

# Regulatory Analysis Form

(Completed by Promulgating Agency)

INDEPENDENT REGULATORY  
REVIEW COMMISSION

(All Comments submitted on this regulation will appear on IRRC's website)

(1) Agency: Department of Education

(2) Agency Number:

Identification Number: 006-334

IRRC Number: # 3145

(3) PA Code Cite: 22 Pa. Code Chapter 73

(4) Short Title: : State Board of Private Licensed Schools

(5) Agency Contacts (List Telephone Number and Email Address):

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(6) Type of Rulemaking (check applicable box):

Proposed Regulation

Final Regulation

Final Omitted Regulation

Emergency Certification Regulation;

Certification by the Governor

Certification by the Attorney General

(7) Briefly explain the regulation in clear and nontechnical language. (100 words or less)

The regulation amends 22 Pa. Code §73.151 (relating to fees) as set forth in Annex A. The amendment to §73.151 increases Licensure Fees, Renewal Fees and User Fees for services provided by the Board.

(8) State the statutory authority for the regulation. Include specific statutory citation.

Section 4(a) and 10(a) of the Private Licensed Schools Act, Act No. 174 of 1986 (24 P.S. §§6504(a) and 6510(a)).

(9) Is the regulation mandated by any federal or state law or court order, or federal regulation? Are there any relevant state or federal court decisions? If yes, cite the specific law, case or regulation as well as, 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.

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Section 10(a) of the Private Licensed Schools Act (24 P.S. §6510(a)) requires the Board to increase its fees by regulation so that the projected revenues will meet or exceed projected expenditures when the revenue raised by fees, fines and civil penalties imposed under this act are not sufficient to meet Board expenditures over a two-year period. The current fees are fixed by 22 Pa. Code §73.151.

(10) State why the regulation is needed. Explain the compelling public interest that justifies the regulation. Describe who will benefit from the regulation. Quantify the benefits as completely as possible and approximate the number of people who will benefit.

The Private Licensed Schools Act empowered the Board to promulgate rules and regulations and to increase licensing fees to meet Board expenses. The Board's current fees are fixed by 22 Pa. Code §73.151. The Board has recently reviewed its fees and determined that current fees are inadequate to meet revenue needs.

Approximately 214,000 Pennsylvania students and approximately 270 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.

(11) 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 regulations.

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. Federal rules for financial aid eligibility rely on state oversight to license and regulate the schools.

(12) How does this regulation compare with those of the other states? How will this affect Pennsylvania's ability to compete with other states?

The Board collected data on fees in 25 other states. The fee structure is consistent with fees charged in other states. Pennsylvania does not compete with other states in the regulation of private career schools.

The following table shows the fees in the other states. In addition to the fees noted below, states also charge fees ranging from \$60 to \$1,750 for new programs, program changes, relocations, name changes, change in ownership, and complaint investigations. Some states bill schools for costs of services such as site visits. Note that many states fund the regulatory oversight through general fund appropriations that may be supplemented by fees. A blank in the table below indicates that the state did not provide this information. The other 25 states have not provided any information on fees.

| State          | Appropriation | Initial App Fee         | Renewal Period | Renewal Fee             |
|----------------|---------------|-------------------------|----------------|-------------------------|
| Alabama        | NO            | \$25                    | Biennial       | \$1,250 - \$15,000      |
| California     |               | \$500 + \$3,000/branch  | Annual         | \$3,500 - \$25,000      |
| Colorado       | NO            | \$1,750                 | Triennial      | \$1,750                 |
| Connecticut    | NO            | \$2,000                 | Annual         |                         |
| Florida        | NO            | \$2,500-\$7,000         |                |                         |
| Indiana        | YES           | \$1,000                 | Annual         | \$500                   |
| Iowa           |               | \$1,000                 | Biennial       | \$1,000                 |
| Maine          |               | \$100                   | Annual         | \$50                    |
| Massachusetts  | YES           | \$2,500                 | Biennial       | % of tuition            |
| Minnesota      | YES           | \$2,500 + \$500/program |                | \$1,150 + \$200/program |
| Mississippi    |               | \$2,500                 | Biennial       | \$1,000                 |
| Missouri       | YES           |                         | Annual         | \$500 plus .0013        |
| Montana        |               | none                    |                |                         |
| Nebraska       | YES           |                         |                |                         |
| Nevada         | YES           | \$2,000                 |                | \$4 fee per student     |
| New Hampshire  | NO            | \$3,000                 | Biennial       | \$350 - \$10,000        |
| New Jersey     |               | \$700                   |                | \$450                   |
| New Mexico     |               | \$1,000                 | Annual         |                         |
| New York       |               | \$5,000                 | Biennial       | \$750-\$18,00           |
| Ohio           | NO            | \$150-\$500             | Biennial       | \$300-\$1600            |
| Rhode Island   |               | \$1,000                 | Annual         | \$100                   |
| South Carolina |               |                         |                | \$150-\$5,500           |
| Texas          | NO            | \$3,000                 | Annual         | .3% of tuition          |
| Virginia       |               | \$25,000                | Annual         | \$500-\$2,500           |
| Wisconsin      | NO            | \$2,000                 | Annual         | % adequate for costs    |

(13) Will the regulation affect any other 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.

(14) Describe the communications with and solicitation of input from the public, any advisory council/group, small businesses and groups representing small businesses in the development and drafting of the regulation. List the specific persons and/or groups who were involved. ("Small business" is defined in Section 3 of the Regulatory Review Act, Act 76 of 2012.)

The Board's Executive Committee discussed and developed these regulatory changes. The Board has voted its intention to adopt these regulations. Nine of the Board's 15 members represent schools. The language has been distributed to the regulated community through the PAPSA professional association. In response to a request from the House Education Committee and PAPSA, the fee proposal was

adjusted and the fees were reduced to cover a five year projection of expenses instead of a ten-year projection as originally proposed.

(15) Identify the types and number of persons, businesses, small businesses (as defined in Section 3 of the Regulatory Review Act, Act 76 of 2012) and organizations which will be affected by the regulation. How are they affected?

Approximately seven new applicants for licensure and approximately 270 existing private licensed schools will be required to comply with these regulations.

(16) List the persons, groups or entities, including small businesses, that will be required to comply with the regulation. Approximate the number that will be required to comply.

Approximately 115 of the entities above that will be required to comply are small businesses.

(17) Identify the financial, economic and social impact of the regulation on individuals, small businesses, businesses and labor communities and other public and private organizations. Evaluate the benefits expected as a result of the regulation.

Approximately 214,000 Pennsylvania students and approximately 270 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.

The regulations enable the board to maintain quality standards to ensure that students are protected and receive quality career training. The regulations require the Board to establish fees and to be self-sustaining. The fee proposal was presented to the school community and amended at the request of the sector from an initial proposal of fees to sustain operations for ten years to the current lower fees to sustain operations for five years. With this adjustment, the sector has supported the fee and appreciates the self-funding model, which has sustained staff and services. One of the largest schools was concerned by the large increase in fees and that concern was accommodated by the cap in fees. A representative of that school sits on the Board and voted in support of the fee with the cap. An initial proposal to reorganize and reduce staffing was considered and rejected by the Board because the Board did not want to see any negative impact on services.

The self-funding model enables the Commonwealth to regulate the sector at no cost to tax payers and completely independent of the general fund. The cost per student reflected in the fee increase is negligible, but the benefits per student are significant in terms of protections.

(18) Explain how the benefits of the regulation outweigh any cost and adverse effects.

The Private Licensed Schools Act empowered the Board to promulgate rules and regulations and to increase licensing fees to meet Board expenses. The Board's current fees are fixed by 22 Pa. Code §73.151. The Board has recently reviewed its fees and determined that current fees are inadequate to

meet revenue needs.

By paying the fees established by the regulations, the schools protect the sector from abusive operators that prey on students. The fees also support staffing that provides the schools with services and support. The Board rejected a proposal to reduce the fee increase by realigning the staff because they did not want to reduce services and oversight.

(19) 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. Explain how the dollar estimates were derived.

Licensed schools will be required to pay an increased renewal fee every 2<sup>nd</sup> year. The fee for schools with revenue under \$5000 is set to increase from \$500 per year to \$1000. However, these schools paid \$1200 to maintain licensure from 1991 to 2002. The increase is still less than these schools paid in 1991. Schools with tuition of \$5,000 to \$9,999 will face no increase. Fees for small schools with annual tuition revenue ranging from \$10,000 to \$400,000 will face an increase of 8% to 50%. Current fees are capped at \$4,400 for any school earning over \$2,000,000 in revenue. This results in a regressive fee structure which requires the smaller schools to pay a significantly higher proportion of revenue than the largest schools.

The fee structure establishes a continuing assessment on revenues over \$1,000,000 to balance the cost more equitably between smaller and larger schools. The fees establish a cap of \$35,000 per biennial renewal for the schools with revenue that exceeds \$30 million. Schools with revenue between \$400,000 and \$1 million will pay 1% of revenue in fees. Schools with tuition over \$1 million will pay 0.1% on each additional \$500,000 of revenue.

Much of the fee increase is required to close the deficit that has accumulated since 2010. The surplus collected from 2002 to 2010 has been used to cover the deficit, but the surplus will soon be depleted.

While the change represents an increased fee per dollar of tuition revenue, the fee per student enrolled is actually reduced due to the dramatic increases in tuition rates since the fees were last changed in 2002.

The fees were derived by obtaining estimated costs for staffing from the Budget Office in the Department of Education to determine the amount of revenue that would be needed to sustain current services and meet regulatory obligations. Using renewal data from 2013-2014, fees were calculated based on the number of schools that would renew in each category and the amount of revenue that would be required.

Fees for initial licensure were increased from \$1500 to \$7500 because schools that enter the sector casually have been identified as a risk factor because sudden closure is often precipitated by financial distress. The increased fee also correlates more closely to the cost of processing new school applications, which require extensive review by professional staff.

Fees for seminar providers are projected to increase from \$750 to \$2000. The Board has not received any applications in this category since amending the regulations in 2002 to accommodate seminar providers at half the cost of a traditional license. This increase would establish the fee for seminar providers at 27% of the cost of applying for a traditional school license.

Fees for admission representatives and new program applications are projected to increase 100% to offset the remaining shortfall between operating costs and revenue. New program applications require extensive staff time for review and the costs of staffing have increased significantly since the last fee increase in 2002.

Site visit fees are to increase 50% to cover the increased costs of travel to conduct the visits.

