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

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INDEPENDENT REGULATORY
REVIEW COMMISSION

March 6, 2006

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

To Whom It May Concern:

Attached, please find a copy of a letter from the Bureau of Career and Technical Education regarding a statement letter from Thomas Wakefield on proposed 22 PA. Code, Chapter 339 Vocational Education.

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

Sincerely yours,

A handwritten signature in blue ink that reads "Lee Burket".

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



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March 6, 2006

Thomas Wakefield
Chair
Bedford County Technical Center
Ag/Biotech Advisory Committee
Bedford County Technical Center
195 Pennknoll Road
Everett, PA 15537

Dear Mr. Wakefield:

Thank you for your statement letter of March 2, 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,

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

cc: Senator Rhoades
Senator Musto
Representative Stairs
Representative Roebuck
IRRC

Bedford County Technical Center

195 Pennknoll Road
Everett, Pennsylvania 15537

MAR 06 2006

Phone: (814) 623-2760

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Fax: (814) 623-7234

March 2, 2006

INDEPENDENT REGULATORY
REVIEW COMMISSION

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 Bedford County Technical Center Ag/Biotech Advisory Committee supports the efforts of the Department of Education to improve Career and Technical Education in Pennsylvania. The following is intended to serve as our contribution to the public comment regarding the reauthorization of the Chapter 339 Regulations pertaining to Career and Technical Education.

The changes in enforcement philosophy of Chapter 339 may potentially result in the loss of nearly \$400,000 in state revenue for the Bedford County Technical Center. If this loss of funding does result, and is abrupt, the continuation of many successful programs for students may be jeopardized and the initiation of innovative new programs such as the proposed ag/biotech curriculum may be impossible.

The Bedford County Technical Center reacted to the 2004 publication of the National Assessment of Vocational Education by adopting the philosophy that career and technical education is an important element in achieving proficiency in the academic standards. The technical programs are an example of the application of technology in the classroom to reach academic skills. We also believe that postsecondary education is essential for most careers, so a partnership with Allegany College of Maryland has provided our students access to early college (dual enrollment) for the last five years. The size of the school and the rural, small business, nature of Bedford County make very industry specific programs expensive and elusive in usefulness to local industry. Strong academic students with individualized career skills are marketable and desirable.

The fact that Chapter 339 requires approved programs to offer 360 hours and three planned courses per year is clearly understood. The program approvals received by the Bedford County Technical Center in 1999 and maintained locally since meet that requirement with a combination of technical courses and directly applied academics, primarily focused advanced sciences. The use of single period courses to create the hour requirement allows flexibility in developing individualization for students and the availability of drop-in electives for university bound students.

Under the current interpretation of the regulations, the Bedford County Technical Center has met the published state standards for career and technical education in the following areas: Advanced Academic Skills, 87 % (State Standard: 50%); Occupational Skills, 40% (State Standard: 35%); Completion Rate, 73% (State Standard: 50%); and Placement Rate, 96% (State Standard: 90%).

The Ag/Biotech Advisory Committee believes that the focus on hours of instruction, instead of the acquisition of proficiency on standards, or acquisition of individualized career skill sets, limits the ability of small rural schools to provide the same variety of career and technical education to our students. We also believe that funding should be based on performance and not only on the amount of time spent in the classroom. As a result of those beliefs, we would offer the following recommendations.

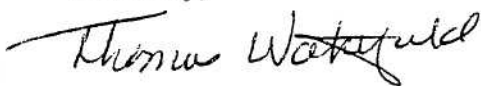
The transition of the system and the impact of funding effects would be more manageable if the Department would allow students currently enrolled in programs to finish programs under the present understanding of the regulations and any changes in CATS reporting would begin with first year students and be phased in over three years. We would recommend that the current definition of a completer be retained and not be defined as completing 1080 hours. The current definition of a student who enrolls in a program in eleventh grade, graduates and meets the standards requirements of the program allows for normal intra-program student movement without penalty to the student.

We would recommend that any early college or dual enrollment courses taken by students and any experiential learning opportunities documented be approved as planned courses and counted toward time requirement. Science and math courses that are directly related to the student's career goal should also contribute to the time requirements.

Finally, we would recommend that a system of industry supported assessments continue to be developed and approved, and that proficiency on these validated exams be recognized as an alternative to time as an indicator of student success.

Your support and assistance with these requests would allow us to meet the needs of the Department for improving the career and technical education system in Pennsylvania without incurring a financial burden that threatens the future of meaningful career education at the Bedford County Technical Center and in other areas of the Commonwealth.

Sincerely,



Mr. Thomas Wakefield, Chair
Bedford County Technical Center Ag/biotech Advisory Committee