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COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF EDUCATION  
333 MARKET STREET  
HARRISBURG, PA 17126-0333  
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INDEPENDENT REGULATORY  
REVIEW COMMISSION

March 14, 2006

Independent Regulatory Review Commission  
14<sup>th</sup> 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 Carol Karl 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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REVIEW COMMISSION

March 14, 2006

Carol Karl  
Assistant Director for  
Government Relations  
PSEA 400 North Third Street  
P.O. Box 1724  
Harrisburg, PA 17105-1724

Dear Ms. Karl:

Thank you for your statement letter of March 6, 2006 sent to the IRRC and copied to the State Board of Education 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 ✓  
Mr. James Buckheit

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Leadership for Public Education

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James P. Testerman, *Vice President*  
Grace E. Bekaert, *Treasurer*  
Carolyn C. Dumaresq, *Executive Director*

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, IRRRC  
Mr. Karl Girton, Chairman, State Board of Education  
✓ Mr. James Buckheit, Executive Director, State Board of Education  
Mr. David Namey, President, VPAAE

The PSEA Mission

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

Affiliated with the National Education Association