

Regulatory Analysis Form

This space for use by IRRC

RECEIVED

2003 JUN 10 PM 2: 23

(1) Agency

Department of Education

INDEPENDENT REGULATORY
REVIEW COMMISSION

(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

Secondary Contact: Sharon Lane
(717) 783-8228

(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 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.

(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 will be 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 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.

(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 persons 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.

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 January 1, 2003.

(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

FACE SHEET
FOR FILING DOCUMENTS
WITH THE LEGISLATIVE REFERENCE BUREAU
(Pursuant to Commonwealth Documents Law)

RECEIVED

2003 JUN 10 PM 2:23

REGULATORY
REVIEW COMMISSION

2343

DO NOT WRITE IN THIS SPACE

<p>Copy below is hereby approved as to form and legality. <i>[Signature]</i></p> <p>BY: _____ (DEPUTY ATTORNEY GENERAL)</p> <p style="text-align: center;">MAY 28 2003 DATE OF APPROVAL</p> <p><input type="checkbox"/> Check if applicable Copy not approved. Objections attached.</p>	<p>Copy below is hereby certified to be a true and correct copy of a document issued, prescribed or promulgated by:</p> <p style="text-align: center;">Department of Education State Board of Private Licensed Schools (AGENCY)</p> <p>DOCUMENT/FISCAL NOTE NO. <u>006-286</u></p> <p>DATE OF ADOPTION: <u>February 17, 2000</u></p> <p>BY: <i>[Signature]</i> TITLE: <u>Coordinating Secretary</u> (EXECUTIVE OFFICER, CHAIRMAN OR SECRETARY)</p>	<p>Copy below is hereby approved as to form and legality. Executive or Independent Agencies. <i>[Signature]</i></p> <p style="text-align: center;">4/14/03 DATE OF APPROVAL</p> <p style="text-align: center;">(Deputy General Counsel) (Chief Counsel, Independent Agency) (Strike inapplicable title)</p> <p><input type="checkbox"/> Check if applicable. No Attorney General approval or objection within days after submission.</p>
--	--	---

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 Title 22 of the Pennsylvania Code, Chapter 73, General Provisions, as set forth in Annex A.

Description of Proposed Amendments and Reasoning

The proposed amendments of §73.1 add a new definition for "Quarter credit hour" and remove the term "entry level" from the definition of seminars. The addition of a definition for "Quarter credit hour" is consistent with the program requirements set forth in §73.81(1)(ii). The elimination of "entry level" from the definition of seminar reflects the Board's intention to include non-entry level training in this definition.

The proposed amendments of §73.21 - §73.23 specify the content of student records and eliminate the distinction between long-term and short-term retention of records. They also require the annual consolidation of student records. The proposed amendments 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 and eliminates

the distinction between long-term and short-term retention of records. These amendments are designed to ease record keeping requirements and facilitate record storage and transfer. The requirement of annual consolidation of student records is designed to organize and facilitate the storage of records.

The proposed amendment of §73.25 prescribes the content of the disposition of records agreement. The proposed amendment includes a reference to the contents of the student records defined in §73.21 to improve clarity.

The proposed amendment of §73.51 (b) requires applicants for licensure to attend a new school orientation. The application process can be cumbersome for uninitiated applicants. Applicants who choose not to attend the optional orientation seminars often encounter obstacles and delays that could have been avoided. These delays and the staff time required to resolve issues increases the cost of processing these applications. As a public service to applicants and in the interest of resource management, the Board is proposing to make the orientation seminars mandatory.

The proposed amendment of §73.51(d) removes the requirement that the Board provide a signed receipt for all materials. This change reflects practice in which verification of receipt can be made by staff members, by phone, and by e-mail.

The proposed amendment of §73.52 authorizes the Board to refuse to issue a license if the name of the proposed school or program is misleading. A few schools have proposed names

that do not represent the content of the instruction offered or are designed to associate the school with another institution or organization. This change would enable the Board to protect the public from potential misrepresentation.

The proposed amendment of §73.54 mandates that surety be maintained throughout the period of licensure. This change is designed to provide regulatory protection to prevent a school from canceling surety following approval for licensure.

The proposed amendment of §73.71 clarifies the licensure requirement for admissions representatives.

The proposed amendments of §73.81 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. The specific reference to quarter credits confirms the Board's current policy of allowing schools to use a quarter credit system. The current regulations do not provide for reporting progress in quarter credit hours. Some schools prefer to count credits in quarter hours and this proposed amendment will facilitate that flexibility. A few schools have proposed program names that do not represent the content of the instruction offered or are designed to imply a higher level of training or certification than is actually offered. This change would enable the Board to protect the public from potential misrepresentation.

The proposed amendment of §73.104 eliminates the maintenance of attendance records from the responsibilities of instructors. The Board does not require schools to take attendance, so this duty for instructors is no longer necessary.

