

Regulatory Analysis Form

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INDUSTRY REGULATORY
REVIEW COMMISSION

(1) Agency

Department of Education

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

006-286

IRRC Number: 2343

(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: Patricia A. Landis
(717) 783-8228

(6) Type of Rulemaking (check one)

Proposed Rulemaking

Final Order Adopting Regulation ☒ X

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 governs the operation of private licensed schools, including the licensing and enforcement procedures of the Board of Private Licensed Schools. Several amendments are proposed to clarify certain provisions. The main substantive changes are contraction of the definition of student record, a new requirement for annual consolidation of student records, requiring attendance at new school seminars and limiting new school applicants to one program approval for their new school application fee.

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

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

(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 for licensing and administrative procedures. These amendments will help to license and monitor schools.

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

Nonregulation would adversely impact the 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.

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

Approximately 345,150 Pennsylvania students and approximately 350 private licensed schools are the primary beneficiaries of these regulations. Secondary beneficiaries are the employers who hire private licensed school graduates. The resources these students provide are vital to a skilled workforce in a wide variety of skilled trades, business, and industrial positions in the Commonwealth.

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.)

The regulation will have no adverse effect.

(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.)

New applicants for licensure and approximately 350 existing private licensed schools will be required to comply with these regulations.

(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 Committee and Regulations and Policy Review Committee consisting of two (2) public representatives and five (5) school owners discussed and developed these proposed regulatory changes. The Board has voted its intention to adopt these regulations. The proposed language has been distributed to all existing private licensed schools for comment.

(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.

Those schools which do not already do so will incur costs for the annual consolidation of student records. These costs are estimated to be approximately \$1 per student who graduates, withdraws, or terminates. Any potential school applicant will be required to attend a new school seminar, the cost of which will be \$200.00. The annual cost of this new requirement will be approximately \$10,000, based on an average of 50 new applicants per year. Finally, it will cost new schools approximately \$700 for any programs over one submitted along with the initial license application.

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.

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

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 N 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	235,080	235,080	235,080	235,080	235,080	235,080
Local Government						
State Government						
Total Costs						
REVENUE						
Regulated						
Local Government						
State Government	\$54,100	\$54,100	\$54,100	\$54,100	\$54,100	\$54,100
Total Revenue Losses						

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

Costs of consolidation of student transcripts is estimated at \$1 per student for copying, materials, storage, and staff time. Total enrollment for 00/01 was 361,961. Programs average 2 years in length, resulting in the graduation, termination, or withdrawal of an average of 180,980 students per year.

The Division of Private Licensed Schools receives approximately 50 inquiries per year that result in a serious attempt to complete an application for licensure. Each of these applicants would be required to attend an orientation seminar at the cost of \$200 for a total expenditure of \$10,000. This would be revenue to the State.

The Board of Private Licensed Schools receives an average of 63 program applications with original licensure applications in addition to the one program that would be included in the license fee. Costs of paying the proposed \$700 fee per program would be \$44,100. This would be revenue to the State.

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

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

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

No non-regulatory alternatives were considered since the proposed changes to the regulation address problems that have arisen in the implementation of the existing regulatory language, which problems require regulatory solution.

(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 and regulations.

(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, all changes or amendments to the regulations have been submitted to the Independent Regulatory Review Commission and the House and Senate Education Committees for review. In addition, public comments were 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 persons were 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.

Yes, the changes to section 73.21 through 73.25 will change what is included in a person's "student record" and lessen the record keeping burden upon schools, while at the same time, requiring schools to consolidate records on an annual basis.

(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.

The regulation change does not require special provisions to meet the particular needs of affected groups.

(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 September 1, 2004.

(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.

Regulatory Analysis Form

CDL-1

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LEGISLATIVE
REVIEW COMMISSION

FACE SHEET
FOR FILING ~~OF~~ DOCUMENTS
WITH THE LEGISLATIVE REFERENCE BUREAU

(Pursuant to Commonwealth Documents Law)

DO NOT WRITE IN THIS SPACE

#2343

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

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

Copy below is hereby approved as to
form and legality. Executive or
Independent Agencies

State Board of Private Licensed Schools
(AGENCY)

By: _____
(Deputy Attorney General)

DOCUMENT/FISCAL NOTE NO. 006-286

DATE OF ADOPTION October 19, 2000

10.20.04

DATE OF APPROVAL

DATE OF APPROVAL

☐ Check if applicable

Copy not approved. Objections
attached.

