

Regulatory Analysis Form

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REVIEW COMMISSION



(1) Agency

Department of Education

(2) I.D. Number (Governor's Office Use)

6-272

IRRC Number: 2183

(3) Short Title

State Board of Private Licensed Schools

(4) PA Code Cite

22 Pa. Code Chapter 73

(5) Agency Contacts & Telephone Numbers

Primary Contact: Sharon Lane

(717) 783-8228

Secondary Contact:

(6) Type of Rulemaking (check one)

Proposed Rulemaking ☒ X

Final Order Adopting Regulation

Final Order, Proposed Rulemaking Omitted

(7) Is a 120 -Day Emergency Certification Attached?

No: ☒ X

Yes:

(8) Briefly explain the regulation in clear and nontechnical language.

The regulation proposes to amend 22 Pa. Code §73.1 by providing a new definition for "Seminar" and revising the definition of "Nonresident."

The regulation proposes to amend 22 Pa. Code §73.151 (relating to fees) as set forth in Annex A. The proposed amendment to §73.151(a) prescribes a new fee for schools that only present seminars, and revised fees for biennial school licensure or registration of all schools, and licensure of admissions representatives.

The proposed amendment to §73.151(b) increases the User Fees for other services provided by the Board, which are in addition to the processing and issuance of original or original or renewal school licenses, registration or seminars and admissions representative licenses.

(9) State the statutory authority for the regulation and any relevant state or federal court decisions.

Sections 4(a) and 10(a) of the Private Licensed Schools Act, Act No. 174 of 1986 (24 P.S. §§6504(a) and 6510(a)).

Regulatory Analysis Form

(10) Is the regulation mandated by any federal or state law or court order, or federal regulation? If yes, cite the specific law, case or regulation, and any deadlines for action.

Yes. Section 4(a) of the Private Licensed Schools Act (24 P.S. §6504(a)) requires the Board to establish standards, rules and regulations.

Section 10(a) of the Private Licensed Schools Act (24 P.S. §6510(a)) requires the Board to increase its fees by regulation so that the projected revenues will meet or exceed projected expenditures when the revenue raised by fees, fines and civil penalties imposed under this act are not sufficient to meet Board expenditures over a two-year period. The current fees are fixed by Pa. Code §73.151.

(11) Explain the compelling public interest that justifies the regulation. What is the problem it addresses?

The Private Licensed Schools Act empowered the Board to promulgate rules and regulations and to increase licensing fees to meet Board expenses. The Board's current fees are fixed by §73.151. The Board has recently reviewed its fees and determined that current fees are inadequate to meet revenue needs. Students enrolled in private licensed schools' training programs invest considerable time and money, adequate consumer protection and regulatory oversight is necessary.

(12) State the public health, safety, environmental or general welfare risks associated with nonregulation.

Nonregulation would adversely impact the fiscal integrity and oversight responsibility of the Board. Unscrupulous operators or entities would be more likely to take advantage of Pennsylvania citizens through unfair and deceptive acts and practices by unlicensed schools. Also, the Board would be unable to provide for the continuous regulatory oversight of private licensed and registered schools enrolling Pennsylvania students. The increase in fees is used to support Board and staff expenditures.

(13) Describe who will benefit from the regulation. (Quantify the benefits as completely as possible and approximate the number of people who will benefit.)

Pennsylvania students (approximately 345,149) are the primary beneficiaries of these regulations and approximately 345 licensed schools benefit from adequate funding of Board activities. The second beneficiaries are the employers who hire the graduates from private licensed schools. The resources these students provide are vital to a skilled workforce in a wide variety of industry or business, trade and technical jobs and creative career fields. There are approximately 350 private licensed/registered schools that provide the skilled workforce to Pennsylvania industry.

Regulatory Analysis Form

(14) Describe who will be adversely affected by the regulation. (Quantify the adverse effects as completely as possible and approximate the number of people who will be adversely affected.)

Licensees applying for biennial renewal of school license will be required to bear up-to-date cost of providing the services involved. Approximately 345 schools will pay their biennial licensing fee on a graduated scale (\$500 - \$4,400) based on gross tuition revenue collected. Also, approximately, 350 admission representative licenses will increase from \$150 to \$300 annually.

(15) List the persons, groups or entities that will be required to comply with the regulation. (Approximate the number of people who will be required to comply.)

