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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

Sherry A. Bunting
1918 Barnett St.
East Earl, PA 17519

Dear Ms. Bunting:

Thank you for your statement letter of February 20, 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 ✓

INDEPENDENT REGULATORY
REVIEW COMMISSION

2006 MAR -6 AM 10:39

RECEIVED

FEB 27 2006

Sherry A. Bunting
Agriculture Writer and
Former School Director
1918 Barnett St.
East Earl, PA 17519

February 20, 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

I am writing to you with great concern for the unintended consequences, which will occur as a result of the proposed enforcement of Chapter 339 minimum-hour requirements. While I fully appreciate the 360-hour purpose for vocational education, I am also quite certain that it will have a far-reaching negative impact upon more than just the valuable agriculture education programs and FFA chapters in Pennsylvania high schools. By far-reaching, I mean: it goes against everything our Governor and State Assembly have done and are doing to attract young people to farming and other agriculture-related careers – many of which require a college education after high school.

I believe I can speak well to the issues because I have been an agriculture writer and editor for two agriculture newspapers over the past 25 years, and I have served on the Eastern Lancaster County School District Board of Education as an elected School Director for seven years (1994 through 2001). I have also served on the Elanco Ag Advisory Council, and in 1994 I was privileged to attend the National FFA Convention in Kansas City, where some of our students competed in national contests. I was not raised on a farm; however, I worked on a farm to pay for my college education. As a parent of three children, I have seen evidence of the overall benefits from the presence of agriculture education in the high school they attended, and the specific benefits for one of my children as a member of the FFA. I have also witnessed the many important career paths chosen by Garden Spot FFA members over the years, and I am keenly aware that these students are a hot commodity in the job market because they possess a greater understanding of food production and life science concepts, as well as their development of a strong work ethic in a team environment.

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On February 7, 2006, Governor Edward Rendell made a surprise appearance at the state convention banquet of the Pennsylvania Young Farmers Association (PYFA). As he entered the banquet room, a reporter from the *Lancaster Intelligencer Journal* asked the governor why he came. The governor's reply was very telling, he said: *"I came here tonight because Pennsylvania agriculture is one of the things that has concerned me the most in my three years as governor. This is Pennsylvania's largest employer, and it kicks off \$44 billion a year to our economy. One of the things that troubles me most is: where are the farms of the future going to come from? Preserving the land is only one small part of the battle. We have to make sure people who want to farm – can farm in an economically sustainable way. And we want to make farming a career that our young people will want to do."*

Agriculture education programs in Pennsylvania high schools have long been precursors to college educations for many students pursuing careers in farming as well as a long list of important ag-related careers where post-secondary education is required. Without sufficient numbers of young people choosing farming and other ag-related careers, what will happen to our state's number one industry and the \$44 billion it kicks into our state's economy?! This is not only my concern... it is a great concern, which has been frequently voiced by our governor.

A minimum-hour requirement of 360 hours per 180-day-school-year per enrolled student in agriculture education, puts our state's high school agriculture education programs at great risk. This requirement funnels more funds to vocational schools or career technology centers where these hourly criteria can be met. In the high school setting, students would have to spend two hours per day in agriculture education to meet the minimum-hour reimbursement scheme according to Chapter 339. The logistics of this are not probable. Students who are taking college prep courses already skip study halls and make tough choices to include agri-science classes and FFA in their schedules. The Chapter 339 hourly requirement would make this **impossible** from the perspective of school scheduling and student coursework.

The requirement of 360 hours of instruction could potentially eliminate every agriculture education program in the state except for those programs in career and technology schools. Further disconcerting is the fact that most agriculture education programs coexist with FFA and are mainly provided by high schools – not career technology centers. Relegating agriculture education to only the career technology centers would be an injustice to these programs because many of the students involved in these high school programs go on to state land grant universities where they pursue careers and research in agriculture and related fields.

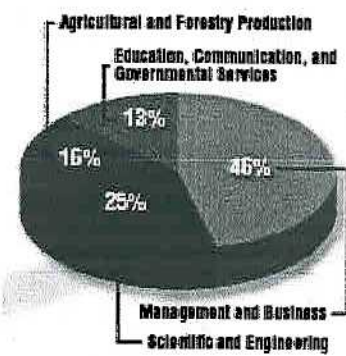
Consider this fact: At Garden Spot High School (Elanco school district) for example, an historically larger percentage of the students who are enrolled in agriculture education go on to college compared with the percentage of students in the school's population at-large. This is probably also true in other Pennsylvania high schools and should be investigated and considered!

According to the Farm Bureau and the Food and Agriculture Education Information System (FAEIS), an agriculture career does not always involve production farming. In fact, only 10 percent of the more than 20 million people who work in the agriculture field are traditional farmers. **The rest are employed in any of the more than 200 agriculture-related careers that are available!** The variety of these careers is growing, not shrinking.

Agriculture is science-based, high-tech, and offers a variety of career possibilities, including animal and plant research, animal health specialties, veterinary medicine, biotechnology, biochemistry, food science, nutrition, commodity trading, market analysis, forest management, agriculture and environmental journalism, banking, sales, food processing, wildlife/natural resource management, and much more.

According to a report published by the U.S. Department of Agriculture (USDA) and Purdue University, employers in food, agriculture, and natural resources will be competing for students with management and business skills over the next five years. Their report: "Employment Opportunities for College Graduates in the U.S. Food, Agriculture, and Natural Resources, 2005-2010," forecasts a great demand for graduates with specific skills. The report is based on statistics produced by the USDA, the U.S. Bureau of Labor Statistics and the National Center for Education Statistics. (See Employment Opportunities pie chart on this page, and visit <http://faeis.usda.gov/supplydemand/2005-2010> for more information).