The proposed amendment of §73.136 includes a student's failure to return from a leave of absence under the conditions for which a refund must be made within 30 days. The proposed amendment is designed to protect the student and guarantee a refund when a student fails to return from a leave of absence. It also protects the school from the potential implication that the refund was required within 30 days of the last date of student attendance even though the school could not have known the student would not return at that time.

The proposed amendment of §73.141 regarding issuance includes authorization for the Board to refuse to issue a license if the name of the school is misleading. The change is proposed to provide consistency with the proposed change to §73.52.

The proposed amendment of §73.151 specifies 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. This proposed amendment is designed to address an inequity in previous policy regarding fees, under which the original license application was accepted with an unlimited number of programs for one license application fee. A separate program approval fee was only required in cases where the program approval applications were submitted separately at a later time. The effort involved in reviewing each program was, however, similar,

and schools were submitting numerous programs upon initial licensure even if they would not immediately be offered, in order to avoid additional fees. The proposed amendment of §73.151 addresses this inequity by providing that only one new program application will be included in the initial \$1500 licensure fee. Applicants will need to pay the standard program application fee for each additional program application, regardless of whether those applications are submitted at the time of the license application or subsequently. This change will provide equity, with every school paying for the costs of Board and staff time and resources for program review and approval.

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

Fiscal Impact

There is minimal fiscal impact from the proposed changes. The requirement that all prospective applicants attend the orientation seminar will increase revenues from the \$200 fee for the seminar, but the revenue increase will be minimal, at \$10,000 or less.

Revenues will also be generated by the fees charged for each additional program application submitted with the initial license and new program application. These revenues 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 proposed 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.

Paperwork Requirement

The proposed changes to §73.21 - §73.23 will relieve the regulated community of paperwork requirements regarding the maintenance of student records.

The proposed change to §73.51 relieves the Board of the paperwork requirement of providing a signed receipt for all application materials received.

The proposed 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.

Effective Date

These proposed amendments take effect upon final publication in the Pennsylvania Bulletin. The Board's objective is to have the changes to the regulations in effect by July 1, 2003.

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)), on 6/10/03, 2003, the Board submitted a copy of this proposed rulemaking 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. A copy of this material is available to the public upon request.

Under Section 5(g) of the Regulatory Review Act, IRRC may convey any comments, recommendations or objections to the proposed regulations within 30 days of the close of the public comment period. The comments, recommendations or objections shall specify the regulatory review criteria that have not been met. The Act specifies detailed procedures for

review, prior to final publication of the regulation, by the Department, the General Assembly and the Governor of comments, recommendations or objections raised.

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. Patricia Landis, Coordinating Secretary, State Board of Private Licensed Schools, 333 Market Street, Harrisburg, PA 17126-0333, and (717) 783-8228, TTY#: (717) 783-8445.

By the State Board of Private Licensed Schools



Patricia Landis

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 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 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 and shall file an application for licensure or registration with the Board in the manner prescribed by the Board.

* * *

- (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:

* * *

- (5) 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 annually. 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.

* * *

§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

June 10, 2003

Robert E. Nyce
Executive Director
Independent Regulatory Review Commission
14th Floor, Harristown 2
333 Market Street
Harrisburg, PA 17101

Dear Mr. Nyce:

Enclosed is a copy of proposed regulations for review by your Committee pursuant to the Regulatory Review Act. The proposed regulations, Title 22 – Education, Chapter 73 General Provisions, Annex A (regulatory package #006-286) relate to the State Board of Private Licensed Schools.

The Regulatory Review Act provides that the standing committees may, within 20 days from the closing date of the public comment period, convey to the Department of Education their comments on the proposed regulations.

The Department of Education will provide your Committee 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 "Ernest N. Helling".

Ernest N. Helling
Assistant Chief Counsel

Cc: Vicki Phillips, Secretary of Education
Patricia Landis, State Board of Private Licensed Schools
Amy Foerster, PDE – Office of Chief Counsel

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

I.D. NUMBER: 006-286

SUBJECT: State Board of Private Licensed Schools - 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

RECEIVED
2003 JUN 10 PM 2:23
INDEPENDENT REGULATORY
REVIEW COMMISSION

FILING OF REGULATION

DATE	SIGNATURE	DESIGNATION
6/10/03	<i>Amia Perich</i>	HOUSE COMMITTEE ON EDUCATION
6-10-03	<i>Clara Thomas</i>	
6-10-03	<i>L. Hood</i>	SENATE COMMITTEE ON EDUCATION
6/10/03	<i>F. Creola</i>	
6/10/03	<i>Steve Page</i>	INDEPENDENT REGULATORY REVIEW COMMISSION
		ATTORNEY GENERAL (for Final Omitted only)
6/10/03	<i>William F. Brown</i>	LEGISLATIVE REFERENCE BUREAU (for Proposed only)

May 30, 2003