BY Patricia A. Landis

TITLE Secretary, State Board of
Private Licensed Schools

EKEC (Deputy General Counsel)
(Chief Counsel - Independent Agency)
(Strike inapplicable title)

☐ Check if applicable. No Attorney
General Approval or objection within
30 days after submission.

NOTICE OF RULEMAKING

TITLE 22, EDUCATION

STATE BOARD OF PRIVATE LICENSED SCHOOLS
(22 Pa. Code Ch. 73)

Promulgated in accordance with
the Private Licensed Schools Act
(24 P.S. Section 6504)

Title 22 – Private Licensed Schools General Provisions

[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), amends Title 22 of the Pennsylvania Code, Chapter 73, General Provisions, to read as set forth in Annex A.

A. Effective Date

The final-form rulemaking is effective upon publication in the *Pennsylvania Bulletin*.

B. Contact Person

For further information, contact Patricia Landis, Chief, Private Licensed Schools Division, Department of Education, 333 Market Street, Harrisburg, PA 17126, (717) 783-8228, TTY#: (717) 783-8445.

C. Background and Need for the Final-Form Rulemaking

The regulations govern the operation of private licensed schools, including the licensing and enforcement procedures of the Board of Private Licensed Schools. Several amendments are proposed to clarify certain provisions. The main substantive changes are contraction of the definition of student record, a new requirement for annual consolidation of student records, a new requirement for attendance at new school seminars and the limitation of new school applicants to one program approval for their new school application fee. These amendments will assist the Board in licensing and monitoring schools and will aid the Board in providing for the

continuous regulatory supervision of private licensed and registered schools that enroll Pennsylvania students.

D. Statutory Authority

Section 174 of the Act of December 15, 1986 (P.L. 1585, No. 174) (Act 174) (24 P.S. § 6504) authorizes the Board to promulgate regulations regarding the approval or disapproval of initial and renewal licensure and/or registry of schools; the suspension or revocation of the licensure and/or registry of schools; the approval or disapproval of the licensing of in-State and out-of-State admissions representatives; and the establishment of qualifications for instructors, administrators, and supervisors.

E. Description of Amendments

Section 73.1 has been amended to add a new definition for “Quarter credit hour” and remove the term “entry level” from the definition of seminars.

Sections 73.21 - 73.23 have been amended specify the content of student records and eliminate the distinction between long-term and short-term retention of records. The amendments also require the annual consolidation of student records and relieve the schools of the requirement to maintain the enrollment agreement, financial records, and financial aid documentation for five years following graduation, withdrawal, or termination.

Section 73.25 has been amended to prescribe the content of the disposition of records agreement. The amendment includes a reference to the contents of the student records defined in §73.21 to improve clarity.

Section 73.51 (b) has been amended to require applicants for licensure to attend a new school orientation. Section 73.51(d) has been amended to remove the requirement that the Board provide a signed receipt for all materials.

Section 73.52 has been amended to authorize the Board to refuse to issue a license if the name of the proposed school or program is misleading.

Section 73.54 has been amended to mandate that surety be maintained throughout the period of licensure.

Section 73.71 has been amended to clarify the licensure requirement for admissions representatives.

Section 73.81 has been amended to include the appropriate reference to credit hours and quarter credits and authorize the Board to refuse to approve a program if the name of the proposed program is misleading.

Section 73.104 has been amended to eliminate the maintenance of attendance records from the responsibilities of instructors.

Section 73.136 has been amended to include a student's failure to return from a leave of absence under the conditions for which a refund must be made within 30 days.

Section 73.141 regarding issuance has been amended to include authorization for the Board to refuse to issue a license if the name of the school is misleading.

Section 73.151 has been amended to specify that only one program approval is included under the \$1500 initial license application fee paid by a new school. Applicants with multiple programs will henceforth be required to pay a \$700 program application fee for each additional program to be offered.

