and prepare them for careers in the agriculture industry, we stand to lose the successful future of this industry. I ask that you consider the negative effect the changes to the vocational education regulation could have as the regulation review process moves forward.

I appreciate this opportunity to comment on this matter. If I can provide further information or assistance, please do not hesitate to contact me.

Sincerely,



Noah W. Wenger, Chairman  
Senate Appropriations Committee

NWW/lml

Cc: Robert G. Barlett, Director, Bureau of Career and Technical Education  
John R. McGinley, Jr., Esq., Chairman, IRRC  
The Honorable James Rhoades, Chairman, Senate Committee on Education  
The Honorable Jess Stairs, Chairman, House Committee on Education