

Original: 2520



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

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2006 MAR -8 AM 8:46

INDEPENDENT REGULATORY
REVIEW COMMISSION

March 7, 2006

Independent Regulatory Review Commission
14th Floor, Harrisburg 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 email from Betsy E. Huber 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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2006 MAR -8 AM 8:47

INDEPENDENT REGULATORY
REVIEW COMMISSION

March 6, 2006

Betsy E. Huber, Master
PA State Grange
20 Erford Road, Suite 310
Lemoyne, PA 17043

Dear Ms. Huber:

Thank you for your statement e-mail of March 6, 2006 on proposed 22 Pa. Code, Chapter 339 Vocational Education.

Your e-mail 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 ✓

Burket, Lee

RECEIVED

From: Master [master@pagrange.org]
Sent: Monday, March 06, 2006 3:25 PM
To: lburket@state.pa.us
Subject: Chapter 339

2006 MAR -8 AM 8:47

INDEPENDENT REGULATORY
REVIEW COMMISSION

Attached is a comment letter regarding the revision to Chapter 339 regulations.

Thank you.

Betsy E. Huber
PA State Grange

3/6/2006

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INDEPENDENT REGULATORY
REVIEW COMMISSION

March 6, 2006

Robert G. Barlett, Director
Bureau of Career and Technical Education
333 Market Street
Harrisburg, PA 17126-0333

Dear Mr. Barlett:

The Pennsylvania State Grange is deeply concerned about the proposed enforcement of Chapter 339 regulations requiring a student to log 360 hours of instruction in any vocational area in order for a school district to receive reimbursement.

Requiring 360 hours of classroom instruction for vocational agriculture will be impossible for the majority of high schools to meet. Only about 20 percent of the aged programs in the Commonwealth currently meet this requirement, essentially those in vocational-technical schools. For those students not having access to a vo-tech school agriculture program, the 360-hour requirement, or three periods per week, will be impossible to schedule because of No Child Left Behind and PSSA standards.

We feel that agriculture education, because of its diversity, should not be limited to the classroom alone. Previous regulations allowed the Supervised Agriculture Experience documented time to count toward meeting the minimum time requirements. The proposed language eliminates the use of these records or hours in meeting any minimum requirements. If the Department enforces a minimum time requirement for determining vocational reimbursement it should continue to allow the SAE system which is used nationwide to document time spent in learning outside the classroom.

The Grange is also concerned that funding cuts that will occur if these regulations are enforced will disproportionately affect rural and agricultural areas. If funding is cut in these areas the schools will be forced to cut or eliminate agricultural vocational programs. Pennsylvania is a leader in farmland preservation and we need to ensure that we are training future farmers to work these acres that have been permanently preserved.

The Pennsylvania State Grange urges you to take these comments into consideration in revisions to Chapter 339 regulations. Thank you.

Sincerely,

Betsy E. Huber
Master