Section 73.173 has been amended to include the general public under sectors that may not be misled by advertisements or representations on behalf of a licensed school. The amendment broadens the prohibition against misleading advertising and representations to include the general public instead of prospective students only.

F. Summary of Comments and Responses on the Proposed Rulemaking and Changes in the Final-Form Rulemaking

§ 73.22a. (relating to the consolidation and storage of student records)

The Pennsylvania Association of Private School Administrators noted that these sections required clarification regarding the consolidation and electronic storage of student records. Thus, the Board added section 73.22a, which requires schools to consolidate copies of transcripts on an annual basis and store them in either a hard-copy file format or as a printable electronic record.

§ 73.51(b) (relating to the orientation seminar requirement)

IRRC suggested that the Board should add language that states how often orientation seminars are held and the location of such seminars. The Board agrees, and the final-form rulemaking has been revised to state that orientation seminars will be conducted monthly at the Department of Education.

§ 73.54 (relating to surety)

IRRC suggested that the proposed language in Subsection (b)(5) was unrelated to the other provisions under (b), and therefore should be a separate item. The IRRC recommended that it be moved to Item (c) and that all of the subsequent sections be renamed. The Board

agrees that it should be included in a separate section, however the Board chose to put it under Item (f) rather than Item (c). This placement did not substantively affect IRRC's suggestion.

§ 73.151 (relating to fees)

IRRC recommended that the Board more clearly delineate the "\$1,500 annually" language to make it consistent with Subsection (a)(3). The board agrees and has amended the section to clarify that the fee for an original school license or registration includes the user fee for the application for approval of one new program, and that each additional new program application submitted with a license application must be accompanied by an additional program approval fee .

G. Fiscal Impact

The amendments create minimal fiscal impact. The revenues generated by the orientation seminar and additional program application fees are estimated at \$44,100 per year and will cover staff and Board costs for the review of these applications, which is not currently recovered. The costs of complying with the changes to the requirements for records compilation and storage are estimated at \$1 per student for copying, materials, storage, and staff time. This cost will be assumed by the school and recovered through student fees and tuition. This activity will not generate any revenue for the State.

H. Paperwork Requirement

The changes to §73.21 - §73.23 will relieve the regulated community of paperwork requirements regarding the maintenance of student records. The change to §73.51 relieves the Board of the paperwork requirement of providing a signed receipt for all application materials

received. The amendment of §73.104 will relieve the schools of the additional paperwork to maintain student attendance records. No additional forms or reporting are required by the regulated schools or the State.

I. 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.

J. Regulatory Review

Under section 5(a) of the Regulatory Review Act (71 P.S. §745.5(a)), on June 21, 2004, 2004, the Board submitted a copy of this proposed rulemaking, published at 33 Pa.B. 2885, and a copy of a Regulatory Analysis Form to the Independent Regulatory Review Commission (IRRC) and to the Chairpersons of the House and Senate Committees on Education for review and comment.

Under section 5(c) of the Regulatory Review Act, IRRC and the House and Senate Committees were provided with copies of the comments received during the public comment period, as well as other documents when requested. In preparing the final-form rulemaking, the Board has considered all comments from IRRC, the House and Senate Committees, and the public.

Under section 5.1(j.2) of the Regulatory Review Act (71 P.S. § 745.5a(j.2)), on _____, the final-form rulemaking was deemed approved by the House and Senate Committees. Under

section 5.1(e) of the Regulatory Review Act, IRRC met on _____ and approved the final-form rulemaking.

K. Proposed Findings

The Board finds that:

(1) Public notice of the proposed rulemaking was given under sections 201 and 202 of the act of July 31, 1968 (P.L. 769, No. 240) (45 P.S. §§ 1201 and 1202) and the regulations promulgated thereunder, 1 Pa. Code §§ 7.1 and 7.2.

(2) A public comment period was provided as required by law and all comments were considered.

(3) This final-form rulemaking does not enlarge the purpose of proposed rulemaking published at 31 Pa.B. 5713.

(4) This final-form rulemaking is necessary and appropriate for administering and enforcing the authorizing act identified in Part C of this preamble.

