



Minnesota Technical College System
State Board of Technical Colleges

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COMMENTS ON
RULES & REGULATIONS
FOR ADULT VOCATIONAL EDUCATION
Drafted September 19, 1977

Comments Prepared
October 5, 1977
Adult Agriculture Advisory Committee
Gene Francis, Chairman

COMMENTS ON PROPOSED RULES & REGULATIONS

Drafted September 19, 1977

For Implementation July, 1, 1978

Prepared by Adult Agriculture Advisory Committee

The Adult Agriculture Advisory Committee appointed by the State Department of Education, Vocational Division has had an opportunity to review the proposed rules and regulations for the conduct of adult vocational programs. The committee has been kept informed by the Ad Hoc committee appointed for the purpose of advising on the drafting of rules and regulations for adult agriculture programs, of the steps and procedures followed in arriving at the current draft of the proposed rules and regulations. It is because of the disparity between the proposed rules suggested by the Ad Hoc rules and regulations committee and the draft copy of the rules and regulations as prepared by the State Department of Education that prompts the Adult Advisory Committee to respond in this formal way to the proposed rules and regulations.

There are three assumptions that the committee makes in responding to the draft copy of the rules.

The first assumption is that the program of adult farm management education is a sound educational program. The evidence is strong. The program has been operating under essentially the same set of guidelines for 25 years and had served thousands of farm families. The current enrollment alone numbers more than 5000 farm families. In addition, the program has been adopted in its entirety, including its operational format by 11 other states in the United States with three other states now seeking to build a liaison with the Minnesota program. Research studies have shown a tremendous economic cost/benefit for the state, with the communities building their economic base by at least \$9.00 for every dollar of public and private money expended.

would be discriminated against if they chose to seek enrollment in the program. Nor should it be assumed that there was intent to discriminate against adult instructors of farm management education by defining the minimum acceptable program enrollment to be more rigorous than that required in other disciplines or at other levels of vocational education.

It is with these assumptions in mind that the Adult Advisory Committee strongly urges that the rules and regulations for adult farm management education be amended as described in the paragraphs which follow. These amendments are offered under the premise that rules and regulations are for the purpose of defining the minimum condition under which state and federal dollars, as appropriated in the Act can be paid to schools for the purpose of compensation for offering vocational programs in their community. They are the criteria by which the administrative staff of the State Department of Education can adjudicate the payment of vocational aids. They outline the specific criteria a program at a local educational agency must meet to be qualified as a vocational education program under the Act.

All amendments to the rules and regulations will be referenced by paragraph to the proposed rules for Adult Vocational-Technical Education, dated "Drafted September 19, 1977" and attached to this paper as exhibit A.

Amendments to Section B, Paragraph 6

Amend B.6 to read as follows:

6. Full-time, year around, adult programs shall meet the following criteria.

Rationale for the Amendment

There are basically only two forms of full time adult programs in operation, Farm Management Education and Small Business Management Education. Since

these programs can operate effectively only if they function on a year around basis, it seems appropriate to further delimit their definition by specifying the year around character of the programs as part of the descriptor.

Section B, Paragraph 6b

Delete the present Section B, Paragraph 66 and replace with the following:

Section B, Paragraph 66:

Full time, year around. Farm management education programs which have been eligible for vocational aid for three (3) fiscal years, commencing after July 1, 1978 shall have a minimum enrollment of 30 cooperators who have been enrolled 6 full years or less in the farm management education program and have a minimum of 1200 contact hours of instruction per year. When more than one adult farm management programs is operated within a district, enrollment shall average at least 30 cooperators who have been enrolled in farm management education for 6 full years or less and an average of 1200 contact hours of instruction. Of cooperators who have been enrolled for one full year or more, as measured from July 1st of any calendar year, 80% or more shall have an annual analysis of their farm business.

Programs may be offered at less than full time, but not less than year around, by prior agreement with the assistant commissioner of vocational education or his authorized designee. When such programs are authorized, the minimum enrollments and contact hours shall be defined as the pro-rata percentage of the full time programs as defined in the paragraph above.

Rationale for the Amendment

The farm management program has been in operation in Minnesota for 25 years, commencing in 1952 under essentially the same instructional format that is used today. Because of its long history, there is a great deal of historical

TABLE 1 - 1976-77 - 100% Time Adult Instructors, Categorized by Farm Management Families and Records Analyzed With Average Non Formal And Enterprise Instruction

**No. of Analyses
Families With Completed
An Analysis**

	65 - +	60-64	55-59	50-54	45-49	40-44	35-39	30-34	25-29	0-24	TOTAL
65 - +	2 24	2 105	1 87	2 81	1 27						8
	30	145	0	20	19						
60 - 64				3 72	1 26	1 0	2 121	1 162			8
					0	97	152	125			
55 - 59				2 62	1 180	1 48					4
				67	0	260					
50 - 54				1 0	3 25	9 24				1 114	14
				18	62	72				84	
45 - 49					2 95	1 46	2 80	3 3			8
					4	89	82	57			
40 - 44						1 0	6 46	2 51	1 98		10
						38	35	50	57		
35 - 39							2 82	3 10	2 50	1 0	8
							9	7	140	30	
30 - 34								4 36	3 46		7
								31	161		
25 - 29										9 36	9
										93	
0 - 24										2 115	2
										35	
TOTAL											78

Number of Teachers 2 24 ← Average no. of people served in Non Formal Instruction

30 ← Average no. of people enrolled in Enterprise and Non Formal Instruction