Approximately 345 schools apply for licenses biennially and 350 admission representatives apply for licenses annually.

(16) Describe the communications with and input from the public in the development and drafting of the regulation. List the persons and/or groups who were involved, if applicable.

The Board's Executive and Financial Review Committees, consisting of two public and five private licensed school representatives, considered the licensing fees as required by the statute.

(17) Provide a specific estimate of the costs and/or savings to the regulated community associated with compliance, including any legal, accounting or consulting procedures, which may be required.

No legal, accounting or consulting cost are anticipated as a result of the regulation. The estimate of the costs to the regulated community associated with compliance is described in item number 14 above.

Regulatory Analysis Form

(18) Provide a specific estimate of the costs and/or savings to local governments associated with compliance, including any legal, accounting or consulting procedures which may be required.

There will be no cost or savings to local government associated with compliance.

(19) Provide a specific estimate of the costs and/or savings to state government associated with the implementation of the regulation, including any legal, accounting, or consulting procedures which may be required.

State government saves approximately \$600,000 per year. This is because the Board supports itself through the licensing fees and fines the regulated community pays to the State Board of Private Licensed Schools.

Regulatory Analysis Form

(20) In the table below, provide an estimate of the fiscal savings and costs associated with implementation and compliance for the regulated community, local government, and state government for the current year and five subsequent years.

	Current FY Year	FY +1 Year	FY +2 Year	FY +3 Year	FY +4 Year	FY +5 Year
SAVINGS:	N/A	N/A	N/A	N/A	N/A	N/A
Regulated						
Local Government						
State Government						
Total Savings						
COSTS:						
Regulated						
Local Government						
State Government	\$558,000	\$564,000	\$609,000	\$679,000	\$708,000	\$738,000
Total Costs						
REVENUE						
Regulated	N/A	N/A	N/A	N/A	N/A	N/A
Local Government						
State Government						
Total Revenue Losses						

(20a) Explain how the cost estimates listed above were derived.

Cost estimates for the regulated community are based on the total revenue received for the current fiscal year for 36 initial applications for school licensure (\$54,000), 191 renewals of school licensure (\$384,100), 107 new program approvals (\$37,450), 290 admission representative licenses (\$43,500), 55 new school orientations (\$5,500), 7 change of ownerships (4,200), 45 school site visits (\$11,250) and 4 miscellaneous charges imposed on the schools (\$615).

Regulatory Analysis Form

(20b) Provide the past three-year expenditure history for programs affected by the regulation.

Program	FY -3	FY -2	FY -1	Current FY
Private Licensed Schools	\$462,798	\$526,839	\$504,229	\$545,365

(21) Using the cost-benefit information provided above, explain how the benefits of the regulation outweigh the adverse effects and costs.

The Private Licensed School Act requires the Board to raise fees so that projected revenue will meet or exceed projected expenditures. This regulation enables the Board to satisfy that requirement. Consumer protection is a benefit for students. The Board makes certain that new schools and changes in existing schools meet minimum standards of quality and performance to protect students and consumers.

(22) Describe the nonregulatory alternatives considered and the costs associated with those alternatives. Provide the reasons for their dismissal.

An increase in licensing fees could not be achieved without regulatory change. No nonregulatory alternatives were considered since the Private Licensed Schools Act mandates that the Board increase its fees by regulation so that projected revenue will meet or exceed projected expenditures.

(23) Describe alternative regulatory schemes considered and the costs associated with those schemes. Provide the reasons for their dismissal.

No other regulatory approaches were considered.

Regulatory Analysis Form

(24) Are there any provisions that are more stringent than federal standards? If yes, identify the specific provisions and the compelling Pennsylvania interest that demands stronger regulation.

There are no applicable federal standards. This is an area solely governed by state law and these regulations were specifically drafted under the authority of the Private Licensed Schools Act.

(25) How does this regulation compare with those of other states? Will the regulation put Pennsylvania at a competitive disadvantage with other states?

Pennsylvania will not be placed at a disadvantage with other states. Comparison of this regulation with other states would be ineffective because these changes relate specifically to Pennsylvania statutes. Surrounding state (Ohio, New York, Delaware, Maryland West Virginia, Virginia, etc.) revenue is dependent upon funds received from the General Assembly state's appropriation or a combination of state appropriation and licensing fees charged to their regulated community.

