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INDEPENDENT REGULATORY  
REVIEW COMMISSION



Leadership for Public Education

400 North Third Street  
PO Box 1724  
Harrisburg, PA 17105-1724  
(717) 255-7000 • (800) 944-PSEA (7732)  
Fax: (717) 255-7128 • (717) 255-7124

[www.psea.org](http://www.psea.org)

James R. Weaver, *President*  
James P. Testerman, *Vice President*  
Grace E. Bekaert, *Treasurer*  
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March 6, 2006

John R. McGinley, Jr., Esquire  
Chairman  
Independent Regulatory Review Commission  
333 Market Street  
Harrisburg, Pennsylvania 17101

RE: 22 Pa.Code Chapter 339 – Vocational Education  
Proposed Regulation 6-298  
State Board of Education

Dear Mr. McGinley:

PSEA submits these comments with regard to Proposed Regulation 6-298 (22 Pa.Code Chapter 339) submitted to you by the Pennsylvania Department of Education.

Chapter 339 includes a provision that will eliminate vocational funding for all vocational programs that do not provide at least 360 hours of instruction per year. In Pennsylvania, a significant number of the vocational programs that are provided within the school district setting (as opposed to the programs provided through Career and Technology Centers) do so with fewer than 360 hours. It is these district-based programs, and the students who are currently well-prepared by these programs for careers and for higher education, that would suffer from the loss of vocational funding. Furthermore, the Commonwealth has an interest in maintaining these programs, many of which support its agricultural needs.

An alternative to eliminating funding for these programs would be to provide funding on a pro-rated basis. I.e., 100 percent funding could be provided to programs that offer 360 hours instruction per year; two-thirds funding could be provided for programs that offer 240 hours of instruction per year. In addition, an exception to minimum hour requirements should be made for 9<sup>th</sup> grade courses, which tend to be exploratory for students.

We appreciate your consideration of PSEA's comments when the Commission reviews the Chapter 339 Proposed Regulations.

Sincerely,

Carol L. Karl  
Assistant Director for Government Relations

cc: Mr. Kim Kaufman, Executive Director, IRRC  
Mr. Karl Girton, Chairman, State Board of Education  
Mr. James Buckheit, Executive Director, State Board of Education  
Mr. David Namey, President, VPAE

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To advance quality public education for all students while fostering the dignity and worth of members through collective action.

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