Fees for change of ownership are projected to increase from \$1200 to \$5000 to parallel the cost of initial license application.

(20) Provide a specific estimate of the costs and/or savings to the **local governments** associated with compliance, including any legal, accounting or consulting procedures which may be required. Explain how the dollar estimates were derived.

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

(21) Provide a specific estimate of the costs and/or savings to the **state government** associated with the implementation of the regulation, including any legal, accounting, or consulting procedures which may be required. Explain how the dollar estimates were derived.

There will be no cost or savings to state government associated with compliance. However, by adjusting fees to cover a position that was traditionally covered by General Funds, the Board is providing a cost savings to state government.

(22) For each of the groups and entities identified in items (19)-(21) above, submit a statement of legal, accounting or consulting procedures and additional reporting, recordkeeping or other paperwork, including copies of forms or reports, which will be required for implementation of the regulation and an explanation of measures which have been taken to minimize these requirements.

There will be no additional legal, accounting or consulting procedures or additional reporting, recordkeeping or other paperwork, for the regulated community or state or local government.

(23) 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.

|                            | <b>Current FY<br/>Year</b> | <b>FY +1<br/>Year</b> | <b>FY +2<br/>Year</b> | <b>FY +3<br/>Year</b> | <b>FY +4<br/>Year</b> | <b>FY +5<br/>Year</b> |
|----------------------------|----------------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| <b>SAVINGS:</b>            | \$                         | \$                    | \$                    | \$                    | \$                    | \$                    |
| <b>Regulated Community</b> |                            |                       |                       |                       |                       |                       |
| <b>Local Government</b>    |                            |                       |                       |                       |                       |                       |

|                             |             |             |             |             |             |             |
|-----------------------------|-------------|-------------|-------------|-------------|-------------|-------------|
| <b>State Government</b>     | \$90,000    | \$90,000    | \$90,000    | \$90,000    | \$90,000    | \$90,000    |
| <b>Total Savings</b>        | \$90,000    | \$90,000    | \$90,000    | \$90,000    | \$90,000    | \$90,000    |
| <b>COSTS:</b>               |             |             |             |             |             |             |
| <b>Regulated Community</b>  | \$1,008,400 | \$1,008,400 | \$1,008,400 | \$1,008,400 | \$1,008,400 | \$1,008,400 |
| <b>Local Government</b>     |             |             |             |             |             |             |
| <b>State Government</b>     |             |             |             |             |             |             |
| <b>Total Costs</b>          |             |             |             |             |             |             |
| <b>REVENUE LOSSES:</b>      | N/A         | N/A         | N/A         | N/A         | N/A         | N/A         |
| <b>Regulated Community</b>  |             |             |             |             |             |             |
| <b>Local Government</b>     |             |             |             |             |             |             |
| <b>State Government</b>     |             |             |             |             |             |             |
| <b>Total Revenue Losses</b> | N/A         | N/A         | N/A         | N/A         | N/A         | N/A         |

(23a) Provide the past three year expenditure history for programs affected by the regulation.

| <b>Program</b>                        | <b>FY -3<br/>12-13</b> | <b>FY -2<br/>13-14</b> | <b>FY -1<br/>14-15</b> | <b>Current FY<br/>15-16</b> |
|---------------------------------------|------------------------|------------------------|------------------------|-----------------------------|
| Oversight of Private Licensed Schools | \$759,132              | \$695,942              | \$777,583              | \$922,000                   |
|                                       |                        |                        |                        |                             |
|                                       |                        |                        |                        |                             |
|                                       |                        |                        |                        |                             |
|                                       |                        |                        |                        |                             |

(24) For any regulation that may have an adverse impact on small businesses (as defined in Section 3 of the Regulatory Review Act, Act 76 of 2012), provide an economic impact statement that includes the following:

- (a) An identification and estimate of the number of small businesses subject to the regulation. Approximately 115 of the regulated schools are small businesses.
- (b) The projected reporting, recordkeeping and other administrative costs required for compliance with the proposed regulation, including the type of professional skills necessary for preparation of the report or record.  
The regulatory change does not require any additional reporting, recordkeeping or other administrative costs for compliance and no additional professional skills will be required.

(c) A statement of probable effect on impacted small businesses.

The impact on the small businesses is minimized because these schools fall into the categories with the lowest fee increases. Fees for the small businesses will increase 9% to 20% since 2002 and the greater cost burden will be shifted to the corporate schools.

(d) A description of any less intrusive or less costly alternative methods of achieving the purpose of the proposed regulation.

No less costly options are available to achieve the purpose of regulating the sector. Efforts to make significant reductions in costs would reduce quality and services.

(25) List any special provisions which have been developed to meet the particular needs of affected groups or persons including, but not limited to, minorities, the elderly, small businesses, and farmers.

The regulations only impact schools and benefit students and employers. The cost increase has been minimized for the schools that are small businesses as outlined above. The regulations will not impact minorities, the elderly, farmers or other special interests.

(26) Include a description of any alternative regulatory provisions which have been considered and rejected and a statement that the least burdensome acceptable alternative has been selected.

The Board considered a proposal to reduce and reorganize staff to reduce costs to reduce the amount of the fee increase. The Board rejected this proposal out of concern that a reduction in staffing would result in decreased services to the schools.

The sector is currently experiencing tremendous flux as a result of the recent recession but also as a direct result of changes in federal regulations and increased federal scrutiny. The 2010 federal Higher Education Opportunity Act (HEOA) established strict criteria for career schools to report job placements and salaries in relation to student debt. The reporting requirements went into effect in July 2015 and schools that fail to meet benchmarks risk losing eligibility to award federal financial aid. In addition, the U.S. Department of Education has increased oversight of providers, resulting in a number of investigations and charges against large chains of publicly traded corporations that operate schools. As a result of each of these factors, the number of schools operating in Pennsylvania has been reduced by 10% since 2010. Several of the schools that have closed were large providers that would have been expected to carry a significant portion of the Board's costs. The 10% reduction in the number of schools does not result in an equivalent 10% reduction in staff time because most services are not directly contingent on the number of schools. In addition, each school closure represents a significant drain on staff resources to provide support to displaced students. As schools adjust to the higher benchmarks for federal aid, they can be expected to discontinue some programs that cannot meet the standards and add additional programs that result in better debt to income ratios. Processing these additional program applications will require the current level of staffing to be maintained. With the implementation of the new federal regulations in July 2015, the Board anticipates that the number of closures has neared the maximum. The Board anticipates that the number of new school applicants can be expected to rise over the next five years as new schools can be expected to enter the sector to meet the market needs that have been created by recent closures. Attendance at the seminar that is mandatory for new school applicants has increased in 2015 with 65 attendees as compared to 46 in 2014. This indicates a likely increase in the number of applicants for licensure in 2016, which would indicate that any reduction in staffing



would be premature at this time. The projected fee increase is projected to cover operating costs at current staffing for approximately five years, taking into consideration the reduction in the number of schools and the closure of several large providers.

(27) In conducting a regulatory flexibility analysis, explain whether regulatory methods were considered that will minimize any adverse impact on small businesses (as defined in Section 3 of the Regulatory Review Act, Act 76 of 2012), including:

- a) The establishment of less stringent compliance or reporting requirements for small businesses;  
No reporting is required. The fee increase has been minimized for small businesses.
- b) The establishment of less stringent schedules or deadlines for compliance or reporting requirements for small businesses;  
No schedules or deadlines are established.
- c) The consolidation or simplification of compliance or reporting requirements for small businesses;  
No reporting is required.
- d) The establishment of performing standards for small businesses to replace design or operational standards required in the regulation; and  
No standards are established.
- e) The exemption of small businesses from all or any part of the requirements contained in the regulation.  
Small businesses are not exempt from the fee increase, but the increase has been minimized for the small businesses.

(28) If data is the basis for this regulation, please provide a description of the data, explain in detail how the data was obtained, and how it meets the acceptability standard for empirical, replicable and testable data that is supported by documentation, statistics, reports, studies or research. Please submit data or supporting materials with the regulatory package. If the material exceeds 50 pages, please provide it in a searchable electronic format or provide a list of citations and internet links that, where possible, can be accessed in a searchable format in lieu of the actual material. If other data was considered but not used, please explain why that data was determined not to be acceptable.

The data that was used to support the fees included projections of staffing costs over the next five years provided by the Office of Budget in the Department of Education and data on tuition revenue and previous renewal rates for Private Licensed Schools. Copies of this data are attached hereto.

(29) Include a schedule for review of the regulation including:

A. The date by which the agency must receive public comments: April 25, 2016

B. The date or dates on which public meetings or hearings will be held:

n/a

- C. The expected date of promulgation of the proposed regulation as a final-form regulation: December 1, 2016
- D. The expected effective date of the final-form regulation: December 1, 2016
- E. The date by which compliance with the final-form regulation will be required: December 1, 2016
- F. The date by which required permits, licenses or other approvals must be obtained: n/a

(30) Describe the plan developed for evaluating the continuing effectiveness of the regulations after its implementation.

Revenue and expenses will be monitored monthly by the division chief who will make a quarterly report to the Board. Continuing efforts will be made to contain costs with new and innovative strategies employed to provide consistent services at reduced costs. When revenue is no longer projected to cover costs for a minimum of 24 months, the Board will implement the process to increase fees.

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| <p>Copy below is hereby approved as to form and legality. Attorney General</p> <p>BY: _____<br/>(DEPUTY ATTORNEY GENERAL)</p> <p>_____<br/>DATE OF APPROVAL</p> <p><input type="checkbox"/> Check if applicable<br/>Copy not approved. Objections attached.</p> | <p>Copy below is here by certified to be a true and correct copy of a document issued, prescribed or promulgated by:</p> <p>Pennsylvania Department of Education<br/>_____<br/>(AGENCY)</p> <p>DOCUMENT/FISCAL NOTE NO. <u>006-334</u></p> <p>DATE OF ADOPTION: <u>July 29, 2016</u></p> <p>BY: <u>Patricia A. Landis</u></p> <p>TITLE <u>Board Secretary</u><br/>(EXECUTIVE OFFICER, CHAIRMAN OR SECRETARY)</p> | <p>Copy below is hereby approved as to form and legality. Executive or Independent Agencies.</p> <p>BY: <u>Marissa H. Z. Lehr</u></p> <p><u>SEP 01 2016</u><br/>DATE OF APPROVAL<br/><u>Deputy General Counsel</u><br/>(Chief Counsel, Independent Agency)<br/>(Strike inapplicable title)</p> <p><input type="checkbox"/> Check if applicable. No Attorney General approval or objection within 30 days after submission.</p> |
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FINAL RULEMAKING  
DEPARTMENT OF EDUCATION  
STATE BOARD OF PRIVATE LICENSED SCHOOLS  
22 PA. CODE CHAPTER 73

## NOTICE OF FINAL RULEMAKING

### PREAMBLE

#### DEPARTMENT OF EDUCATION STATE BOARD OF PRIVATE LICENSED SCHOOLS

[22 PA. CODE CH. 73]

### FEES

The State Board of Private Licensed Schools (Board), under the authority granted by the Private Licensed Schools Act (24 P.S. §§6501-6518), amends §73.151 (relating to fees) as set forth in Annex A.

