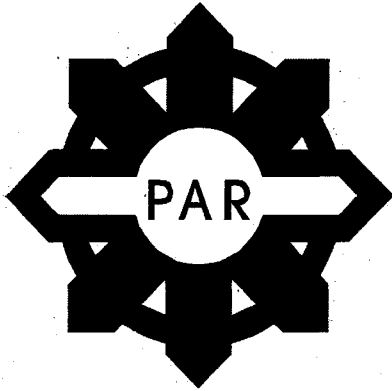


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Pennsylvania Association of Resources
for Autism and Intellectual Disabilities

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INDEPENDENT REGULATORY
REVIEW COMMISSION

1007 North Front Street
Harrisburg, PA 17102
Phone 717-236-2374
Fax 717-236-5625

Shauna C. Graves, Assistant Counsel
Department of State
210 North Office Building
Harrisburg, PA 17120-0039,

**Re: Proposed Rulemaking 51 Pa Code Chapter 53, Biennial Filing Fee – Published
in the October 17, 2009 edition of the *Pennsylvania Bulletin***

Dear Ms. Graves,

Thank you for the opportunity to provide comments on the above-referenced rule which proposes to increase the biennial registration fee for individuals and entities required to be registered under Act 134 from \$100 to \$200.

PAR is a 501(c)(3) nonprofit educational organization dedicated to improving the quality of services provided to people with autism and intellectual disabilities throughout the Commonwealth. To carry out our mission, we engage in advocacy and educational activities that are now defined as 'lobbying' under Act 134. As a result, PAR is defined as a 'principal' required to register under the law, which we have done in addition to complying with the related recordkeeping and reporting requirements.

Complying with Act 134 has not been inexpensive for PAR. Our costs are not limited to the current \$100 biennial registration fee; they also include personnel, office, operating and program expenses that enable us to be in full compliance. In addition, the economic downturn has increased the demand for services from charitable organizations such as ours while causing finances to be more strained.

Although an additional \$100 may not seem like much; please realize that increased costs are coming from every place imaginable and the cumulative burden is becoming more and more difficult to manage. Therefore, PAR respectfully requests that the Department not increase the biennial registration fee.

Thank you for considering our comments and recommendations.

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OFFICE OF CHIEF COUNSEL

Sincerely,

Shirley A. Walker
President and CEO