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**GERALD J. LAVALLE**  
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*Democratic Caucus Secretary*



**Senate of Pennsylvania**

April 11, 2006

ORIGINAL: 2520

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GOVERNOR'S TOURISM AND TRAVEL COUNCIL

Secretary Gerald L. Zahorchak, Ph.D.  
Pennsylvania Department of Education  
333 Market Street  
Harrisburg, PA 17126

Dear Dr. Zahorchak:

I am writing to express my great concern regarding the recently proposed enforcement of the 360-hour vocational education requirement for reimbursement set forth in 22 Pa. Code, Chap. 339, as applied to agricultural education in the Commonwealth's high schools. It is my understanding our high schools provide agriculture education programs to nearly as many students as career and technical education centers. Additionally, most high school agricultural programs exist in conjunction with FFA programs not provided by career technology centers.

I fear strict enforcement of the minimum hour requirement in the comprehensive high school setting will ultimately have far-reaching negative consequences to agriculture, the state's largest employer contributing \$44 billion per year to our economy. Many, if not all, agricultural education programs could be eliminated from our high schools, thereby preventing a great number of students from continuing their pursuit of agriculture-related careers where post-secondary education is required. Imposition of this requirement would be virtually impossible for college prep students in light of classroom hours and academic course criteria. The affect of this requirement would be contrary to the well-established goals of our Governor and General Assembly to attract young people to agriculture-related careers.

In light of these concerns, I strongly urge you to consider the implications of the revised minimum-hour requirement as applied to agricultural education programs in our high schools. Maintaining the opportunity to participate in these programs will help ensure the future of our state's economy.

Sincerely,

Handwritten signature of Gerald J. LaValle in cursive.

GERALD J. LAVALLE  
STATE SENATOR

GJL:spg

cc: Honorable James J. Rhoades  
Honorable Raphael J. Musto  
Mr. Howard Leslie



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF EDUCATION  
333 MARKET STREET  
HARRISBURG, PENNSYLVANIA 17126-0333

SECRETARY OF EDUCATION

May 8, 2006

INDEPENDENT REGULATORY  
REVIEW COMMISSION

2006 MAY -9 PM 1:52

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717-787-5820 (TEL)  
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**ORIGINAL: 2520**

The Honorable Gerald J. LaValle  
Senate of Pennsylvania  
Senate Box 203047  
Harrisburg, PA 17120-3047

Dear Senator LaValle:

Thank you for your questions and comments concerning current and proposed Chapter 339 vocational standards. 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) including Agriculture Education and look forward to continued efforts in serving the students of Pennsylvania.

Your letter references the Department's enforcement of a 360 hour requirement for educational programs that hold approved career and technical education program approval. Please note that the Department has not reintroduced or is imposing a new requirement in relation to instructional time. The Department has established an instructional time requirement and continues to support an instructional time requirement since Chapter 339 was established. When the Department had regional offices established across the Commonwealth, Department staff would routinely visit schools to ensure all regulations were met. Upon closure of the regional offices, the Department has relied on the integrity of school district superintendents and career and technical school directors when they sought program approval. The chief school administrators sign assurances when seeking program approval. The signed assurances continue to be a means of school districts and career and technical schools notifying the Department that they will adhere to all regulations. The Department continues to firmly believe in the integrity of the signatory that all regulations, including the instructional time requirement, will be met.

The Bureau of Career and Technical Education (BCTE) has been reviewing programs during the 2005-2006 school year. The continuing approved program review visits are based on the existing standards in Chapter 339 and current State Board of Education 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.

To this point, reviewers have found that over 60 percent of the school districts meet the 360 hour requirement, however, none of the high schools have the necessary local and occupational advisory committees. As you can see, the hour requirement is an attainable goal for school districts when seeking program approval, and is not the only standard being reviewed for compliance.

The letter notes that there are as many vocational agriculture education programs being taught in a comprehensive high school setting as there are in career and technical education centers, and there are 41,000 students in these programs. The letter notes that in order for students to enroll in college preparatory courses, students cannot participate in 360 hours of technical training. The Department data indicates the assumptions presented in the letter are incorrect. Department data evidences that there are 182 Agriculture Education programs statewide, 53 of these programs are offered at career and technical education centers (CTCs) and 129 programs at high schools. There are 2,168 students enrolled in CTCs and 5,717 students enrolled at high schools. The percentage of 11<sup>th</sup> grade CTE students reaching the state defined level of proficiency on the statewide academic assessments is as follows. For students enrolled in high school Agriculture programs 18% of the students are proficient in Math and 34% of the students are proficient in Reading. For students enrolled in CTC Agriculture programs, 22% of the students are proficient in Math, and 45% of the students are proficient in Reading. The percent of learning disabled students in high school Agriculture programs is 16% and in CTCs is 34%. As noted earlier, based on the program reviews conducted during the 2005-2006 school year, 60% of the high schools are meeting the 360 hour requirement while providing academic coursework.

The Department remains committed to ensuring all student receive quality education and remains deeply concerned that students enrolled in Agriculture education offered at the comprehensive high school are performing at a level that is below the level of students enrolled in Agriculture education programs offered at CTCs. The Department is also concerned that students enrolled in all Agriculture education programs are performing below students enrolled in programs in Business Education, Trade and Industry and Health Occupations.

Quality career and technical education programs require a continuing commitment and the dedication of schools, legislators, business and industry and the Department of Education. The Bureau of Career and Technical Education stands ready to provide the needed resources and support to all school districts and career and technical centers as they operate approved career and technical education programs. Together, we can provide quality education for all students in Pennsylvania.

Sincerely,



Gerald L. Zahorchak, D.Ed.

cc: Diane Castelbuono, Deputy Secretary, Office of Elementary and Secondary Education  
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  
Office of Government Relations