(26) Will the regulation affect existing or proposed regulations of the promulgating agency or other state agencies? If yes, explain and provide specific citations.

No. The regulations will not affect existing or proposed regulations.

(27) Will any public hearings or informational meetings be scheduled? Please provide the dates, times, and locations, if available.

Pursuant to the Regulatory Review Act, any changes or amendments to the regulations will be submitted to the Independent Regulatory Review Commission and the House and Senate Education Committees for review. In addition, public comments will be solicited at the public meetings of the State Board of Private Licensed Schools at which the regulation is addressed and upon publication in the Pennsylvania Bulletin. Interested person are invited to submit to the State Board of Private Licensed Schools their written comments, suggestions or objections regarding this proposal.

Regulatory Analysis Form

(28) Will the regulation change existing reporting, record keeping, or other paperwork requirements? Describe the changes and attach copies of forms or reports which will be required as a result of implementation, if available.

No changes to reporting, record keeping or paperwork are required by the regulations.

(29) Please list any special provisions which have been developed to meet the particular needs of affected groups or persons including, but not limited to, minorities, elderly, small businesses, and farmers.

Regulated schools vary widely in size and revenue. This variation is taken into account through the graduated school renewal biennial fee schedule. Smaller schools or entities will benefit in paying lower biennial licensing fees when their gross tuition revenue falls under \$10,000.

(30) What is the anticipated effective date of the regulation; the date by which compliance with the regulation will be required; and the date by which any required permits, licenses or other approvals must be obtained?

It is recommended that the proposed regulation take effect by May 1, 2001, to affect school licenses and user fees that are due for renewal on July 1, 2001.

(31) Provide the schedule for continual review of the regulation.

The State Board of Private Licensed Schools is required by law to monitor its revenues and costs on a biennial basis and revise its regulations as necessary.

No sunset date has been assigned.

FACE SHEET
FOR FILING DOCUMENTS
WITH THE LEGISLATIVE REFERENCE BUREAU

(Pursuant to Commonwealth Documents Law)

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REVIEW COMMISSION



2183

DO NOT WRITE IN THIS SPACE

Copy below is hereby approved as to
form and legality. Attorney General

[Signature]
BY: _____
(DEPUTY ATTORNEY GENERAL)

APR 29 2001

DATE OF APPROVAL

☐ Check if applicable
Copy not approved. Objections
attached.

Copy below is hereby certified to be a true and correct copy
of a document issued, prescribed or promulgated by:

Department of Education
State Board of Private Licensed Schools

(AGENCY)

DOCUMENT/FISCAL NOTE NO. 006-272

DATE OF ADOPTION: _____

BY: *[Signature]*

Coordinating Secretary
TITLE: _____
(EXECUTIVE OFFICER, CHAIRMAN OR SECRETARY)

Copy below is hereby approved as
form and legality. Executive or Indepen
ent Agencies.

BY: *[Signature]*
3/15/01
DATE OF APPROVAL

(Deputy General Counsel)
(Chief Counsel, Independent Agency)
(Strike inapplicable title)

☐ Check if applicable. No Attorney Ge
eral approval or objection within 3
days after submission.

Proposed Rulemaking

Department of Education
State Board of Private Licensed Schools

Title 22 - Education
Chapter 73
General Provisions

NOTICE OF PROPOSED RULEMAKING

PREAMBLE

DEPARTMENT OF EDUCATION

STATE BOARD OF PRIVATE LICENSED SCHOOLS

[22 PA. CODE CH. 73]

The State Board of Private Licensed Schools (Board), under the authority granted by the Private Licensed Schools Act (24 P.S. §§6501-6518), proposes to amend §73.1 (relating to definitions) and §73.151 (relating to fees) as set forth in Annex A.

Description of Proposed Amendments

The proposed amendment of §73.1 adds a new definition for “Seminars,” and revises the definition of “Nonresident.”

The proposed amendment of §73.151(a) prescribes a new fee for initial licensure of schools that only present seminars, and revises fees for biennial licensure or registration of all schools, and licensure of admissions representatives.

The proposed amendment of §73.151(b) increases the User Fees for other services provided by the Board, which services are in addition to the processing and issuance of original or renewal school licenses, registration and admissions representative licenses.