Employment Opportunities



The report notes that annual job openings for students with expertise in food, agriculture, and natural resources are expected to be around 52,000, with slightly more than 49,300 skilled graduates. Graduates will find the most opportunities in business and management, with 24,000 annual openings and only 20,200 qualified applicants.

The report indicates that the careers with the greatest demand will be sales and marketing, food safety and biosecurity, food system biotechnologies, and consumer information technologies. The report identifies four major factors that will influence employment opportunities over the next five years: changing population demographics will add opportunities in health and life sciences; continued business mergers will affect available job openings; advancements in science and technology will create jobs for students with strong technical skills; and food security and environmental issues will remain key topics.

This report underscores the need for agriculture education in Pennsylvania high schools along with a better understanding among the educational community about the career outlook in agriculture-related fields. The majority of these technical careers require post-secondary education, which means agriculture education programs are needed in our high schools to serve as a springboard for the pursuit of these in-demand career paths.

Today, more than ever, agriculture education is not just farmer education. While farm students in rural communities benefit tremendously, these programs reach much farther to stir the interest and understanding of whole populations of students – some of whom may never have even visited a farm before taking an agriculture class. For example, students at Garden Spot High School may select either earth and space science or agri-science for their ninth grade science credit. The course is a pre-requisite for selecting FFA; however, many students select the agri-science course even if they are not selecting FFA. This opens doors of opportunity and understanding for more students.

High schools with agriculture education and FFA programs also foster understanding of agriculture among the rest of the student population. Their projects and presence in the educational system help ensure that future generations of students have some understanding about where their food comes from. The 2007 Science Anchor Assessments for grade 11, for example, have included criteria in environmental and ecology education; however, agriculture is noticeably absent. It is curious that students can be expected to grasp environmental and ecology concepts without sufficient grasp of agriculture concepts. This seems a lop-sided approach.

The Pennsylvania Department of Agriculture's mission states: "To encourage, protect and promote agriculture and related industries throughout the Commonwealth." Such promotion begins with the minds of Pennsylvania's students. PDA provides much support for "Ag in the Classroom" initiatives. However, if the Chapter 339 minimum-hour requirements are applied to agriculture education, along with the proposed changes to science standards (2007 Anchor Assessments), it will be difficult or impossible to strengthen or even maintain the current status of agriculture education in the schools of the Commonwealth. Unless there is action to prevent this: Pennsylvania will feel a new kind of "brain-drain." We cannot begin to appreciate the far-reaching effect this will have on our state's economy and the food on our table.

I fully realize that the Bureau of Career and Technical Education does not have jurisdiction over the Science Anchor Assessments proposed by PDE. However the Bureau does have a responsibility to look at the big picture in determining how it applies Chapter 339 minimum-hour requirements to the important business of agriculture education in our high schools.

In the June 30, 2005 minutes for the State Board for Vocational Technical Education, public comment was received from Fred Brown (PA Office of Agriculture Education). He expressed his concerns and apprehension regarding the minimum-hour revisions to Chapter 339. Brown encouraged the Board to review and reconsider these concerns before acting on the issue. However, the Chapter 339 Vocational Education Program Approval Standards were then approved by unanimous vote at that meeting. I implore the Bureau of Career and Technical Education, the Department of Education, and the Internal Regulatory Review Commission to rescind the application of Chapter 339's minimum-hour requirements as pertains to high school agriculture education classes.

PYFA thought this subject was so important that they made it the topic for the public speaking portion of their Spokesperson for Agriculture contest last week. Contestants spoke eloquently to this issue – driving home the point that since agriculture is Pennsylvania’s number one industry, then Pennsylvania’s educational system should recognize and treat it as such. This is particularly important as our state is at a crossroads with our governmental leaders pushing to keep interest in agriculture alive in our youth. The educational opportunities we provide in Pennsylvania schools today will determine the interest and ability of future generations and our state’s ability to continue producing food and renewable energy -- tomorrow. We are talking not only of the necessities of life, but also of our economy.

During the PYFA banquet on Feb. 7, Governor Rendell said: “This is a difficult transition time... as we try to get people to stay in farming, and get young people to choose it.” His remarks were forward-focused on our state’s young farmers. This includes the young people who are involved in the multitude of ag-related careers mentioned earlier. Before the governor spoke, Secretary of Agriculture Dennis Wolff made this observation: “The future belongs to those who see it first.”

The Pennsylvania Department of Education **MUST** see this future. The policies created within PDE will impact the minds of generations to come. I am not alone in my concern about the double-whammy consisting of 360-hour requirements applied to agriculture education programs in our high schools and the removal of agriculture concepts from the state’s science standards as evident in the proposed 2007 Science Anchor Assessments. They foretell a bleak future. Without reimbursement for agriculture education classes, and without reference to agriculture in the science anchors and PSSA testing – schools will be unable to strengthen, or even continue their current levels of agriculture education in the Commonwealth.

If the Pennsylvania Department of Education does not value agriculture’s importance, our future generations will have few opportunities to learn about agriculture, its career opportunities, and the backbone it provides to our state’s economy.

Thank you for your consideration of this very important matter.

Sincerely,



Sherry A. Bunting

Proprieter

Agriculture Writing and Photography Services

Former Elanco S.D. School Director (1994-2001)

CC: Internal Regulatory Review Commission
Senator Noah Wenger
Rep. Gordon Denlinger