L. Order

The Board, acting under its authorizing statutes, orders that:

(a) The regulations of the Board, 22 Pa. Code Chapter 73, are amended by amending §§ 73.1, 73.21 - 73.23 , 73.25, 73.51, 73.52, 73.54, 73.71, 53.81, 73.104, 73.136, 73.141, 73.151, and 73.173 to read as set forth in Annex A.

(b) The Board shall submit this order and Annex A to the Office of General Counsel and to the Office of Attorney General as required by law.

(c) The Board shall certify this order and Annex A and deposit them with the Legislative Reference Bureau as required by law.

(d) This order shall take effect on publication in the *Pennsylvania Bulletin*.

Patricia A. Landis

PATRICIA A. LANDIS,

*Secretary, State Board of
Private Licensed Schools*

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 indicates otherwise:

* * *

Quarter credit hour—A unit of curricular material which normally can be taught in a minimum of 10 clock hours of lecture. For laboratory and shop instruction, a quarter credit hour represents a minimum of 20 clock hours. For externship/internship experiences, a quarter credit hour represents a minimum of 30 clock hours.

* * *

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

(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 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.

* * *

STUDENT RECORDS

§73.21. Contents of student records.

Student records shall contain a transcript of academic performance, which shall include, but not be limited to, student name, identifying number, program or course attended, grades for all subjects taken, date of entrance, date of graduation or withdrawal

and the award received upon completion[; enrollment agreement; student financial account record; and the financial aid documentation required by State and Federal agencies].

§ 73.22. [Short-term retention of student records] Reserved.

[A school shall provide for a method of maintenance of and access to the student records defined in §73.21 (relating to contents of student records) for a period of 5 years after graduation, termination or withdrawal of the student.]

§73.22a. Annual consolidation of student transcripts.

Annually, a school must consolidate copies of all transcripts of academic performance for all students who have graduated, terminated or withdrawn during the previous calendar year. These transcripts of academic performance, for each year, must be stored separately in a hard copy file or printable electronic record.

§73.23. [Long-term r] Retention of transcript of academic performance.

[After the 5-year retention period,] A school shall provide for a method of maintenance of and access to the transcript of academic performance for a period of 50 years after graduation, termination or withdrawal.

* * *

§73.25. Content of disposition statement.

- (a) The statement shall include the name and address of the depository, agreement of the depository and terms of the agreement.
- (b) Proper disposition of student records shall be subject to approval of the Board and shall include a means of access by the student for copies of records [that relate to that student's enrollment] as defined in section 73.21.

APPLICATION FOR SCHOOL LICENSE OR REGISTRATION

§73.51. General Requirements.

* * *

- (b) A person, partnership or corporation desiring to operate a private licensed school in this Commonwealth shall attend a new school orientation seminar conducted by Board staff in Harrisburg and shall file an application for licensure or registration with the Board in the manner prescribed by the Board. Orientation seminars will be conducted monthly at the Department.

* * *

- (d) Original letters, proof of surety, forms and applications sent to the Board shall become the property of the Board, shall constitute records of the Board and may be retained by the Board. [Letters, applications, forms or other papers will not be considered received by the Board without signed verification of receipt from the Board.]

* * *

§73.52. Contents of application.

An application for an original license or registration shall contain, at a minimum, the following prepared in a manner and form prescribed by the Board:

* * *

- (2) The name of the school, ownership or governing body and officials. A copy of a fictitious name registration, articles of incorporation or charter. School names which the applicant wishes to appear on the license or registration shall be submitted, along with a fictitious name registration for each name. The Board may refuse to issue a license, when, in the Board's judgment, a name chosen by the applicant appears to be misleading to the public regarding the nature or scope of the school.

* * *

- (6) Descriptions of proposed courses or programs of instruction prepared under §§73.81-73.83 (relating to approval of programs). The Board may refuse to approve a program, when, in the Board's judgment, the name of the program chosen by the applicant appears to be misleading to the public regarding the nature or scope of the program.

§ 73.54. Surety.

