



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

Original: 2520

March 3, 2006

Larry Way
President
Pennsylvania Association of Agricultural Educators
224 Pine Street
Harrisburg, PA 17101

Dear Mr. Way:

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

INDEPENDENT REGULATORY
REVIEW COMMISSION

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Pennsylvania Association of Agricultural Educators

224 PINE STREET • HARRISBURG, PENNSYLVANIA 17101
717.234.8814 • FAX 717.214.4437 • E-MAIL fred-brown@comcast.net

March 2, 2006

Dr. Lee Burkett, Director
Bureau of Career and Technical Education
333 Market Street
Harrisburg, PA. 17120

Dear Director Burkett:

On behalf of the Pennsylvania Association of Agriculture Educators (PAAE) I would like to share with you our concerns, objections and recommendations to the changes proposed in Chapter 339, Vocational Standards, Department of Education Regulation 006-298.

The majority of our membership is comprised of agriculture educators at the secondary level who work to improve the lives of our youth through a variety of means that occur both in and out of the classroom. Vocational Agriculture is taught primarily in a comprehensive high school setting. According to 2003-2004 PDE data there are 129 Agriculture Education programs in high schools and 53 Agriculture Education programs delivering instruction through Career and Technology Centers. Additionally, of the 7,885 students enrolled in career Agriculture Education programs in 2003-2004 5,717 receive their instruction in high schools while 2,168 receive their instruction in Career and Technology Centers. This is unique to most vocational programs, which are usually taught in Career and Technology Centers. (See attachments.)

There are a few other vocational programs that exist in greater proportions in a comprehensive high school. They are Business Education, Family and Consumer Sciences, and Cooperative Education.

PAAE believes these programs and the students enrolled in high school based Agriculture Education programs will suffer disproportionately under the proposed revisions to Chapter 339. As a result of changes being proposed in Chapter 339, the reimbursement currently going to students who receive less than 360 hours of class instruction time in their vocational area will end. Given the requirements of No Child Left Behind and those seeking to meet college admission requirements, there is little time left in the schedules of our students today. This proposal will greatly limit their few remaining opportunities.

Our association feels that the use of an hour requirement is antiquated and limits the districts ability to be flexible and creative in structuring and delivering course content. Although the 360 hours minimum hour requirement is part of the existing Chapter 339 Vocational Standards, it has never been used as a condition for program reimbursement. Also, under the current Standards in Chapter 339, the 360 hour requirement did not apply to the 9th grade. The current 9th grade hour requirement is 240. It is our belief this lower hour standard

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provides students the opportunity to experience introductory level programs to see where they feel their career interests may be. Previously, reimbursement was based on having an approved program, a student being enrolled in an approved course of study and a career objective.

In the May 2, 1992 PA Bulletin announcing the revisions to Chapters 3, 5 and 6, which have since been incorporated into Chapter 4, the State Board stated the following rationale in proposing the elimination of the 120-clock hour rule for basic education, they wrote;

“By developing these learning outcomes the Board intends to move the regulations from their current function of setting minimum standards to one of setting high expectations for schools and students. This focus on learning outcomes rather than inputs and processes is accompanied by greater flexibility with respect to those inputs and processes, particularly in the elimination of the 120-clock hour rule for defining high school credits and in the elimination of specific numbers of courses in specified subject areas as high school graduation requirements.”

Vocational education under Chapter 6 was incorporated into the secondary education curriculum by embedding the vocational curriculum, assessment and planning requirements into those of basic education.” That was done to, “...avoid gaps between “vocational” and “academic” opportunities for students...” according to the rationale at that time. This a theme echoed through out “The Jobs for the Future” report.

We believe that the Department should reconsider their position with respect to the mandated minimum of 360 hours, in light of other required courses in addition to taking into account the time required for No Child Left Behind and admission to Post-Secondary Education.

If for some reason there needs to be different criteria on which to base reimbursement on, and that has yet to be articulated, we would recommend that the reimbursement formula for Career and Technical Education be modified to reflect a prorated or sliding scale of reimbursement for the amount of actual contact time a student has in their vocational area. An example of this may be setting the goal at 360 hours, but awarding reimbursement at the same percentage as the student is receiving instruction based on the 360-hour bar. Also, there should be financial incentives for the vocational program for each completer they have transition out of the program.

