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INDEPENDENT REGULATORY  
REVIEW COMMISSION  
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Dr. Lee Burket  
Acting Director  
Bureau of Career and Technical Education  
Pennsylvania Department of Education  
333 Market Street  
Harrisburg, PA 17126-0333

Dear Dr. Burket:

The purpose of this letter is to comment on the Vocational Education Standards, Chapter 339 as published in the Pennsylvania Bulletin on February 4, 2006. I am providing comments on behalf of the members of the Pennsylvania Association of Vocational Administrators (PAVA). PAVA 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.

PAVA 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.

PAVA strongly supports the maintenance of the requirement in the Standards that a program be a minimum of 360 hours per year in order to qualify for 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 (d)(3)(i) as defined in the Chapter.

PAVA 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, PAVA strongly supports the adoption of the Vocational Education Standards, Chapter 339 as published in the Pennsylvania Bulletin on February 4, 2006. Thank you for this opportunity to comment on the proposed Standards.

Sincerely,



Jacqueline L. Cullen  
Executive Director

Cc: Independent Regulatory Review Commission