* * *

- (b) *Levels of surety.* Regardless of the form of surety selected by the school, surety shall be demonstrated to exist at the following levels:

* * *

- (f) Schools are required to maintain surety at the levels under (b) of this section throughout the period of licensure.

* * *

ADMISSIONS REPRESENTATIVES

§73.71. License required.

[As defined in the act, n] No person may solicit or procure through an enrollment agreement off the premises of the school, a prospective student within this Commonwealth to enroll in a licensed or registered school unless the person has been licensed as an admissions representative [by the Board] of the school.

APPROVAL OF PROGRAMS

§73.81. Application requirements.

A school seeking original licensure or registration shall submit programs to the Board for approval in the manner and form established by the Board. This section applies to licensed or registered schools wishing to offer new programs.

* * *

- (1) Minimum requirements for program approval include the following:

* * *

- (ii) Each program - curriculum - shall be outlined in detail showing the courses, major subjects, hours/lessons (in clock hours, credit hours, or quarter credit hours) devoted to each subject and the award at completion of program. The school shall provide a list of instructional equipment.

* * *

- (2) Programs shall be approved by the Board before they can be advertised or offered.

* * *

- (iv) If the name that is proposed for the program may be misleading in regard to the program's nature and scope, the Board may refuse to approve the program

ADMINISTRATORS, SUPERVISORS AND INSTRUCTORS

§73.104. Instructor.

- (a) *Duties.* The primary duties of an instructor involve teaching, advising students and maintaining accurate [attendance and] academic records.

* * *

TUITION AND FEES

§73.136. Period of refund.

Refunds shall be made within 30-calender days of the date of the student fails to enter [or], leaves the program, or fails to return from a leave of absence.

ISSUANCE AND RENEWAL OF SCHOOL LICENSE OR REGISTRATION

§73.141. Issuance.

The department will issue an original school license or registration to a school approved by the Board as meeting the requirements of the act and this chapter. The Board may refuse to issue a license when the Board determines that the applicant's school name appears to be misleading to the public concerning the nature or scope of the school.

FEES

§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 . The fee for an original school license or registration includes the user fee for the application for approval of one (1) new program. Each additional new program application submitted with a new license application shall be accompanied by an additional new program approval fee as set forth in §73.151(b)(1) (relating to user fees).

* * *

§73.173. Advertisements and representations.

- (a) The advertising and representations made by a person representing the school may neither misrepresent facts relating to the school nor mislead prospective students or the general public.



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

OFFICE OF CHIEF COUNSEL

717-787-5500
FAX: 717-783-0347
TDD: 717-783-8445

October 22, 2004

VIA HAND-DELIVERY

Independent Regulatory Review Commission
14th Floor, Harristown 2
333 Market Street
Harrisburg, PA 17101

**Re: Filing of Regulation for Final Approval
Department of Education
State Board of Private Licensed Schools
Final Regulation #6-286**

Dear Sir or Madam:

On behalf of the Department of Education and the State Board of Private Licensed Schools, I write to obtain your review and approval of the above-referenced final regulation for publication as an amendment to 22 Pa. Code Chapter 73. I am enclosing a copy of the Face Sheet, Preamble, Annex A and Regulatory Analysis Form.

Thank you for your consideration of this final regulation. Please do not hesitate to contact me if you have any questions.

Very truly yours,

Amy C. Foerster
Assistant Counsel

Enclosures

cc: Patricia Landis, Chief, Division of Private Licensed Schools

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

I.D. NUMBER: #6 - 286

SUBJECT: State Board of Private Licensed Schools - General Provisions

AGENCY: DEPARTMENT OF EDUCATION

2343

TYPE OF REGULATION

Proposed Regulation

X 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

FILING OF REGULATION

DATE

SIGNATURE

DESIGNATION

10/22/04 *[Signature]*

HOUSE COMMITTEE ON EDUCATION

10/22/04 *[Signature]*

[Signature] 10/22/04
D.H. 10/22

SENATE COMMITTEE ON EDUCATION

10/23/04 *[Signature]*

INDEPENDENT REGULATORY REVIEW COMMISSION

ATTORNEY GENERAL (for Final Omitted only)

LEGISLATIVE REFERENCE BUREAU (for Proposed only)

October 20, 2004