#### *Description and Need for Amendments*

The amendment to §73.151(a) prescribes revised fees for biennial licensure or registration of all schools, and licensure of admissions representatives and the amendment to §73.151(b) increases the User Fees for other services provided by the Board. The Board's current fees are fixed by §73.151. Section 10 of the Private Licensed Schools Act (24 P.S. §6510) authorizes the Board to increase its fees by regulation if the Board's revenues from fees, fines and civil penalties are not sufficient to meet Board expenditures over a two-year period.

The Board recently reviewed its fees and determined that its existing fee structure was inadequate to meet revenue needs. The Board estimated that its expenditures for the biennial period covering Fiscal Years 2014-15 and 2015-16 would be \$1,955,300. In contrast, the estimated revenues under the existing fee structure were anticipated to be \$1,066,708. The projected shortfall of \$888,592 was covered by the surplus in the Board's revolving account, which is currently \$1,246,770, leaving a very minimal surplus to cover operating costs after July 1, 2016.

The fees at §73.151 should raise sufficient revenue to offset the Board's projected expenditures for approximately five years.

The Board last increased its fees on April 13, 2002. At that time, the Board projected that the fees would cover ten years of operating expenses. The 2002 fee structure sustained the Board's operation longer than anticipated.

The current staffing level will need to be maintained for the foreseeable future. While there has been no change to the actual number of staff supporting the work of the Board since 2002, one position dedicated to specialized associate degrees was covered by general funds until 2010 because the work is governed by regulations promulgated by the

State Board of Education. That position was transferred to the Board account in 2010 because the work services the Private Licensed School community. This change adds a financial burden on the Board's funds.

Revenue has been reduced in recent years as changes in federal regulations and economic conditions have resulted in a significant reduction in the number of licensed schools from 325 in 2002 to 270 today. While revenue is reduced in accordance with the number of schools renewing licenses, staffing needs are not directly tied to the number of schools because most services need to be provided regardless of the number of licensed schools.

Most of the Board's revenue is generated by renewal fees. After one year of operation, biennial renewal fees are on an assessed graduated scale based upon gross tuition revenue. Additional revenue is generated by other service fees.

The calculations below include a cap of \$35,000 that was accepted by the Board in May 2015 and used in these calculations. The original material did not clarify that this cap was in place. The largest schools are currently capped at \$4,400 and this proposed increase in the cap to \$35,000 will ensure that the largest schools carry more of the burden of funding the Board's operation.

To accommodate the need for additional revenue the Board is raising its current fees. The following table shows current fees and the amended fees :

|    | <u>Board Activity</u>   | <u>Current Fee</u> | <u>Amended Fee</u>   |
|----|---|--------------------|--|
| 1. | Initial School License  | \$1,500            | \$7,500  |
| 2. | Initial School License for Schools Presenting Only Seminars     | \$750              | \$2000   |
| 3. | Biennial School Licensure or Registration (as shown on Annex A) | \$500 - \$4,400    | \$1,000 - \$6,500 plus \$500 for each additional \$500,000 revenue over \$1,000,000 with a cap of \$35,000 |
| 4. | Admission Representatives License                               | \$300              | \$600  |
| 5. | New Program Application   | \$700              | \$1400   |
| 6. | Change of Ownership   | \$1,200            | \$5000   |
| 7. | New School Orientation  | \$200              | \$300  |

|     |                           |       |        |
|-----|---------------------------|-------|--------|
| 8.  | School Site Inspection    | \$500 | \$750  |
| 9.  | Board Directed Site Visit | \$500 | \$750  |
| 10. | Board Directed Team Visit | \$800 | \$1000 |

For the implementation of the renewal fees outlined in §73.151(a)(3), all schools will receive a reminder 11 weeks prior to the expiration of the license. Those schools that have already received the reminder prior to the effective date will renew in accordance with the prior fee schedule. Reminders sent following the effective date will include the new fee structure and the new renewal fees will be required.

*Summary of Comments and Responses to Proposed Rulemaking*

The Board published the notice of proposed rulemaking at 46 Pa.B. 1555 (March 26, 2016) with a 30-day public comment period. The Board received a general comment from the Pennsylvania Association of Private School Administrators acknowledging the need for an increase of fees and stating an appreciation for the Board's work on minimizing the fee amount. Additionally, on May 25, 2016, the Board received the comments from IRRC related to: the initial licensing and change of ownership fees; the implementation of the biennial fee for license and registration renewal; the new director seminar fee; the effective date; time frame; and summary of proposed amendments. The Board's responses to IRRC's comments are attached.

*Fiscal Impact and Paperwork Requirements*

The final from rulemaking will have no fiscal impact on the Commonwealth and political subdivisions and will, as required by law, impose costs upon the private sector sufficient to meet the Commonwealth's expenses in regulating the private licensed schools. The amendment requires the Board to alter some of its forms to reflect the new fees. Copies of these amended forms are attached. The amendments would create no additional paperwork for the private sector.

*Effective Date*

These amendments will become effective upon final adoption by the Board and publication in the Pennsylvania Bulletin. The Board's objective is to have the changes to the regulations in effect by December 1, 2016.

*Sunset Date*

The Private Licensed Schools Act requires that the Board monitor its revenue and cost on a biennial basis. Therefore, no sunset date has been assigned.

*Statutory Authority*

This rulemaking is authorized under section 10 of the Private Licensed Schools Act (24 P.S. §6510).

*Regulatory Review*

Under section 5(a) of the Regulatory Review Act (71 P.S. § 745.5(a)), on March 14, 2016, the Board submitted a copy of the notice of proposed rulemaking, published at 46 Pa.B. 1555 (March 26, 2016), to IRRC and the chairpersons of the Education Committees of the Senate and House of Representatives for review and comment.

Under section 5(c) of the Regulatory Review Act, IRRC and the 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 received from IRRC, the Committees and the public. On \_\_\_\_\_ the Board delivered final-form rulemaking to IRRC and the Committees. Under section 5.1(j.2) of the Regulatory Review Act (71 P.S. § 745.5a(j.2)), the final-form rulemaking was deemed approved by the Committees on \_\_\_\_\_. Under section 5.1(e) of the Regulatory Review Act, IRRC met on \_\_\_\_\_, and approved the final-form rulemaking.

Patricia Landis,  
Coordinating Secretary



**pennsylvania**  
DEPARTMENT OF EDUCATION

**TO:** Independent Regulatory Review Commission

**FROM:** Patricia Landis, Division Chief, Private Licensed Schools *Patricia A. Landis*

**RE:** Response to Comments of the Independent Regulatory Review Commission  
State Board of Private Licensed Schools Regulation #6-6334 (IRRC #(3145))

**DATE:** August 24, 2016

The following information is provided in response to the May 26, 2016 comments from the Independent Regulatory Review Commission on the proposed changes to the regulations of the Board of Private Licensed Schools.

**Comment:** The Board proposes in subsection (a) paragraph (1) to increase the original school license or registration fee from \$1,500 to \$7,500. ... The Board is also proposing to increase the fee for change of ownership from \$1,200 to \$5,000. ... These proposed fees represent a 400 percent and 317 percent increase over the current charges, respectively. The Board should explain how it determined that \$7,500 and \$5,000 are the appropriate amount of fees to charge.

**Response:** The increased fees correlate more closely to the cost of processing new school applications and change of ownership requests, which require extensive review by professional staff. Reviewing new school applications is the single most time-consuming responsibility of staff. The review of a new school application along with the initial new program application(s) requires a minimum of 20 professional staff hours for an application that is in very good order and 90 or more hours for review of an application that requires extensive review and multiple corrections, resubmission and resubmission review. Staff reviews more than 500 items on each application and crafts detailed correspondence tailored to each application to help the applicant make any necessary corrections. Staff also spends extensive time on the phone with applicants to help them understand the requirements of licensure.

Professional staff in the division must also contribute time and expertise to provide technical support to facilitate the electronic application process. PDE does not have adequate IT services to provide programming services for an electronic application and Board funds have not been available to contract for such services. As a result, Board staff has programmed the electronic application forms and professional staff must provide technical support to upgrade and maintain the applications. Support for the electronic application forms requires approximately 20 hours of professional staff time per quarter. Development and support of the electronic applications internally represents a cost savings to the Commonwealth and the Board estimated at a one time savings of \$400,000 and an annual cost savings for support of more than \$20,000. While PDE provided access to the Sharepoint software and support to set up the site, site maintenance and technical support for users is the responsibility of the Board's program staff. Support for new school applicants using the system for the first time requires approximately 5 hours of staff time per applicant and staff training to provide technical support outside their area of expertise requires approximately 50 hours per year. This translates to a cost per application of approximately \$300.



The average hourly cost for salaries and benefits for professional staff is \$58.40. The fees are projected to cover five years of operation and staffing costs are expected to rise a total of 10% over the next five years. In addition, brand new schools require extensive staff guidance during the first year of operation, which guidance is estimated to be approximately 25 hours per school. Thus, the total estimated annual cost for a newly licensed school is approximately \$7,700 in the worst case scenario and it is on that basis that we determined the fee for a new school license to be \$7,500. Fees for change of ownership are projected to increase from \$1200 to \$5000 to fully cover the costs of processing an ownership change. The \$5,000 fee for ownership changes is less than the cost of applying for a new school license because more of the work of processing an ownership change falls to the Board's Financial Review Committee rather than staff. Staff still spends about the same amount of time assisting the new owners in operating the school in the first year, but the time required for professional staff to review a change of ownership application is 50 hours or less.

