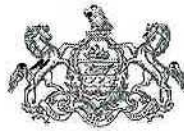


Original: 2520



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 8, 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 email from Jacqueline Stash 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 cursive script, appearing to read "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

Jacqueline Stash
Director, Northeastern PA Tech Prep Consortium
Luzerne County Community College
1333 S. Prospect St
Nanticoke, PA 18634

Dear Ms. Stash:

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 ✓

Keisling, Tammy

RECEIVED

From: Burket, Lee
Sent: Wednesday, March 08, 2006 11:48 AM
To: Keisling, Tammy
Subject: FW: chapter 339

2006 MAR 13 AM 8:45

INDEPENDENT REGULATORY
REVIEW COMMISSION

-----Original Message-----

From: jstash@luzerne.edu [mailto:jstash@luzerne.edu]
Sent: Monday, March 06, 2006 4:10 PM
To: lburket@state.pa.us
Cc: swill@state.pa.us
Subject: chapter 339

Hi Lee,

I know we have had this conversation and some things are out of your control, and the bureau is buried in work, but for what it is worth, here are a few items I thought should be considered with enforcing the 360 hour requirement in chapter 339. BTW it made the front page of the farming paper. The FFA chapters are really concerned about the negative impact it will have on the majority of state Ag programs (other than hort programs at avts'). All of this is based on the idea that most hs based programs are not currently meeting the 360 hour requirement, even though they may be standards based.

I recall the industry people at the DCED meeting talking about the unlikelihood of hiring high school grads in the 2+2+2 programs since most of the high tech jobs really need at least an associate degree. This is also echoed in the 2006 paper "Strengthening Transition by Encouraging Career Pathways: A Look at State Policies and Practices" which begins by stating, There is now common agreement that all youth need some education beyond high school to be economically self-sufficient. We struggle here to convince kids the \$8.00/hr co-op job they plan to take full time after graduation will not support them.

I was also reviewing some of the PDE data and saw that (if you remove 'not otherwise classified' from the hs mix since no t/p kids were reported in it anyway) tech prep kids complete cte programs at a higher rate than non-tech prep at both avts's and hs's. Also, the three year trend in completers is consistently rising for hs completers (32.7% in 2002, 35.3% in 2003 and 39% in 2004) and is flat for avts's (71.4% in 2002, 72.3% in 2003 and 70.9% in 2004) . This trend has occurred during a time when enrollments at avts's were declining and hs enrollment increasing.

When comparing advanced academic courses of completers over a period from 1998 to 2004, hs cte students consistently passed these courses at a rate of about 15% to 23 % greater than avts cte completers. My guess would be that they had greater access to higher level courses due to proximity (not having to leave their home school to go to the avts) and also more flexibility in the schedule because they did not leave after three academic periods and were not required to take three-four shop periods daily. For instance, in 1998, 29% of avts students completed alg 1. This number has inched up to 36.4% in 2004. At the same time, hs cte students started with a success rate of 46 % in 1998 and had moved up to 59% by 2004. The numbers are similar for all academic courses listed.

I also looked at follow-up surveys of cte graduates over several years (classes of 2001-2003). Predictably, avts grads were employed in a related field at a higher rate than hs cte students (avg of 28% to 14%) at the same time, hs cte completers were attending college at a rate of 53% vs 34% for avts completers. Something I thought was interesting is that in almost every program area, avts cte completers were employed in a non-related job at a rate slightly higher than hs completers. (I am still trying to figure out how that is a positive outcome since continuing college in a non-related field is not a positive outcome of tech prep)

Lastly, I have a concern that if schools cannot or chose not to comply with the 360 hour requirement and PDE approvals are rescinded, we will have kids being taught by non-certified teachers thinking they are being taught by content experts and we lose control over curriculum. There are many business programs at non-approved schools being taught by

English, social studies or math teachers and tech ed programs advertising themselves as engineering because they have a computer program that provides 3-d modeling or 'virtual' instruction in basic circuits etc. With local autonomy and removed oversight of the bureau, schools can call programs anything they like and staff them in a way that best suits their faculty staffing or scheduling situation. I do not think they would purposely hurt students, but many administrators believe anyone can teach many of the business courses. As far as Ag goes, many schools may not be able to afford keeping the programs if they were to lose subsidy. You know many of them are in rural schools with tight tax bases if they have any. My resident school district only graduates 40-45 kids a year but had 10 keystone scholars in FFA this year!

By now you know I am opposed to the hour stipulation which i believe should not be part of a 'standards' based program. Viable programs should be based upon content driven by industry standards and local input (reviewed and approved for offering by pde), measured by attainment of standards (PSSA and NOCTI or other), graduation rates, college attainment, related employment etc. I just feel that by not allowing for variances from the hour requirement, we are conducting the oversight with a sword when it requires a scalpel. There are many good programs that are less than 360 hours. As long as the enrollment reporting is done accurately we can help schools to improve their completion data.

Thank you for listening to my rambling. It may not mean a thing in the end but I felt the need to support my schools as they work to deliver high quality programs to kids. We are not all there yet but constantly moving forward. I spend a lot of time with the data trying my best to improve tech prep in my region and I want to believe it has helped occupational programs as well.

Still a friend (I hope)

Jackie

Jacqueline Stash
Director, Northeastern PA Tech Prep Consortium
Luzerne County Community College
1333 S. Prospect St
Nanticoke, PA 18634
1-800-377-5222 ext. 681
jstash@luzerne.edu

"Peace cannot be kept by force, it can only be achieved by understanding."
Albert Einstein