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INDEPENDENT REGULATORY
REVIEW COMMISSION

March 8, 2006

Independent Regulatory Review Commission
14th Floor, Harristown 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 Aldo Jackson 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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INDEPENDENT REGULATORY
REVIEW COMMISSION

March 7, 2006

Aldo Jackson
Director
Erie County Technical School
8500 Oliver Road
Erie, PA 16509

Dear Dr. Jackson:

Thank you for your statement letter of March 6, 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 ✓



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2006 MAR 13 AM 8:44

March 6, 2006

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dr. Lee Burkett
Acting Director
Bureau of Career and Technical Education
Pennsylvania Department of Education
333 Market Street, 6th Floor
Harrisburg, PA 17126-0333

VIA FACSIMILE

RE: Public Comment: Chapter 339 Standards

Dear Dr. Burkett:

The following comments regarding revisions to the Chapter 339 Vocational Education Standards are submitted for your consideration. By virtue of a recently adopted resolution, all 11 superintendents whose school districts support the Erie County Technical School take exception to the proposed revisions to Chapter 339 as published in the February 4, 2006 Pennsylvania Bulletin.

The school districts of Northwestern Pennsylvania have made a concerted effort to insure that all students are well prepared to pursue the career of their choice upon graduation. In doing so, the districts have redesigned high school curricula to offer relevant and rigorous courses that prepare students for successful employment in today's world. The districts have used School-to-Work, Tech Prep and vocational funding to support the newly designed programs. Access to these funds is essential to their continued success.

Revised and enforced Chapter 339 Standards will virtually eliminate access to Tech Prep and vocational funding for district-based programs that are a vital component of our workforce development efforts. The proposed revisions to Chapter 339, primarily the rigid definition of "completer" and the requirement of 360 hours annually, will eliminate all vocational funding to career and technical education programs offered at the comprehensive high schools across the Commonwealth.

These district-based programs meet the other important requirements and the intent of the Chapter including those delineated in Section 339.4 including the requirement that sending schools and career and technical schools plan instructional programs jointly, and the requirement for students to complete the educational and occupational objectives form annually.

The district-based programs also embrace Sections 339.21 and 339.22. Section 339.21 adds a requirement that guidance counselors help students make informed decisions related to academic achievement and post-high school opportunities. The districts concur with Section 339.22, including:

- stating that the purpose of approved programs is to prepare students for high priority occupations, successful employment and post secondary education,

Dr. Burkett
March 6, 2006
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- reinforcing Chapter 4 and the integration of academic standards into the career and technical education curriculum,
- requiring that planned instruction includes academics, and,
- reinforcing the requirement for schools to develop secondary and post secondary articulations.

We believe the focus on academic standards as a requirement for quality vocational programs to be appropriate. As such, it is logical, indeed necessary, to include the academics as part of the 360-hour requirement. Doing so is consistent with the overall intent of the chapter, the goals of Project 720, the recommendations of the Jobs for the Future Report and the agenda for "Job Ready PA."

The proposed language of Chapter 339, especially the 360-hour requirement to designate a completer and allow access to vocational funding, is inconsistent with the Jobs for the Future Report. That report specifically recommends taking steps to: a) integrate career and technical education with broader secondary school reform efforts, and b) improve the quality of career and technical education at the secondary level in meeting Pennsylvania's education and workforce needs. The proposed language effectively eliminates funding for district-based programs, thus discouraging the development of effective career and technical education programs.

Some program approval based on a shorter time requirement is necessary to expand the capacity of secondary career and technical education programs. The superintendents of the sending schools and the director of the Erie County Technical School have two recommendations. First, that some part of the academic course requirements offered at the secondary schools be counted as part of the 360-hour requirement. Additionally, we recommend modifying the 360-hour requirement to include an hourly requirement that approximates 240 hours for district-based programs. This second recommendation includes consideration for partial funding of the 240-hour programs.

Your consideration of these points and the possibility of further public comment prior to adoption of the changes to Chapter 339 is appreciated. In addition, the Superintendents of Northwestern Pennsylvania would welcome the opportunity for further discussion regarding Chapter 339 and the funding that is essential to the development of Pennsylvania's workforce and the future success of career and technical education programs in our Commonwealth.

Respectfully yours,



Aldo R. Jackson, Ph.D.
Director

cc: Mr. Jim Buckheit, Executive Director, State Board of Education
Dr. Gerald L. Zahorchak, Secretary of Education

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Erie County 2006 MAR 13 AM 8:45

Technical School

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To:	DR. LEE BUNKETT	From:	ALDO JACKSON
Fax:	717-783-6672	Pages:	2 Pages plus cover page
Phone:		Date:	3/6/06
Re:		CC:	

Urgent

For Review

Please Comment

Please Reply

● Comments:

CH. 339 Public Comment

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