In the past, the significant costs of new applications and ownership changes have been covered by the various service fees paid by the currently licensed schools, primarily through the renewal fee. It is not, however, equitable to place the cost of the review of new schools on the backs of existing schools, especially considering that most of the schools are for-profit businesses and the new schools will be competitors with the existing schools. Many other states cover costs with an appropriation and many also have a simpler application process that provides less protection for consumers. The PA Board sets an industry standard for rigor and detail. Recent federal actions against providers in a number of states with minimal standards have demonstrated the importance of Pennsylvania's rigorous and detailed review.

The 400% increase in the new school license fee does not represent a profit to the Board on the backs of applicants. Instead, it is designed to shift the cost of reviewing applications away from the existing schools and to cover those costs fully with fees paid by the applicant.

While the \$7500 fee may appear to be prohibitive to small operators, the fee represents a small fraction of the actual upfront costs of starting a school and a small fraction of the tuition revenue the school will collect. The fee is designed to recover actual costs and to encourage the provider to obtain adequate capitalization to ensure that the applicant's efforts and the staff time invested in review result in a viable, well-capitalized, start-up school with a realistic financial projection.

**Comment:** In RAF question #12, the Board remarks that "Pennsylvania does not compete with other states in the regulation of private career schools." The Board should include an explanation as to why it believes this to be the case.

**Response:** Pennsylvania does not compete with other states in the regulation of private career schools. The role of the Board and state policy is not to attract providers from other states or to establish an environment that encourages schools to set up operations in Pennsylvania instead of other states. The role of the Board is to protect the residents of Pennsylvania and to ensure that providers that seek to operate in the state meet minimum standards to ensure that students are given the service that they pay for. Each state has independent authority to regulate higher education and to determine the standards that providers will be required to meet. While Pennsylvania collaborates closely with other states to identify best practices, there is no competition with other states to attract schools or to establish stricter regulations or to be more lenient with schools. Pennsylvania is considered to be a leader in the field of the regulation of private career schools.

**Comment:** Since the duration and renewal of a license or registration is based on the original school license effective date, the Board should explain in the Preamble to the final rulemaking how Subsection (a) Paragraph (3) will be implemented.

**Response:** The following will be included in the Preamble. For the implementation of the renewal fees outlined in Subsection (a) Paragraph (3), all schools receive a reminder 11 weeks prior to the expiration of the license. Those schools that have already received the reminder prior to the effective date will renew in accordance with the prior fee schedule. Reminders sent following the effective date will include the new fee structure and the new renewal fees will be required.

**Comment:** Under Subsection (b)(6) the Board is proposing to charge a \$200 fee per school for participation in a "New Director Seminar." In response to RAF question #19, the Board indicates that the "New Director Seminar Fee will be charged on an attendee basis. A similar existing fee for "New School Orientation Seminar" is charged on a participant basis. ... The Board should either revise the language for the new fee to be consistent with other similar fees or explain its rationale for charging the "New Director Seminar" fee on a school participation basis.

**Response:** This fee has been eliminated as indicated in the next response. The Board has eliminated the proposed New Director Seminar Fee from the final form language.

**Comment:** Also, the Board states that the new fee is to offset the costs of mandatory training but it does not provide the statutory authority. The Board should include this information in its response to RAF question #19.

**Response:** The New Director Seminar Fee was not statutorily authorized, thus, the Board has eliminated this proposed fee from the final form language. The cost of providing the seminar will be covered by the licensure fees.

**Comment:** The Preamble states that the proposed rulemaking will become effective upon final-form publication in the *Pennsylvania Bulletin*. In response to RAF Question #29, the Board lists the expected effective date and the date by which compliance with the final-Form regulation will be required as July 1, 2016. The Board should revise its response to RAF Question #29 since it is unlikely that the final rulemaking will be published by that date.

**Response:** The expected effective date has been revised to December 1, 2016.

**Comment:** The Board last increased its fees in 2002. ... The Board should explain in detail the circumstances which led to the delay in requesting incremental fee increases and any alternatives it considered.

**Response:** The fee increase established in 2002 was projected to cover costs for 10 years. These fees have actually covered more than 14 years of operation through cost-saving measures and because of vacancies in positions for significant periods of time. The Board cut operating costs by reducing the number of Board meetings from five each year to four annual meetings. An electronic application was introduced to increase efficiency and reduce administrative costs such as mailings and copying. Staff travel has been consolidated to cover at least two visits with each trip whenever possible and attendance at regional and national conferences has been limited. The Board never anticipated increasing fees incrementally. Instead, the 2002 fees were established to cover projected costs until 2012, at which time the

Board anticipated promulgating regulations to raise the fees enough to cover projected costs for an additional ten years.

In 2015, when the need for additional revenue became apparent, staff initially proposed a reorganization to have more services provided by administrative staff at lower salaries and to reduce the number of audits of the schools to eliminate two positions and downgrade two positions. The Board considered the proposal and rejected it on the grounds that the professional level services are needed to provide adequate support to schools and a reduction in staff and oversight would have a negative impact on the sector and the public. All viable cost cutting measures have been implemented and no additional avenue is seen to maintain services without a fee increase. The impact of the fee increase has been ameliorated for schools by projecting the fees to cover five years instead of the original ten years. The school sector has demonstrated an appreciation that the current fees were stretched for more than 40% longer than anticipated and no protests have been received regarding the proposed increase. PAPSA, the professional association representing the schools, responded in support of the proposed changes to increase the fees. This was the only comment received in response to the publication of the proposed fee increase.

**Comment:** A description of the proposed "New Director Seminar" fee was not provided in the Preamble. The Board should include a description of the new fee in the Preamble of the final-form rulemaking.

**Response:** The Board has eliminated the proposed New Director Seminar Fee from the final form language.

This is a reminder that your license as a Private Licensed School will expire on December 1, 2016. Your renewal application and payment are due in this office by November 7, 2016. This is a courtesy reminder. The Board of Private Licensed Schools has determined that it is the responsibility of each school to renew the license in a timely fashion, but we want to assist you in the process with this reminder of the deadline.

Please be sure to submit the renewal application by November 7, 2016. The renewal application form is attached. It is also available on the website at [www.education.pa.gov/PLS](http://www.education.pa.gov/PLS).

Please note that the renewal application must be submitted on-line in accordance with the instructions in the application form. The check must be mailed. Please be sure to request the check and have it mailed to arrive by November 7, 2016.

Please note that the fees for the license renewal have increased. Please submit the appropriate renewal fee in accordance with gross tuition revenue for your most recently completed fiscal year. The chart of fees is provided on the tab named PDE-3123 on the renewal form.

If the renewal and fee are not received in this office by December 1, 2016, the license will expire. The Board of Private Licensed Schools has determined that an expired license cannot be renewed. If the license expires, it will be necessary to suspend operations until the school has applied for a new license through the new school licensure application process and the new license has been approved by the Board.

Please be sure to submit your renewal application on this form by November 7, 2016.

**PDE-3123 APPLICATION FOR RENEWAL OF LICENSE/REGISTRATION**

Complete the tab areas below by following the instructions for each item. Carefully review your application so it contains each enclosure requested below. If you have questions about the renewal application, please call the Board staff at 717-783-8228.

*Please complete the school information in the block below:*

|                     |      |       |     |
|---------------------|------|-------|-----|
| <b>School Name:</b> |      |       |     |
| <b>Address:</b>     |      |       |     |
| <b>Address 2:</b>   |      |       |     |
|                     | City | State | Zip |

**1. Verification by Director or CEO**

My typed name below certifies that the information reported herein is true and accurate.

|  |  |
|--|--|
| <b>Name of School Director or CEO:</b> |  |
| <b>Date:</b>                           |  |

**2. Renewal Fee**

Your renewal fee must be sent by either a check or money order made payable to the Pennsylvania Department of Revenue. The amount of your renewal fee depends on your school's gross tuition revenue in its most recently completed fiscal year. For registered (out-of-state) schools, the amount depends on the gross tuition revenue from Pennsylvania residents only.

*Use the table below to determine the correct amount for your school.*

| <u>Gross Tuition Revenue</u> | <u>Amount of Fee</u>  |
|------------------------------|---|
| \$0- \$4,999                 | \$1,000   |
| \$5,000-9,999                | \$2,000   |
| \$10,000-49,999              | \$2,500   |
| \$50,000-99,999              | \$2,700   |
| \$100,000-149,000            | \$2,800   |
| \$150,000-199,999            | \$3,000   |
| \$200,000- 249,999           | \$3,500   |
| \$250,000-299,999            | \$4,000   |
| \$300,000 - 399,999          | \$4,500   |
| \$400,000 - 499,999          | \$5,000   |
| \$500,000- 749,999           | \$5,500   |
| \$750,000-999,999            | \$6,000   |
| \$1,000,000 and over         | \$6,500 plus \$500 for each additional \$500,000 in revenue with \$35,000 cap |

*Indicate payment amount for renewal fee:*

ANNEX A

Title 22. EDUCATION

PART III. STATE BOARD OF PRIVATE LICENSED SCHOOLS

CHAPTER 73. GENERAL PROVISIONS

§ 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~~] **\$7500**. The fee for an original school license or registration includes the user fee for the application for approval of one 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 subsection (b)(1).
- (2) For an original school license or registration of a school that only presents seminars – [~~\$750~~] **\$2000**.
- (3) For a renewal school license or registration -biennial fee based on gross tuition revenue:

| Gross Tuition Revenue                         | Fee                                    |
|---|--|
| \$0- <del>[2,499]</del> <b><u>\$4,999</u></b> | <del>[\$500]</del> <b><u>1,000</u></b> |

|                                    |  |
|------------------------------------|--|
| [\$2,500-4,999                     | \$1,000]   |
| \$5,000-9,999                      | \$2,000  |
| \$10,000-49,999                    | [\$2,200] <u>2,500</u>   |
| \$50,000-99,999                    | [\$2,300] <u>2,700</u>   |
| \$100,000-[199,999] <u>149,000</u> | [\$2,600] <u>2,800</u>   |
| <u>\$150,000-199,999</u>           | <u>\$3,000</u>   |
| \$200,000-[499,999] <u>249,999</u> | [\$3,000] <u>3,500</u>   |
| <u>\$250,000-299,999</u>           | <u>\$4,000</u>   |
| <u>\$300,000 – 399,999</u>         | <u>\$4,500</u>   |
| <u>\$400,000 – 499,999</u>         | <u>\$5,000</u>   |
| \$500,000-[999,999] <u>749,999</u> | [\$3,500] <u>5,500</u>   |
| <u>\$750,000–999,999</u>           | <u>\$6,000</u>   |
| [\$1,000,000-1,999,999             | \$4,100  |
| \$2,000,000 and over               | \$4,400]   |
| <u>\$1,000,000 and over</u>        | <u>\$6,500 plus \$500 for each</u><br><u>additional \$500,000</u><br><u>in revenue with \$35,000 cap</u> |

(4) For an admission representative license -- \$[300] 600 annually.

