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

March 3, 2006

Jacqueline L. Cullen
Executive Director
23 Meadow Drive
Camp Hill, PA 17011-8331

Dear Ms. Cullen:

Thank you for your statement letter of March 1, 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 send your request to me at the address printed above.

Sincerely yours,

A handwritten signature in cursive script that reads "Lee Burket".

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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PAVA

Pennsylvania Association of
Vocational Administrators

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March 1, 2006

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John Pulver
President, Central Region
Lycoming County
Career & Technology Center

Gary Fedorcha
President, Eastern Region
Lehigh Career & Technical Institute

Marsha Welsh
President, Western Region
Northern Westmoreland
Career & Technology Center

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

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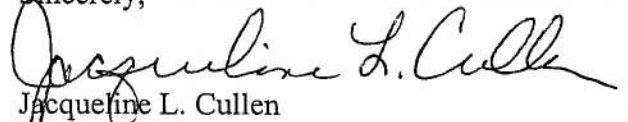
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across the state better access to the education and training they need to compete in today's workforce and will allow business better access to the qualified workers it needs to compete in a world economy.

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