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DEPARTMENT OF EDUCATION
333 MARKET STREET
HARRISBURG, PA 17126-0333
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INDEPENDENT REGULATORY
REVIEW COMMISSION

February 22, 2006

Independent Regulatory Review Commission
14th Floor, Harristown 2
333 Market Street
Harrisburg, PA 17101

To Whom It May Concern:

Attached, please find a copy of a letter from Dr. Lee Burket regarding a statement letter from Robert B. Lauffer on proposed 22 PA. Code, Chapter 339 Vocational Education.

If you have any questions or concerns, you may contact Dr. Burket at 717-787-5530 or lburket@state.pa.us.

Sincerely,

Adam Schott
Director
Office of Government Relations



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DEPARTMENT OF EDUCATION
333 MARKET STREET
HARRISBURG, PA 17126-0333
www.pde.state.pa.us

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INDEPENDENT REGULATORY
REVIEW COMMISSION

February 22, 2006

Robert B. Lauffer
Agricultural Science Instructor
Garden Spot High School
669 E. Main Street
New Holland, PA 17557

Dear Mr. Lauffer:

Thank you for your statement letter of February 15, 2006 on proposed 22 Pa. Code, Chapter 339 Vocational Education.

Your letter is considered as official public comment. Pursuant to the provisions of the Regulatory Review Act, copies of your comments will be provided to the Independent Regulatory Review Commission (IRRC) and the Chairpersons of the House and Senate Education Committees.

The Regulatory Review Act provides that information on proposed and final regulations be mailed to public commentators at their request. If you would like to receive the final-form of these regulations when they are finalized, please make your request to me in writing at the address printed above.

Sincerely,

Lee Burket, Ed.D.
Acting Director
Bureau of Career and Technical Education

cc: Senator Rhoades
Senator Musto
Representative Stairs
Representative Roebuck
IRRC ✓

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Agricultural Science Instructor
Garden Spot High School
669 E. Main Street
New Holland , PA 17557

February 15, 2006

Robert G. Barlett, Director
Bureau of Career and Technical Education
333 Market Street
Harrisburg, PA 17126-0333

Dear Mr. Barlett,

Subject: Public Comment: Chapter 339 and Agriculture Education

As a teacher in an agriscience program that has a history of a strong three-pronged approach to agricultural education: classroom instruction, FFA, and Supervised Agricultural Experience, I am very concerned about the hour requirements put forth in Chapter 339. As I am sure you are well aware, many of the outstanding agricultural education programs and FFA chapters throughout the state are currently delivered through comprehensive high schools. I have a very serious concern that the 360 hour stipulation for reimbursement will have a very negative impact on many quality programs.

I am in my 29th year of teaching agricultural education in a comprehensive high school setting. In the past I know that not all of the 360 hours were required to be "seat time". Students could be credited with time spent on Supervised Agricultural Experience or (SAE) programs as well as related course work that led to their career path. It is my understanding that under current leadership the 360 hours are being interpreted more literally. I have a great respect for Career and Technical Centers, in fact I have some very dear friends and colleagues that do tremendous work in agricultural education in that setting. However, I am very concerned that the business of agricultural education is far too important to our state as a whole to be limited to CTC's only.

A number of my students go on to the local CTC's in such agriculturally related fields as horticulture and diesel mechanics. A much greater percentage of my students, more than our student body at large, go on to post-secondary training, many at four-year colleges. It has been my experience that these students have been well prepared to handle the rigors of college course work and additionally their background in agricultural education prepares them for course work in a wide variety of agricultural studies. It has also been my observation that there is a direct link between those who have conducted an outstanding SAE program and success in college and beyond.

The SAE program, with its emphasis on record keeping, skill development and hands-on learning is such a natural link to career preparation that it seems illogical not to include it as part of the hour requirements. At a time when PSSA testing, and other outside forces, is placing more and more demands upon the local school system and when the need for flexibility to allow access to such important programs is an all time high, why are we being more and more restrictive? It seems to me that any prudent individual would look to the future challenges of our food and fiber system here in Pennsylvania, nationally and even globally and ask the question "How can we increase access to agricultural education programs for a greater number of our best and brightest students?" Unfortunately that is not the response I am seeing from educational leadership. I am seeing more and more demands being placed upon local institutions making the effort to deliver these valuable programs to our students.

I read with interest the Regulatory Analysis Form being provided to the Independent Regulatory Review Commission. On page 4, I see that there are "no adverse effects anticipated" with the enforced compliance of Chapter 339 by all 81 CTC's and 301 high schools with approved CTC programs. At a time when we should be broadening the scope of our career training programs and making them accessible to an even greater number of students of all academic aptitudes, we seem to me to be taking several steps backwards. To me, this is an unbelievable trend and one that I truly hope is reversible before we have to lament our lack of vision for years to come.

I grant you that there are probably a number of schools within our commonwealth where the local board of education will place a high enough value on the agricultural education program to continue to support it in spite of the lack of state funds if they are unable to maintain the 360 hours. I guarantee this will not be the case everywhere and if Chapter 339 is enforced literally, some agricultural education programs will cease to exist. It is my hope that innovative thinkers and problem solvers will look at this situation and find a way to work it out rather than doggedly sticking to a guideline that clearly is unrealistic for the average comprehensive high school.

The fate of many students rests in these decisions. One agricultural education program forced into extinction or one student unable to benefit from agricultural education at the high school level is one too many. Thank you for your time and consideration.

Sincerely,



Robert B. Lauffer
Agricultural Science Instructor
Garden Spot High School