(b) User fees. Fees will also be assessed for other services provided by the Board, which services are in addition to the processing and issuance of original or renewal school licenses or registration and admissions representative licenses.

These user fees are as follows:

(1) A \$[700] 1400 fee shall accompany each application for approval of a new program.

(2) A \$[1200] 5,000 fee shall accompany notification to the Board of a change in ownership of the school.

(3) A \$[200] 300 fee per participant will be charged for participation in new school orientation seminars.

(4) A \$[500] 750 fee will be charged for each site inspection of the following types: new school, change in location, expansion of instructional space, temporary relocation, branch facility and remote training facility. This fee shall be paid before commencement of the visit.

(5) The fee for a Board-directed visit is \$[500] 750 per day if the visit is conducted by staff; \$[800] 1000 per day plus team member expenses for a visit conducted by a team with nonstaff members. The fee for a Board-directed visit shall be paid before commencement of the visit.

~~(6) A \$200 fee per school will be charged for participation in a new director seminar.~~

\* \* \* \* \*



**Private Licensed Schools Office**  
**FY 2015-2025**  
**10 Year Projection**

Salary/Benefit Costs

|              |    |                     |
|--------------|----|---------------------|
| FY 2015-2016 | \$ | 899,483.94          |
| FY 2016-2017 | \$ | 916,817.69          |
| FY 2017-2018 | \$ | 934,584.78          |
| FY 2018-2019 | \$ | 952,796.04          |
| FY 2019-2020 | \$ | 971,462.59          |
| FY 2020-2021 | \$ | 990,595.80          |
| FY 2021-2022 | \$ | 1,010,207.34        |
| FY 2022-2023 | \$ | 1,030,309.17        |
| FY 2023-2024 | \$ | 1,050,913.55        |
| FY 2024-2025 | \$ | <u>1,072,033.03</u> |
| TOTAL        | \$ | 9,829,203.93        |

Projections are based on current complement with a 2.5% increase each fiscal year and three clerical staff at 75%

**Department of Education  
Bureau of Postsecondary Services  
State Board of Private Licensed Schools  
Fund 6001800000**

**EXPENDITURES**

|                           | <b>Budgeted<br/>FY 2015-16</b> | <b>Average Per Year for Next 5 Years</b> |
|---------------------------|--------------------------------|--|
| Salaries/Benefits         | \$822,000                      | 935,029                                  |
| Operating                 | \$68,000                       | 74,200                                   |
| <b>Total Expenditures</b> | <b>\$890,000</b>               | <b>1,009,229</b>                         |

**REVENUE**

**License Fees**

|                     |           |                     |
|---------------------|-----------|---------------------|
| School Renewals     | \$415,900 | 726,350             |
| New School Licenses | \$15,000  | 52,500 7 at 7500    |
| Admissions Reps     | \$36,000  | 72,000 120 at \$600 |
| Refund of Revenue   | \$0       |                     |

**User Fees**

|                          |          |                       |
|--------------------------|----------|-----------------------|
| New Program Applications | \$47,600 | \$95,200 68 at \$1400 |
| Change of Ownership      | \$6,000  | \$25,000 5 at \$5000  |
| New School Orientations  | \$9,400  | \$14,100 47 at \$300  |
| School Site Inspections  | \$7,500  | \$11,250 15 at 750    |

|                      |                  |                |
|----------------------|------------------|----------------|
| <b>Total Revenue</b> | <b>\$537,400</b> | <b>996,400</b> |
|----------------------|------------------|----------------|

| School Name  | Zip Code | City           | County       | Exp. Date | Am't Paid | Annual Tuition Revenue | New 2016 Fees | Projected Renewal Fee |
|--|----------|----------------|--------------|-----------|-----------|------------------------|---------------|-----------------------|
| AAA School of Trucking, Ltd. - Harrisburg                  | 17112    | Harrisburg     | Dauphin      | 8/1/2016  | 3500.00   | 600,000.00             |               | \$5,500.00            |
| AAA School of Trucking, Ltd. - Philadelphia                | 19125    | Philadelphia   | Philadelphia | 8/1/2016  | 4400.00   | 1,500,000.00           |               | \$7,000.00            |
| AAASP-PA Automotive School                                 | 17104    | Harrisburg     | Dauphin      | 11/1/2016 | 500.00    | 0.00                   |               | \$1,000.00            |
| Academy for Media Production (The)                         | 17325    | Gettysburg     | Adams        | 5/1/2016  | 3000.00   | 469,280.00             |               | \$5,000.00            |
| Academy of Investigation & Protection                      | 15061    | Monaca         | Beaver       | 12/1/2015 | 500.00    | 0.00                   |               | \$1,000.00            |
| Academy of Massage Therapy and Bodyworks                   | 19464    | Pottstown      | Montgomery   | 1/1/2016  | 3000.00   | 252,000.00             |               | \$4,000.00            |
| ACTS Health Services Institute                             | 19002    | Ambler         | Montgomery   |           | 2,300     | 3200.00                |               | \$1,000.00            |
| Albert School (The)  | 19027    | Elkins Park    | Montgomery   | 8/1/2016  | 500.00    | 0.00                   |               | \$1,000.00            |
| Allentown Bartender School                                 | 18052    | Whitehall      | Lehigh       | 8/1/2016  | 2600.00   | 283,910.00             |               | \$4,000.00            |
| All-State Career School                                    | 19029    | Essington      | Delaware     | 7/1/2015  | 4400.00   | 6,000,000.00           |               | \$11,500.00           |
| All-State Career School                                    | 15137    | Pittsburgh     | Allegheny    | 4/1/2016  | 4400.00   | 6,000,000.00           |               | \$11,500.00           |
| All-State Career School                                    | 19029    | Lester         | Delaware     | 8/1/2015  | 4400.00   | 6,500,000.00           |               | \$12,000.00           |
| American Advanced Institute of Technology                  | 18974    | Warminster     | Bucks        | 4/1/2015  | 2300.00   | 115,800                |               | \$2,800.00            |
| American Home Inspectors Training Institute, LTD           | 18017    | Bethlehem      | Lehigh       | 1/1/2015  | 3000.00   | 55,600                 |               | \$2,700.00            |
| American Red Cross-SEPA Nurse Asst. Training Inst.         | 19104    | Philadelphia   | Philadelphia | 3/1/2015  | 3000.00   | 316,579.00             |               | \$4,500.00            |
| Antonelli Institute  | 19038    | Erdenheim      | Montgomery   | 3/1/2015  | 4400.00   | 5,000,000.00           |               | \$10,500.00           |
| Antonelli Medical and Professional Institute               | 19464    | Pottstown      | Montgomery   | 7/1/2015  | 3500.00   | 700,000.00             |               | \$5,500.00            |
| Apprentice Training for the Electrical Industry (ATEI)     | 19130    | Philadelphia   | Philadelphia | 6/1/2016  | 500.00    | 0.00                   |               | \$1,000.00            |
| At-Home Professions  | 80525    | Fort Collins   | Out-of-State | 8/1/2015  | 2600.00   | 223,775.00             |               | \$3,500.00            |
| Automotive Training Center                                 | 19341    | Exton          | Chester      | 7/1/2015  | 4400.00   | 9,500,000.00           |               | \$15,000.00           |
| Automotive Training Center - Warminster                    | 18974    | Warminster     | Bucks        | 11/1/2016 | 4400.00   | 5,000,000.00           |               | \$10,500.00           |
| Automotive Training Certification Center                   | 19002    | Ambler         | Montgomery   | 8/1/2016  | 2300.00   | 25,766.00              |               | \$2,500.00            |
| Aviation Institute of Maintenance                          | 19114    | Philadelphia   | Philadelphia | 2/1/2016  | 4400.00   | 13,500,000.00          |               | \$19,000.00           |
| Baltimore School of Massage                                | 17402    | York           | York         | 9/1/2016  | 4100.00   | 600,000.00             |               | \$5,500.00            |
| Berks Technical Institute                                  | 19610    | Wyomissing     | Berks        | 5/1/2016  | 4400.00   | 17,500,000.00          |               | \$23,000.00           |
| Bidwell Training Center Inc                                | 15233    | Pittsburgh     | Allegheny    | 7/1/2016  | 4400.00   | 5,000,000.00           |               | \$10,500.00           |
| Bill Allens Pocomo Institute of Taxidermy                  | 18661    | White Haven    | Luzerne      | 10/1/2016 | 2300.00   | 32,310.00              |               | \$2,500.00            |
| Blackstone Career Institute                                | 18049    | Emmaus         | Lehigh       | 7/1/2016  | 2300.00   | 55,593.00              |               | \$2,700.00            |
| Bordentown Driver Training School, LLC                     | 19137    | Philadelphia   | Philadelphia | 9/1/2016  | 4100.00   | 750,000.00             |               | \$6,000.00            |
| Bordentown Driver Training School, LLC, DBA/Smith & Solomc | 18641    | Duport         | Luzerne      | 12/1/2015 | 3500.00   | 626,037.00             |               | \$5,500.00            |
| Bradford School  | 15219    | Pittsburgh     | Allegheny    | 7/1/2015  | 4400.00   | 9,500,000.00           |               | \$15,000.00           |
| Bridgeway High School                                      | 18032    | Catasauqua     | Lehigh       | 9/1/2016  | 1000.00   | 2,089.00               |               | \$1,500.00            |
| Brightwood Career Institute ( Broomall)                    | 19008    | Broomall       | Delaware     | 7/1/2015  | 4400.00   | 6,000,000.00           |               | \$5,000.00            |
| Brightwood Career Institute (Franklin Mills)               | 19154    | Southampton    | Philadelphia | 11/1/2015 | 4400.00   | 495,000.00             |               | \$5,500.00            |
| Brightwood Career Institute (Harrisburg)                   | 17111    | Harrisburg     | Dauphin      | 7/1/2016  | 4400.00   | 708,487.00             |               | \$7,500.00            |
| Brightwood Career Institute (Market)                       | 19104    | Philadelphia   | Philadelphia | 7/1/2016  | 4400.00   | 2,000,000.00           |               | \$15,500.00           |
| Brightwood Career Institute (Pittsburgh)                   | 15222    | Pittsburgh     | Allegheny    | 3/1/2015  | 4400.00   | 10,000,000.00          |               | \$1,000.00            |
| Brockway Center for Arts and Technology                    | 15824    | Brockway       | Jefferson    | 5/1/2017  | 500.00    | 0.00                   |               | \$4,500.00            |
| Bucks County School of Bartending                          | 19020    | Bensalem       | Bucks        | 12/1/2016 | 3000.00   | 346,135.00             |               | \$4,500.00            |
| Capitol Bartending School                                  | 17110    | Harrisburg     | Dauphin      | 6/1/2016  | 3000.00   | 319,163.00             |               | \$1,000.00            |
| Care First Career Institute                                | 19082    | Upper Darby    | Delaware     |           | 500.00    | 3,800.00               |               | \$1,000.00            |
| Career Training Academy                                    | 15068    | New Kensington | Westmoreland | 3/1/2016  | 4100.00   | 1,500,000.00           |               | \$7,000.00            |
| Career Training Academy/Monroeville                        | 15146    | Monroeville    | Allegheny    | 5/1/2015  | 4400.00   | 1,500,000.00           |               | \$7,000.00            |
| CDE Career Institute                                       | 18372    | Tannersville   | Monroe       | 8/1/2016  | 3000.00   | 452,000.00             |               | \$5,000.00            |
| Central Pennsylvania Diesel Institute                      | 16866    | Phillipsburg   | Perry        | 7/1/2015  | 3000.00   | 267,000.00             |               | \$4,000.00            |
| Central Pennsylvania Institute of Science and Technology   | 16823    | Pleasant Gap   | Centre       | 6/1/2016  | 500.00    | 120,000.00             |               | \$2,800.00            |
| Chambersburg Beauty School                                 | 17201    | Chambersburg   | Franklin     | 1/1/2016  | 1000.00   | 2,500.00               |               | \$1,000.00            |
| Commonwealth Technical Institute                           | 15905    | Johnstown      | Cambridia    | 7/1/2015  | 4400.00   | 5,500,000.00           |               | \$11,000.00           |