I think we both understand that our field, because of its diversity, cannot and should not be limited to the classroom environment alone. Agriculture Education is fortunate to have a time tested nationally recognized system for students to document their experiences in agriculture which enhances what they have learned in the school environment. The system I am referring to is the Supervised Agriculture Experience (SAE) record book. The current language of Chapter 339 allows the time documented in this system to count toward meeting minimum time requirements. The proposed language eliminates its use in meeting any minimum time requirement. If the department has any minimum time requirement for determining vocational reimbursement it should not discount this system that is used nationwide, but continue to allow the time students invest in their SAE to be used in meeting any time requirement.

The impact of the 360 hour requirement with an all or nothing approach will negatively affect students in districts where there is no other opportunity for traditional career and technology education. Many students throughout the state do not have the opportunity to attend a school that could create a large enough block of time to meet the hour requirement. The remaining programs that have adapted to their own geographic, economic and social situations by offering vocational education to their students in smaller blocks will be forced to eliminate programs due to lost funding. This proposal will reward a few schools at a great cost to many others who have invested in their students based on the regulations set forth previously. It is shameful to remove the foundation for their work after the infrastructure has already been built.

Some longer-term implications of this proposal include the loss of farmland and open space. Our state is currently spending hundreds of millions of dollars on farmland preservation. However, when many of the areas with a large farm base lose their agricultural education programs due to the hour requirement, who are we training and developing to take over these farms?

We are concerned with other possible ramifications due to funding cuts through the enforcement of mandated minimum classroom hours. The first is that the areas of our state that will feel any cut like this are mostly our agricultural and rural areas. Second without the funding it is inevitable that agriculture and other high school based vocational programs will be reduced or eliminated. One study that supports this fact is "Jobs for the Future" which stated that there was a modest increase in enrollment at ACTES while there was an absolute decline in district high schools. Data from your department however shows that Agriculture Education contradicts this trend. In a comparison of enrollments in AVTS and High School programs between the 1998-1999 and the 2002-2003 school years enrollment in Agriculture Education programs increased 8.6% while the enrollment in AVTS programs declined 4%. A reason for Agriculture Education bucking the trends found in "Jobs for the Future" is that vocational reimbursement to programs in high schools has not increased from the 1998-1999 level due to legislation passed in 2000. Fortunately that legislation did not include a funding freeze for Agriculture Education. Since these programs have continued to receive increases like the AVTS or ACTE schools they have also performed similarly in their enrollment.

Given the current initiatives to promote farmland preservation, we need to continue to support Agriculture Education more not less. We are continually working to improve our programs, which is done effectively through the use of advisory committees. The individuals on these committees represent employers for our graduates, and guide us to make necessary changes to make our completers better able to enter the local workforce. Pennsylvania is too diverse in its agriculture and local school districts to have a general hour requirement such as this be implemented without severe repercussions.

"Jobs for the Future" stresses that we need to make a smooth progression from secondary CTE to postsecondary programs. Enforcement of a minimum 360 hours of in class time will certainly restrict our students ability to meet requirements for entry into post secondary education. There is no minimum time requirement for CTE programs stated in this study, and if we are to follow the suggestions of the study to insist on the same high academic rigor

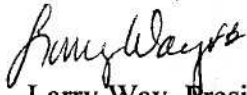
of all students CTE or academic, the hour requirement will actually exacerbate the differences in academic performance.

Over the past decade and more recently through the work of the House Education Committee and the Commission On Rural Education (CORE) Report, policy makers have stressed the need for more student knowledge in agriculture. The report indicated that agriculture education provided rural areas with more opportunities by helping to generate small businesses and keep jobs local for these rural and agriculture areas of the state. One of the ways our programs help in economic development is through the Supervised Agriculture Experience (SAE), where students are guided through entrepreneurial activities that can be developed into small businesses.

In summary PAEE supports most of the proposed implementations of Chapter 339, however, the mandatory minimum 360 hour requirement is an all or nothing criteria that is not achievable in our current education climate with regulations from No Child Left Behind.

We respectfully request you to urge the Department to evaluate other aspects of funding Career and Technical education to allow opportunities for all students by allowing flexibility in meeting hour requirements and providing incentives for completers. Finally, if this proposal is enforced in its current form, the loss in agriculture education will be felt disproportionately to that of other traditional vocational programs. If this occurs the future of our states number one industry and the foundation of our country's strength and self-reliance will be placed at risk.

Thank You,



Larry Way, President