

To: Pennsylvania State Board of Education  
From: Association of Independent Colleges and Universities of Pennsylvania (AICUP)  
Date: February 13, 2006  
Re: Chapter 31 (General Provisions)

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As these regulations reach the final stage of discussion there are three areas that the regulations still have not addressed clearly. The AICUP requests that the Board review these three areas and adjust language as needed to clarify. These comments are submitted for the review and consideration of the State Board of Education. These comments are made by representatives of private colleges and universities but do not reflect an AICUP Board endorsed position. If you have questions regarding these comments, please contact Mary Young, Vice President for Government Relations at [AICUP-young@aicup.org](mailto:AICUP-young@aicup.org) or 717-232-8649.

- President and Board or Council of Trustees (31.12) (4) ***Oversight of institution-wide assessment.*** – It is unclear what this language means and institutions may interpret it in many different ways. This language could create a new and burdensome requirement on our boards. Some boards may be very involved in institutional assessment but others may be less so and appropriately don't need to be. Without additional clarification it is suggested that the State Board drop this requirement.
- Faculty (31.24)-Several comments came from the task force and others about the requirement pertaining to this change of language in this section.
  - (d) **The institution shall support professional development for all full-time, part-time and new faculty.** There is still a concern with the meaning of this requirement. It is not clear what "support" entails. Should the level of support be the same for full-time, part-time and new faculty? With closer examination of this issue, the state's role is unclear in determining support. This should be the responsibility of the higher education institution. Therefore, we ask that this requirement be eliminated.
- Student Records and Services (31.33)
  - **Institutions shall adopt a plan for the collection, maintenance and dissemination of student academic, counseling, health and other records. Copies of the plan shall be maintained by the institution and updated as required by changes in State or Federal law or local policy. Student records must be maintained in a readily accessible format.** We believe that this requirement should be dropped but if this is retained, please ensure that language at state level is consistent with FERPA requirements.

Original; 2506

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Original: 2506

**Gelnett, Wanda B.**

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**From:** Jewett, John H.  
**Sent:** Friday, May 12, 2006 3:39 PM  
**To:** IRRC  
**Cc:** Wyatte, Mary S.; Wilmarth, Fiona E.; Gelnett, Wanda B.  
**Subject:** FW: Chapter 31 comments

Please file this email and its attachments under "proposed comments" for file #2506.

MARY: Jim Buckheit didn't forward these to IRRC in March because he got them after the close of the public comment period.

However, shouldn't he have forwarded them to us and the Committees regardless of when they are received?

Should we suggest that he needs to forward copies to the committees, too?

-----Original Message-----

**From:** Buckheit, James [mailto:jbuckheit@state.pa.us]  
**Sent:** Friday, May 12, 2006 3:13 PM  
**To:** Jewett, John H.  
**Subject:** FW: Chapter 31 comments

John - As requested. Jim

-----Original Message-----

**From:** Mary Young [mailto:young@aicup.org]  
**Sent:** Thursday, March 30, 2006 11:42 AM  
**To:** Buckheit, James  
**Subject:** RE: Chapter 31 comments

Sorry I didn't respond sooner but was out of office. I have attached. Let me know if you need anything else.  
MARY

5/15/2006