|   |                      |              |           |          |              |             |
|---|----------------------|--------------|-----------|----------|--------------|-------------|
| Community Training Institute                                    | 15401 Uniontown      | Fayette      | 10/1/2016 | 1000.00  | 2,850.00     | \$1,000.00  |
| Consolidated School of Business/Lancaster                       | 17603 Lancaster      | Lancaster    | 3/1/2015  | 4100.00  | 1,500,000.00 | \$7,000.00  |
| Consolidated School of Business/York                            | 17404 York           | York         | 3/1/2015  | 4100.00  | 1,500,000.00 | \$7,000.00  |
| Contemporary Health Career Institute, Inc.                      | 19341 Exton          | Chester      | 12/1/2016 | 2300.00  | 131,347.00   | \$2,800.00  |
| Cortiva Institute - Pennsylvania School of Muscle Therapy, Ltd. | 19456 Oaks           | Montgomery   | 11/1/2015 | 4400.00  | 2,000,000.00 | \$7,500.00  |
| Creative Academy  | 19054 Trevoze        | Bucks        | 7/1/2015  | 500.00   | 4,500.00     | \$1,000.00  |
| DCI Career Institute  | 15061 Beaver Falls   | Beaver       | 7/1/2015  | 4100.00  | 750,000.00   | \$6,000.00  |
| DCS School of Driving, LLC                                      | 17401 York           | York         | 12/1/2016 | 3000.00  | 333,500.00   | \$4,500.00  |
| Dean Institute of Technology                                    | 15226 Pittsburgh     | Allegheny    | 11/1/2015 | 4100.00  | 1,000,000.00 | \$6,500.00  |
| Dental Careers Institute  | 19348 Kennett Square | Chester      | 2200.00   | 3,700.00 |              | \$1,000.00  |
| Detail King Auto Detailing Training Institute, LLC              | 15239 Pittsburgh     | Allegheny    | 6/1/2015  | 2600.00  | 172,998.00   | \$3,000.00  |
| Divers Academy International                                    | 18967 Northampton    | Northampton  | 5/1/2015  | 500.00   | 0.00         | \$1,000.00  |
| Dog Grooming School of Pennsylvania                             | 19123 Philadelphia   | Bucks        | 12/1/2016 | 500.00   | 2,000.00     | \$1,000.00  |
| Dotlan Academy of Science                                       | 19401 Norristown     | Montgomery   | 3/1/2016  | 2200.00  | 24,486.00    | \$2,500.00  |
| Douglas Education Center  | 15062 Monessen       | Westmoreland | 11/1/2015 | 4400.00  | 5,500,000.00 | \$11,000.00 |
| Dubois Business College/DuBois                                  | 15801 DuBois         | Clearfield   | 3/1/2015  | 4100.00  | 1,000,000.00 | \$6,500.00  |
| Dubois Business College/Huntingdon                              | 16652 Huntingdon     | Huntingdon   | 2/1/2015  | 3500.00  | 710,125.00   | \$5,500.00  |
| Dubois Business College/Oil City                                | 16301 Oil City       | Venango      | 12/1/2016 | 3000.00  | 428,231.00   | \$5,000.00  |
| East Coast Institute of Taxidermy                               | 18660 Hazelton       | Luzerne      | 2/1/2015  | 500.00   | 4,500.00     | \$1,000.00  |
| East-West School of Massage Therapy                             | 19610 Wyomissing     | Berks        | 10/1/2016 | 2200.00  | 50,135.00    | \$2,700.00  |
| Education and Technology Institute                              | 15601 Greensburg     | Westmoreland | 8/1/2016  | 500.00   | 0.00         | \$1,000.00  |
| Educational Correspondence Training School, LLC                 | 16506 Erie           | Erie         | 8/1/2015  | 1000.00  | 4,500.00     | \$1,000.00  |
| Elite Bartending School   | 15216 Pittsburgh     | Allegheny    | 7/1/2016  | 2600.00  | 267,761.00   | \$4,000.00  |
| Entry Level Nurse Aide Program                                  | 19119 Philadelphia   | Philadelphia | 3/1/2015  | 3000.00  | 376,421.00   | \$4,500.00  |
| Erie Institute of Technology                                    | 16565 Erie           | Erie         | 11/1/2015 | 4400.00  | 4,500,000.00 | \$10,000.00 |
| European Medical School of Massage LLC                          | 19608 Sinking Spring | Berks        | 12/1/2016 | 500.00   | 52,759.00    | \$2,700.00  |
| Falcon Educational Services, Inc.                               | 18042 Easton         | Northampton  | 11/1/2016 | 2200.00  | 14,350.00    | \$2,500.00  |
| Fayette Institute of Commerce and Technology, Inc.              | 15401 Uniontown      | Fayette      | 7/1/2016  | 2300.00  | 129,289.00   | \$2,800.00  |
| Finishing Trades Institute of the Mid-Atlantic Region           | 19116 Philadelphia   | Philadelphia | 7/1/2015  | 500.00   | 0.00         | \$1,000.00  |
| Fortis Institute  | 16506 Erie           | Erie         | 7/1/2015  | 4400.00  | 230,000.00   | \$3,500.00  |
| Fortis Institute  | 18704 Fort Fort      | Luzerne      | 3/1/2016  | 4400.00  | 4,500,000.00 | \$10,000.00 |
| Fortis Institute  | 18509 Scranton       | Lackawanna   | 7/1/2015  | 4400.00  | 7,000,000.00 | \$12,500.00 |
| Full Circle Computing   | 19341 Exton          | Chester      | 11/1/2016 | 500.00   | 5,500.00     | \$2,000.00  |
| Global Power Line Academy                                       | 16648 Hollidaysburg  | Blair        | 8/1/2015  | 2300.00  | 55,187.00    | \$2,700.00  |
| Golden Paws Pet Styling Academy                                 | 15520 Pittsburgh     | Allegheny    | 7/1/2016  | 2300.00  | 107,159.00   | \$2,800.00  |
| Goodwill Employment Training Center                             | 15203 Pittsburgh     | Allegheny    | 12/1/2016 | 500.00   | 0.00         | \$1,000.00  |
| Goodwill Employment Training Center (Fayette Campus)            | 15401 Uniontown      | Fayette      | 2/1/2015  | 500.00   | 0.00         | \$1,000.00  |
| Great Lakes Institute of Technology                             | 16509 Erie           | Erie         | 3/1/2015  | 4400.00  | 5,000,000.00 | \$10,500.00 |
| Harris School of Business                                       | 19082 Upper Darby    | Delaware     | 12/1/2015 | 4400.00  | 350,000.00   | \$4,500.00  |
| Health & Technology Training Institute                          | 19110 Philadelphia   | Philadelphia | 7/1/2015  | 2600.00  | 247,732.00   | \$3,500.00  |
| Health Options Institute  | 18020 Bethlehem      | Northampton  | 10/1/2016 | 2600.00  | 220,962.00   | \$3,500.00  |
| HR School of Alternative Therapy                                | 19027 Melrose Park   | Montgomery   | 3/1/2015  | 3000.00  | 383,963.00   | \$4,500.00  |
| HVA EduCenter   | 16506 Erie           | Erie         | 8/1/2015  | 2600.00  | 234,475.00   | \$3,500.00  |
| Industrial Training and Testing Institute                       | 19137 Philadelphia   | Philadelphia | 8/1/2015  | 2600.00  | 120,029.00   | \$2,800.00  |
| Institute for Caregiver Education                               | 17202 Chambersburg   | Franklin     | 5/1/2015  | 2300.00  | 156,185.00   | \$3,000.00  |
| Institute for Therapeutic Massage and Bodywork Inc              | 19317 Chadds Ford    | Delaware     | 10/1/2016 | 500.00   | 5,800.00     | \$2,000.00  |
| Institute of Medical Careers                                    | 15203 Pittsburgh     | Allegheny    | 12/1/2016 | 3000.00  | 333,844.00   | \$4,500.00  |
| Institute of Medical and Business Careers                       | 16506 Erie           | Erie         | 12/1/2015 | 2200.00  | 30,527.00    | \$2,500.00  |
| Integrative Bodywork School of Massage Therapy                  | 16801 State College  | Centre       | 12/1/2016 | 2600.00  | 155,319.00   | \$3,000.00  |

