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INDEPENDENT REGULATORY
REVIEW COMMISSION

Alvin C. Bush, Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

RE: Regulation #6-297 (#2506)

Dear Mr. Bush:

I am writing in support of the State Board of Education's revised Chapter 31 regulation. Our 94 institutions with over 40,000 students appreciated the manner in which the regulation was developed with broad input from the higher education community. In addition, with the Independent Regulatory Review Commission's assistance, we were able to clarify some of the regulatory language and add a clear definition of general education.

While we support the regulation, we still have a related concern. Our agreement with the regulation hinged on the promise by the Department of Education to work with our association to develop clear guidelines for approving Associate in Specialized Technology and Associate in Specialized Business degrees (AST/ASB). These occupational and technically oriented degrees have a substantially different outcome and should not be judged by the same standard as traditional academic liberal arts degrees.

Recent regulatory interpretations by the Department have caused confusion and conflict with the institutions in the areas of general education, faculty, libraries and other regulatory areas. Our association believes that the Department must develop, in cooperation with our community of schools, a set of clear, written definitions and standards for AST/ASB visiting teams, Department staff and schools. In this way, we can avoid the confusion, inconsistency and changing opinions that have made it difficult for our institutions. We are anxiously awaiting the Department's first step in resolving this problem.

I want to thank the IRCC and especially John Jewitt for all the help on this regulation.

Sincerely,

Richard Dumaresq, Ed.D.
Executive Director

RD:ld

cc: Pennsylvania Department of Education