Reason for Proposed Amendments

The Board's current fees are fixed by §73.151. Section 10 of the Private Licensed Schools Act (24 P.S. §6510) authorizes the Board to increase its fees by regulation if the Board's revenues from fees, fines and civil penalties are not sufficient to meet Board expenditures over a two-year period.

The Board recently reviewed its fees and determined that current fees are inadequate to meet anticipated revenue needs. The Board estimates that its expenditures for the biennial period covering Fiscal Years 2000-01 and 2001-02 will be \$1,172,033. In contrast, the estimated revenues under the existing fee structure are \$1,044,500.

The proposed fees at §73.151 should raise sufficient revenue to offset the Board's projected expenditures for Fiscal Years 2000-01 and 2001-02 while maintaining a surplus, projected to be about \$259,080 by June 30, 2002, as a cushion against unanticipated expenditures or additional revenue shortfalls.

The Board last increased its fees on July 1, 1991. At that time, the Board's projections assumed substantial growth in the number of original and renewal licenses, registrations and program applications submitted. The numbers of license, registration, admission representatives and new program applications have decreased since that time and the Board has operated at a deficit in five of the nine preceding fiscal years under the current fee structure. Although the Board has covered previous deficits by drawing on the year-to-year carryover of unused funds, the carryover will be depleted in FY 2001-02, resulting in a negative balance in the Board's budget. At the same time, estimated expenditures will exceed revenue projections. The current staffing level will need to be maintained for the foreseeable future.

In regard to the inclusion of seminars, an unlicensed school, business or entity that meets the definition of a seminar will be required to submit an original application for licensure or registration and will pay the \$750 initial application fee. Licensure will discourage such a business or entity from bait and switch advertising or solicitation under the term "seminar." It also will provide protection for the consumer in the areas of advertisements and representation, curriculum standards and qualified instructional staff. The reduced original application fee will benefit smaller schools and businesses presenting only seminars. It will not create an onerous burden for schools seeking initial licensure to offer short-term training courses. This type of school will not be required to submit a lengthy application for initial licensure and will be permitted to offer courses in various locations across the state under the revised definition of "Nonresident" as set

forth in Annex A. After one year of operation, biennial renewal fees are on an assessed graduated scale based upon gross tuition revenue. The lower end of the graduated scale will benefit smaller schools where their gross tuition revenue collected is less in comparison to already established private licensed schools.

The new and revised proposed fees are set forth in Annex A. The proposed fees will meet the anticipated need for additional revenue.

Fiscal Impact

There is no fiscal impact from the proposed new or modified definitions. If the existing fee structure is not revised, total revenue, combined with current carry-over for the 1999-00 fiscal year, is expected to be \$1,086,293 for the biennial period ending 2001-02. The proposed increased fees, together with fees which will not be increased, and the amount carried over from the 1999-00 fiscal year are expected to generate revenues totaling \$1,389,320 for the Board for the period ending 2001-02. Following is a table showing how much of the Board's total revenue each fee is expected to generate:

	Estimated Number of Fee Payers	
	Biennially Times	Amount of Fee
	<u>FY 2000-01</u>	<u>FY 2001-02</u>
<u>Board Activity</u>		<u>Est. Revenue</u>
1. Original School License	40x\$1,500a	\$60,000

or Registration		40x\$1,500b	\$60,000
2. Biennial School Licensure			
or Registration	\$0	6x\$1,200a	\$7,200
		9x\$1,200b	\$10,800
	\$150-9,999	8x\$1,400a	\$11,200
		10x\$1,400b	\$14,000
	\$10,000-49,999	24x\$1,500a	\$36,000
		20x\$2,200b	\$44,000
	\$50,000-99,999	25x\$1,600a	\$40,000
		26x\$2,300b	\$59,800
	\$100,000-199,999	28x\$1,800a	\$90,720
		18x\$2,600b	\$46,800
	\$200,000-499,999	25x\$2,100a	\$52,500
		24x\$3,000b	\$72,000
	\$500,000-999,999	17x\$2,400a	\$40,800
		24x\$3,500b	\$84,000
	\$1,000,000-1,999,999	18x\$2,800a	\$81,200
		29x\$4,100b	\$118,900
	\$2,000,000 and over	12x\$3,000a	\$36,000
		21x\$4,400b	\$92,400
3. Admission Representative License			
		240x\$150a	\$36,000

		240x\$300b	\$72,000
4. New Program Application	150x\$350a		\$52,500
		150x\$700b	\$105,000
5. Change of Ownership	10x\$600a		\$6,000
		10x\$1,200b	\$12,000
6. New School Orientation Seminar	50x\$100a		\$5,000
		50x\$200b	\$10,000
7. School Site Inspection	40x\$250a		\$10,000
		40x\$500b	\$20,000.

a - For fees collected 7/01/00 – 6/30/01.

b - For fee collected under proposed fee increase 7/01/01 – 6/30/02.