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| International School of Shiatzu                         | 18901 | Doylestown       | Bucks        | 2/1/2016  | 2300.00 | 110,898       | \$2,800.00  |
| ITLS - Nuclear Technical Institute                      | 15238 | Pittsburgh       | Allegheny    |           | 500.00  | 0             | \$1,000.00  |
| ITT Technical Institute/Lewistown                       | 19020 | Lewistown        | Bucks        | 8/1/2015  | 4400.00 | 11,000,000.00 | \$16,500.00 |
| ITT Technical Institute/Philadelphia                    | 19406 | Plymouth Meeting | Philadelphia | 8/1/2016  | 4400.00 | 18,500,000.00 | \$24,000.00 |
| ITT Technical Institute/Plymouth Meeting                | 15108 | Coraopolis       | Allegheny    | 8/1/2016  | 500.00  | 7,000,000.00  | \$12,500.00 |
| Jeff Zail Consultants, Inc.                             | 19146 | Philadelphia     | Philadelphia | 5/1/2015  | 4100.00 | 6,200.00      | \$2,000.00  |
| JNA Marketing, Inc.                                     | 19102 | Philadelphia     | Philadelphia | 11/1/2015 | 2600.00 | 1,000,000.00  | \$6,500.00  |
| John Robert Powers Modeling, Charm and Finishing School | 18702 | Wilkes-Barre     | Luzerne      | 10/1/2016 | 1000.00 | 171,617.00    | \$3,000.00  |
| Jolie Health and Beauty Academy                         | 15056 | Leetsdale        | Allegheny    | 2/1/2015  | 500.00  | 108,000.00    | \$2,800.00  |
| Jolie Health and Beauty Academy                         | 16417 | Girard           | Erie         | 8/1/2016  | 2600.00 | 240,603.00    | \$3,500.00  |
| Journey Cartage Co., LLC                                | 16001 | Butler           | Butler       | 2/1/2016  | 2200.00 | 2,293.00      | \$1,000.00  |
| Just for Paws Academy of Pet Styling                    | 17815 | Bloomsburg       | Columbia     | 8/1/2016  | 3500.00 | 31,418.00     | \$2,500.00  |
| Keystone Diesel Institute                               | 17112 | Harrisburg       | Columbia     | 7/1/2015  | 4400.00 | 709,262.00    | \$5,500.00  |
| Keystone School (The)                                   | 17584 | Willow Grove     | Dauphin      | 11/1/2016 | 4400.00 | 22,500,000.00 | \$28,000.00 |
| Keystone Technical Institute                            | 17602 | Lancaster        | Lancaster    | 3/1/2016  | 3000.00 | 5,500,000.00  | \$11,000.00 |
| Lancaster County Career and Technology Center           | 17603 | Lancaster        | Lancaster    | 2/1/2016  | 3000.00 | 278,920.00    | \$4,000.00  |
| Lancaster School of Cosmetology                         | 19454 | North Wales      | Lancaster    | 11/1/2015 | 2600.00 | 256,000.00    | \$4,000.00  |
| Lancaster School of Massage                             | 15401 | Uniontown        | Montgomery   | 7/1/2016  | 4400.00 | 216,169.00    | \$3,500.00  |
| Lansdale School of Business                             | 15931 | Ebensburg        | Fayette      | 11/1/2016 | 4400.00 | 4,500,000.00  | \$10,000.00 |
| Laurel Business Institute                               | 16335 | Meadville        | Cambria      | 5/1/2016  | 2300.00 | 4,500,000.00  | \$10,000.00 |
| Laurel Highlands Therapeutic Academy                    | 16146 | Sharon           | Crawford     | 12/1/2016 | 4100.00 | 119,700.00    | \$2,800.00  |
| Laurel Technical Institute - Meadville                  | 16066 | Wexford          | Allegheny    | 7/1/2016  | 4400.00 | 1,000,000.00  | \$6,500.00  |
| Laurel Technical Institute - Sharon                     | 16346 | Seneca           | Vanango      | 3/1/2016  | 500.00  | 2,500,000.00  | \$8,000.00  |
| Laurel Technical Institute - Wexford                    | 17046 | Lebanon          | Lebanon      | 11/1/2016 | 3000.00 | 150,000.00    | \$2,800.00  |
| Learning Center (The)                                   | 18052 | Whitehall        | Lehigh       | 8/1/2016  | 2600.00 | 0.00          | \$1,000.00  |
| Lebanon County Career School, Inc.                      | 06088 | Windsor          | Out-of-State | 5/1/2015  | 3000.00 | 475,854.00    | \$5,000.00  |
| Lehigh Valley School of Dental Assisting                | 07083 | Union            | Out-of-State | 11/1/2015 | 2600.00 | 232,409.00    | \$3,500.00  |
| Lincoln Technical Institute - East Windsor              | 18104 | Allentown        | Lehigh       | 11/1/2015 | 4400.00 | 491,948.00    | \$5,000.00  |
| Lincoln Technical Institute - Hartford                  | 19116 | Philadelphia     | Philadelphia | 4/1/2016  | 4400.00 | 238,163.00    | \$3,500.00  |
| Lincoln Technical Institute of Union                    | 19104 | Philadelphia     | Philadelphia | 7/1/2016  | 2600.00 | 106,339.00    | \$2,800.00  |
| Lincoln Technical Institute/Hornig                      | 19136 | Philadelphia     | Philadelphia | 11/1/2015 | 4400.00 | 8,000,000.00  | \$13,500.00 |
| Lincoln Technical Institute/Market                      | 18017 | Bethlehem        | Northampton  | 11/1/2015 | 500.00  | 5,000,000.00  | \$10,500.00 |
| Lincoln Technical Institute/Philadelphia                | 19127 | Philadelphia     | Philadelphia | 8/1/2017  | 1000.00 | 7,500,000.00  | \$13,000.00 |
| Lion Investigation Academy                              | 18360 | Stroudsburg      | Monroe       | 5/1/2016  | 3000.00 | 1,908.00      | \$1,000.00  |
| Made Institute  | 19611 | Reading          | Berks        | 8/1/2016  | 2200.00 | 6,800.00      | \$2,000.00  |
| Main Line Center for Bartending                         | 18109 | Allentown        | Lehigh       | 2/1/2016  | 4400.00 | 331,659.00    | \$4,500.00  |
| Massage Academy of the Poconos                          | 18202 | Hazleton         | Lackawanna   | 6/1/2016  | 2200.00 | 26,785.00     | \$4,500.00  |
| Maurice & Lambert Training Center, LLC                  | 17901 | Sunbury          | Union        | 8/1/2016  | 4400.00 | 18,690.00     | \$2,500.00  |
| McCann School of Business and Technology Allentown      | 17901 | Pottsville       | Schuylkill   | 2/1/2016  | 4400.00 | 3,500,000.00  | \$9,000.00  |
| McCann School of Business and Technology Hazleton       | 18702 | Wilkes-Barre     | Luzerne      | 3/1/2016  | 4400.00 | 5,000,000.00  | \$10,500.00 |
| McCann School of Business and Technology Lewisburg      | 18020 | Bethlehem        | Northampton  | 7/1/2016  | 4400.00 | 7,500,000.00  | \$13,000.00 |
| McCann School of Business and Technology Pottsville     | 18106 | Allentown        | Lehigh       | 5/1/2015  | 2200.00 | 4,500,000.00  | \$10,000.00 |
| McCann School of Business and Technology Wilkes Barre   | 19008 | Broomall         | Delaware     | 8/1/2015  | 2600.00 | 5,000,000.00  | \$10,500.00 |
| Medical Careers Institute at Coordinated Health         | 23837 | Orlando          | Out-of-State | 10/1/2016 | 3500.00 | 18,055.00     | \$2,500.00  |
| Metro Beauty Academy                                    |       |                  |              |           |         | 212,472.00    | \$3,500.00  |
| Mixology Masters  |       |                  |              |           |         | 7,400.00      | \$2,000.00  |
| Montessori Teacher Training of Philadelphia             |       |                  |              |           |         | 3,500.00      | \$1,000.00  |
| Motorcycle & Marine Mechanics Institute                 |       |                  |              |           |         | 498,000.00    | \$5,000.00  |

