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**PENNSYLVANIA ASSOCIATION OF
AGRICULTURAL EDUCATORS**

November 9, 2001

John McGinley, Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA. 17101

Dear Chairman McGinley,

Mr. Chairman and members of the Independent Regulatory Review Commission, I am writing on behalf of the Pennsylvania Association of Agricultural Educators regarding the pending regulatory package 6-273 from the State Board of Education.

The officers and members of PAAE want me to express their sincere appreciation to you the Commission and staff for the supportive comments raised over the years regarding the issue of Agriculture Education.

I regret that we must write again to point out the failure of the State Board to recognize and comply with Act 26 of 1995, the Agriculture Education Act, but Chapter 4 as well. However, they continue to ignore your recommendations, those of the standing committees and our many recommendations and submissions that would help them shape a standard that will give meaning to the provisions contained in Chapter 4.

As you no doubt recall the Commission's October 8, 1998 comments during the consideration of Chapter 4 indicating that, "... the board should consider adding agricultural education as a separate course of instruction within the listing of curricula in paragraph (g)." Chapter 4 as it was finally approved did not contain that recommendation. Further, the Commission recommended including for consistency under Section 4.23 (c) (5) relating to the plan instruction for Environment and Ecology at the high-school level, again the board failed to include this recommendation.

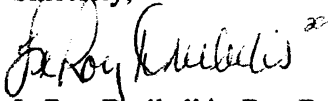
Even though the State Board failed to include the latter recommendation in the Environment and Ecology Standards as they are presented to you the Environment and Ecology Standards are more inclusive and more representative of what we believe should have also appeared in the Science and Technology standards.

Specifically, regarding the Science and Technology academic standards the Commission urged the State Board, in its June 21, 2000 comments to, "...more closely align the Standards with the existing language in Chapter 4 by including agricultural science under the science and technology standards." While the Board made specific reference to agricultural science under the Technology portion of the Standards, those additions pale in comparison to the level of attention the board gave the subject in the Environment and Ecology Standards.

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While we're disappointed with the disregard that the Board has shown to the mandate of law and their requirements of its own Chapter 4, I know these regulations will be approved. I would however ask that the Commission remained as vigilant as we will be in as much as Chapter 4 will once again be the subject of Regulatory Review in the not too distant future.

Sincerely,

A handwritten signature in cursive script, appearing to read "LeRoy Dreibelbis", with a small mark at the end of the line.

**LeRoy Dreibelbis, Past President
Pennsylvania Association of Agricultural Educators**