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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 7, 2006

Independent Regulatory Review Commission  
14<sup>th</sup> 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 letter from Edward McAtee 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](mailto: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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DEPARTMENT OF EDUCATION

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2006 MAR 13 AM 8:46

INDEPENDENT REGULATORY  
REVIEW COMMISSION

March 7, 2006

Edward C. McAtee  
Director  
Northwest Tri-County Intermediate Unit  
252 Waterford Street  
Edinboro, PA 16412

Dear Mr. McAtee:

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

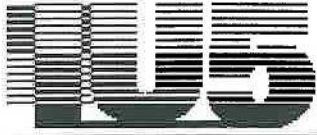
Your letter is considered as official public comment. Pursuant to the provisions of the Regulatory Review Act, copies of your comments will be provided to the Independent Regulatory Review Commission (IRRC) and the Chairpersons of the House and Senate Education Committees.

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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NORTHWEST TRI-COUNTY INTERMEDIATE UNIT

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252 Waterford Street  
Edinboro, Pennsylvania 16412  
PHONE 814-734-5610  
FAX 814-734-5806  
<http://www.iu5.org>

INDEPENDENT REGULATORY  
REVIEW COMMISSION

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

March 6, 2006

**RE: PUBLIC COMMENT, CHAPTER 339, VIA FACSIMILE**

Dear Dr. Burket,

I am writing on behalf of the school districts participating in the Northwest Pennsylvania Tech Prep Consortium that will be impacted by the adoption of Chapter 339, specifically as it addresses hourly program requirements. Our Consortium spans six counties and currently includes 8 participating school districts and 6 Career and Technical Centers. With Chapter 339 in force, only the programs in our CTCs are likely to be able to continue. Factors such as school size, number of programs available to students, scheduling, PSSA requirements and academic preparation all impact on the student's ability to meet this mandate.

The Tech Prep program benefits many students in our local high schools who would not otherwise be exposed to technical education. Career and Technical Schools in our region presently serve about 10% of the high school population. Of this number, 33% - 48% represent students with an IEP and special needs. Looking at these statistics, CTCs will only be able to prepare about 6% of non-IEP students to meet the highly technical demands of the local workforce. Additional technical preparation programs are clearly needed in our schools.

When Chapter 339 was initially adopted in 1949, Tech Prep did not exist. It has always been our belief that rigorous academics combined with high demand technical programs in preparation for post-secondary training comprised the Tech Prep Program. It is also our belief that a strict adherence to seat time does not guarantee outcome, and students should be assessed on what they have learned and what they can "do" upon completion of their program. Tech Prep provides the student with the ability to get exposure to careers, plus the rigorous academics for post-secondary success.

In closing, we would ask that you look carefully at the impact the proposed revision of Chapter 339 will have upon our students, and many, many others across Pennsylvania. Please consider other options, especially in light of Tech Prep, such as 240 hour programs with rigorous and required academics. High schools will find these hours more manageable and students will still be able to get the preparation and exposure to career and technical education in the home schools that is so valuable to them and to our regional economy.

Sincerely,

Edward C. McAtee  
Director, School and Management Services/Tech Prep

cc: Dr. Gerald Zahorchak