8. Estimated Revenue from New Fees	\$824,200
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9. Estimated Revenue from Fees not Increase	\$565,120
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Total Estimated Revenue	\$1,389,320
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Total Estimate Expenditure	\$1,172,033
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Rollover Amount from FY 1999-00	\$ 41,793
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Surplus for Unanticipated Expenditures	\$ 259,080
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or Revenue Shortfall

Paperwork Requirements

The proposed amendments require the Board to alter some of its forms to reflect the new fees. The proposed amendments will create no additional paperwork for the private sector.

Effective Date

These proposed amendments take effect upon final publication in the Pennsylvania Bulletin.

Sunset Date

The Private Licensed Schools Act requires that the Board monitor its revenues and costs on a biennial basis, and revise its regulations as necessary. Therefore, no sunset date has been assigned.

Regulatory Review

Under section 5(a) of the Regulatory Review Act (71 P.S. § 745.5(a)), the Department of Education submitted a copy of these proposed amendments on

_____ to the Independent Regulatory Review Commission (IRRC) and to the Chairpersons of the House and Senate Committees on Education. In addition to submitting the proposed amendments, the Department has provided IRRC and the Committees with a copy of a detailed Regulatory Analysis Form prepared by the Department in compliance with Executive Order 1996-1 "Regulatory Review and Promulgation." A copy of this material is available to the public upon request.

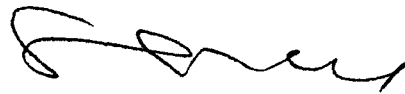
If the Committees have any objections to any portion of the proposed amendments, they will notify the Department of Education within 20 days of the close of the public comment period. Under section 5(g) of the Regulatory Review Act, if IRRC has any objections to any of the proposed amendment, it will notify the Department within 10 days of the close of the Committees' comment period. The notification shall specify the regulatory review criteria that have not been met by that portion. The Regulatory Review Act specifies detailed procedures for review of objections raised, prior to final publication of the regulations, by the Board, the General Assembly and the Governor.

Public Comments and Contact Person

Interested persons are invited to submit to the State Board of Private Licensed Schools their written comments, suggestions or objections regarding these proposed amendments within 30 days following publication in the Pennsylvania Bulletin. Written

comments, suggestions or objections for Board consideration should be sent to Ms. Sharon Lane, Acting Coordinating Secretary, State Board of Private Licensed Schools, 333 Market Street, Harrisburg, Pa. 17126-0333, and (717) 783-8228.

By the State Board of Private Licensed Schools

A handwritten signature in black ink, appearing to read 'Sharon Lane', with a stylized, cursive script.

Sharon Lane

Acting Coordinating Secretary

ANNEX A

Title 22. EDUCATION

PART 111. STATE BOARD OF PRIVATE LICENSED SCHOOLS

CHAPTER 73. GENERAL PROVISIONS

DEFINITIONS

§ 73.1. Definitions.

The following words and terms, when used in this chapter, have the following meaning, unless the context clearly indicate otherwise:

* * * * *

Nonresident - A student who is [off the premises of a school facility] receiving instruction by correspondence, telecommunication or similar means including seminar.

* * * * *

Seminar – Training or instruction that is one of the following:

(i) Noncumulative short-term training of no more than 15 hours duration, not scheduled in a regular calendar format and offered as an introduction or orientation to an occupation; or

(ii) Instruction for an entry-level occupation offered at a total contract price, of less than \$300, which includes all costs charged to students, including, but not limited to, tuition, fees, books, and supplies, provided that

the total contract price for all courses to any enrolled student is less than \$300 in any one calendar year.

* * * * *

§ 73.151. Fees.

- (a) License fees. The fees for school and admissions representative licenses shall accompany both original and renewal license and registration applications.

The fee schedule is:

- (1) For an original school license or registration --\$1,500 [annually].
- (2) For an original school license or registration of a school that only presents seminars -- \$750.
- (3) For a renewal school license or registration --biennial fee based on gross tuition revenue:

Gross Tuition Revenue	Fee
<u>\$0-2,499</u>	\$[1,200] <u>500</u>
\$[150-9,999]	\$[1,400]
<u>\$2,500-4,999</u>	<u>\$1,000</u>

<u>\$5,000-9,999</u>	<u>\$2,000</u>
\$10,000-49,999	\$[1,500] <u>2,200</u>
\$50,000-99,999	\$[1,600] <u>2,300</u>
\$100,000-199,999	\$[1,800] <u>2,600</u>
\$200,000-499,999	\$[2,100] <u>3,000</u>
\$500,000-999,999	\$[2,400] <u>3,500</u>
\$1,000,000-1,999,999	\$[2,800] <u>4,100</u>
\$2,000,000 and over	\$[3,000] <u>4,400</u>

(4) For an admission representative license -- \$[150] 300 annually.

(b) User fees. Fees will also be assessed for other services provided by the Board, which services are in addition to the processing and issuance of original or renewal school licenses or registration and admissions representative licenses.

These user fees are as follows:

- (1) A \$[350] 700 fee shall accompany each application for approval of a new program.
- (2) A \$[600] 1,200 fee shall accompany notification to the Board of a change in ownership of the school.
- (3) A \$[100] 200 fee per participant will be charged for participation in new school orientation seminars.
- (4) A \$[250] 500 fee will be charged for each site inspection of the following types: new school, change in location, expansion of

instructional space, temporary relocation, branch facility and remote training facility. This fee shall be paid before commencement of the visit.

(5) The fee for a Board-directed visit is \$[250] 500 per day if the visit is conducted by staff; \$[400] 800 per day plus team member expenses for a visit conducted by a team with non-staff members. The fee for a Board-directed visit shall be paid before commencement of the visit.

* * * * *



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF EDUCATION
333 MARKET STREET
HARRISBURG, PENNSYLVANIA 17126-0333

SECRETARY OF EDUCATION

717 787 5820 (TEL)
717-787-7222 (FAX)
717-783 8445 (TTY)

April 4, 2001

Mr. Robert E. Nyce
Executive Director
Independent Regulatory Review Commission
14th Floor
333 Market Street
Harrisburg, PA 17126

Dear Mr. Nyce:

Enclosed are copies of proposed regulations for review by your Commission pursuant to the Regulatory Review Act. The proposed regulations, Chapter 73, relate to general provisions of the State Board of Private Licensed Schools.

The Regulatory Review Act provides that the Commission must, within 10 days from the closing date of the Committees' review period, submit comments to the Department regarding the regulations. We anticipate that the regulations will be published in the Pennsylvania Bulletin on April 14, 2001.

The Department of Education will provide your Commission with any assistance you may require to facilitate a thorough review of these proposed regulations.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Charles B. Zogby", with a long horizontal line extending to the right.

Charles B. Zogby
Acting Secretary

cc: Gregory Dunlap, Esq.
Linda Barrett, Esq.

**TRANSMITTAL SHEET FOR REGULATIONS SUBJECT TO THE
REGULATORY REVIEW ACT**

I.D. NUMBER: 6-272
SUBJECT: General Provisions
AGENCY: DEPARTMENT OF EDUCATION

TYPE OF REGULATION

- X Proposed Regulation
Final Regulation
Final Regulation with Notice of Proposed Rulemaking Omitted
120-day Emergency Certification of the Attorney General
120-day Emergency Certification of the Governor
Delivery of Tolled Regulation
a. With Revisions b. Without Revisions

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REVIEW COMMISSION
1

FILING OF REGULATION

DATE	SIGNATURE	DESIGNATION
7/4/01	<i>Elaine Romano</i>	HOUSE COMMITTEE ON EDUCATION
04-07-01	<i>Coranne Brandt</i>	
4/4	<i>Joan Genger</i>	SENATE COMMITTEE ON EDUCATION
4/4	<i>D. Hook</i>	
4/4	<i>Steph F. Hoffman</i>	INDEPENDENT REGULATORY REVIEW COMMISSION
		ATTORNEY GENERAL
	<i>William J. Hannon 4/4/01</i>	LEGISLATIVE REFERENCE BUREAU

April 2, 2001