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| Motorcycle Technology Center                               | 17406 | York           | York           | 5/1/2016  | 4100.00 | 1,500,000.00  | \$7,000.00  |
| NASCAR Technical Institute                                 | 28117 | Mooresville    | Out-of-State   | 10/1/2016 | 3000.00 | 258,000.00    | \$4,000.00  |
| National Personal Training Institute                       | 19114 | Philadelphia   | Philadelphia   | 11/1/2015 | 3000.00 | 449,449.00    | \$5,000.00  |
| National Personal Training Institute of Pittsburgh, Inc.   | 15206 | Pittsburgh     | Allegheny      | 3/1/2016  | 2600.00 | 219,550.00    | \$3,500.00  |
| Nelson's School of Heavy Equipment                         | 16441 | Waterford      | Erie           |           | 2200.00 | 6,800.00      | \$2,000.00  |
| New Castle School of Trades                                | 16143 | Pulaski        | Lawrence       | 7/1/2015  | 4400.00 | 8,500,000.00  | \$14,000.00 |
| New Century Careers  | 15219 | Pittsburgh     | Allegheny      | 11/1/2016 | 500.00  | 10,000.00     | \$2,500.00  |
| New Horizons Computer Learning Center Institute            | 15220 | Pittsburgh     | Allegheny      | 8/1/2015  | 2600.00 | 125,000.00    | \$2,800.00  |
| New Horizons Computer Learning Center of Allentown         | 18017 | Bethlehem      | Lehigh         | 2/1/2015  | 3000.00 | 279,000.00    | \$4,000.00  |
| New Horizons Computer Learning Center of Reading           | 19604 | Reading        | Northampton    | 7/1/2016  | 2200.00 | 10,000.00     | \$2,500.00  |
| New Horizons Computer Learning Centers of Wilkes-Barre/Scr | 18706 | Pittston       | Luzerne        | 4/1/2015  | 2600.00 | 130,000.00    | \$2,800.00  |
| New Horizons Learning Institute of Pennsylvania            | 17055 | Mechanicsburg  | Cumberland     | 8/1/2016  | 3500.00 | 487,000.00    | \$5,000.00  |
| New World Business School                                  | 19152 | Philadelphia   | Philadelphia   | 10/1/2015 | 2200.00 | 10,000.00     | \$2,500.00  |
| New York Code and Design Academy                           | 19119 | Philadelphia   | Philadelphia   | 8/1/2017  | 1000.00 | 50,000.00     | \$2,700.00  |
| NewCourtland Education Center                              | 16508 | Erie           | Philadelphia   | 11/1/2016 | 500.00  | 10,000.00     | \$2,500.00  |
| Northwest Regional Technology Center                       | 15541 | Stoystown      | Erie           | 8/1/2016  | 2600.00 | 300,000.00    | \$4,500.00  |
| Northwood Institute of Taxidermy, Inc.                     | 18202 | West Hazelton  | Somerset       | 2/1/2016  | 2300.00 | 145,000.00    | \$2,800.00  |
| NSB Trainers   | 19023 | Darby          | Luzerne        | 11/1/2015 | 2600.00 | 50,000        | \$2,700.00  |
| Olaus Institute  | 19114 | Philadelphia   | Delaware       | 7/1/2015  | 4400.00 | 154,000.00    | \$3,000.00  |
| Orleans Technical Institute/Red Lion Road                  | 15227 | Pittsburgh     | Philadelphia   | 5/1/2016  | 2300.00 | 7,500,000.00  | \$13,000.00 |
| Pampered Pet School of Dog Grooming                        | 19046 | Abington       | Allegheny      | 5/1/2015  | 2200.00 | 10,000.00     | \$2,500.00  |
| Penn Asian Vocational Institute                            | 15301 | Washington     | Montgomery     | 11/1/2015 | 4400.00 | 4,500,000.00  | \$10,000.00 |
| Penn Commercial, Inc.                                      | 18515 | Scranton       | Washington     | 3/1/2015  | 4400.00 | 46,000,000.00 | \$35,000.00 |
| Penn Foster  | 19007 | Bristol        | Lackawanna     | 11/1/2016 | 1000.00 | 50,000.00     | \$2,700.00  |
| Penn View Bible Institute                                  | 15701 | Indiana        | Snyder         | 7/1/2015  | 4400.00 | 4,500,000.00  | \$10,000.00 |
| Pennco Tech  | 15202 | Pittsburgh     | Bucks          | 5/1/2016  | 2300.00 | 50,000        | \$2,700.00  |
| Pennsylvania Academy of Pet Grooming                       | 15465 | Mount Braddock | Indiana        | 7/1/2015  | 4100.00 | 1,500,000.00  | \$7,000.00  |
| Pennsylvania Gunsmith School, Inc.                         | 18951 | Quakertown     | Allegheny      | 3/1/2016  | 4100.00 | 1,500,000.00  | \$7,000.00  |
| Pennsylvania Institute of Health and Technology            | 15931 | Ebensburg      | Fayette        | 5/1/2016  | 2600.00 | 150,000.00    | \$3,000.00  |
| Pennsylvania Institute of Massage Therapy                  | 19119 | Philadelphia   | Bucks          |           | 3000.00 | 300,000.00    | \$4,500.00  |
| Pennsylvania Institute of Taxidermy                        | 19104 | Philadelphia   | Cambria        | 4/1/2016  | 2200.00 | 10,000.00     | \$2,500.00  |
| People Technical School, Inc.                              | 19102 | Philadelphia   | Chester        |           | 2300.00 | 10,000.00     | \$2,500.00  |
| Philadelphia Aide Training School                          | 19138 | Philadelphia   | Philadelphia   | 7/1/2015  | 2600.00 | 150,000.00    | \$3,000.00  |
| Philadelphia Eiwyn Institute                               | 16801 | Lamont         | Philadelphia   | 5/1/2016  | 2200.00 | 10,000.00     | \$2,500.00  |
| Philadelphia School of Massage and Bodywork, Inc.          | 15217 | Pittsburgh     | Philadelphia   | 12/1/2016 | 3000.00 | 286,000.00    | \$4,000.00  |
| Philadelphia Technical Training                            | 29234 | Philadelphia   | Centre         | 10/1/2016 | 2400.00 | 20,000        | \$2,500.00  |
| Phlebotomy Institute of Central PA                         | 19038 | Glenside       | Allegheny      | 7/1/2015  | 2600.00 | 168,000.00    | \$3,000.00  |
| Pig Iron School for Advanced Performance Training          | 15213 | Pittsburgh     | Philadelphia   | 4/1/2016  | 3000.00 | 276,000.00    | \$4,000.00  |
| PITC Institute   | 15206 | Pittsburgh     | Montgomery     | 8/1/2015  | 4400.00 | 4,500,000.00  | \$10,000.00 |
| Pittsburgh Career Institute                                | 15235 | Pittsburgh     | Allegheny      | 7/1/2015  | 3500.00 | 460,000.00    | \$5,000.00  |
| Pittsburgh Filmmakers, Inc.                                | 16335 | Meadville      | Allegheny      | 11/1/2015 | 3000.00 | 257,000.00    | \$4,000.00  |
| Pittsburgh Institute of Aeronautics                        | 15206 | Pittsburgh     | Allegheny      | 7/1/2015  | 4400.00 | 11,000,000.00 | \$16,500.00 |
| Pittsburgh Institute of Mortuary Science Inc               | 15235 | Pittsburgh     | Allegheny      | 7/1/2015  | 4400.00 | 4,500,000.00  | \$10,000.00 |
| Pittsburgh School of Massage Therapy                       | 19152 | Philadelphia   | Allegheny      | 2/1/2015  | 3500.00 | 480,000.00    | \$5,000.00  |
| Precision Manufacturing Institute                          | 19124 | Philadelphia   | Crawford       | 8/1/2016  | 3500.00 | 500,000.00    | \$5,500.00  |
| Prism Career Institute                                     | 17847 | Milton         | Philadelphia   | 10/1/2015 | 500.00  | 50,000.00     | \$2,700.00  |
| Prism Health Aide Training, Inc.                           |       |                | Philadelphia   | 1/1/2016  | 3000.00 | 300,000.00    | \$4,500.00  |
| Professional Drivers Academy                               |       |                | Northumberland | 7/1/2016  | 2600.00 | 154,000.00    | \$3,000.00  |

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| Professional Healthcare Institute                           | 19027 | Melrose Park    | Montgomery     |           | 500.00  |               |  |  |  |             |
| Rapha School (The)  | 15747 | Home            | Indiana        | 2/1/2016  | 1000.00 | 10,000.00     |  |  |  | \$1,000.00  |
| RCS/AMS Race Car Service/Automotive Machinist School, Inc   | 15234 | Pittsburgh      | Allegheny      | 5/1/2016  | 500.00  | 0.00          |  |  |  | \$2,500.00  |
| Revolutionary Education Center                              | 18103 | Allentown       | Lehigh         |           | 2600.00 | 154,000.00    |  |  |  | \$1,000.00  |
| Revolutionary Education Center                              | 18447 | Olyphant        | Lackawanna     | 3/1/2015  | 2600.00 | 172,000.00    |  |  |  | \$3,000.00  |
| Roadmaster Drivers School                                   | 18020 | Bethlehem       | Northampton    | 12/1/2015 | 500.00  | 10,000.00     |  |  |  | \$3,000.00  |
| Romulus Enterprises, LLC                                    | 19102 | Philadelphia    | Philadelphia   | 12/1/2016 | 500.00  | 0.00          |  |  |  | \$2,500.00  |
| Rosedale Technical Institute                                | 15205 | Pittsburgh      | Allegheny      | 11/1/2015 | 4400.00 | 7,500,000.00  |  |  |  | \$1,000.00  |
| School of Body Therapies                                    | 19047 | Pittsburgh      | Bucks          | 5/1/2016  | 2600.00 | 164,000.00    |  |  |  | \$13,000.00 |
| School of Discipleship                                      | 16436 | Spring Creek    | Warren         | 10/1/2015 | 2300.00 | 20,000        |  |  |  | \$3,000.00  |
| Shale Energy Institute                                      | 15314 | Bentleyville    | Washington     | 12/1/2016 | 3000.00 | 300,000.00    |  |  |  | \$2,500.00  |
| Shelly Truck Driving School                                 | 17403 | York            | York           | 8/1/2015  | 2200.00 | 10,000.00     |  |  |  | \$4,500.00  |
| Sight & Sound Conservatory                                  | 17579 | Strasburg       | Lancaster      | 3/1/2015  | 2300.00 | 50,000        |  |  |  | \$2,500.00  |
| SmileSystem School of Dental Assisting                      | 19046 | Rockledge       | Montgomery     | 6/1/2015  | 2200.00 | 10,000.00     |  |  |  | \$2,700.00  |
| Smith & Solomon Training School                             | 19401 | Norristown      | Montgomery     | 8/1/2015  | 3500.00 | 500,000.00    |  |  |  | \$2,500.00  |
| South Hills Sch of Bus Tech/SC                              | 16801 | State College   | Centre         | 11/1/2015 | 4400.00 | 11,500,000.00 |  |  |  | \$5,500.00  |
| South Hills School of Business and Technology               | 17044 | Lewistown       | Mifflin        | 8/1/2016  | 4100.00 | 1,500,000.00  |  |  |  | \$17,000.00 |
| South Hills School of Business and Technology - Altoona Cam | 16602 | Altoona         | Blair          | 7/1/2016  | 4100.00 | 1,500,000.00  |  |  |  | \$7,000.00  |
| Springhouse Computer School                                 | 19341 | Exton           | Chester        | 10/1/2015 | 500.00  | 50,000.00     |  |  |  | \$7,000.00  |
| Star Career Academy   | 19403 | Audobon         | Montgomery     |           | 4400.00 | 350,000.00    |  |  |  | \$2,700.00  |
| Steamfitter Local Union 420 Training Center                 |       |                 | Philadelphia   | 3/1/2017  | 500.00  | 0.00          |  |  |  | \$4,500.00  |
| Studio Incamminati, School for Contemporary Realist Art     | 19107 | Philadelphia    | Philadelphia   | 12/1/2015 | 3500.00 | 500,000.00    |  |  |  | \$1,000.00  |
| Suburban Academy of Law Enforcement, Inc.                   | 15146 | Monroeville     | Allegheny      | 7/1/2015  | 2300.00 | 50,000        |  |  |  | \$5,500.00  |
| Successful Aging Career Institute                           | 19082 | Upper Darby     | Delaware       | 9/1/2016  | 3000.00 | 326,701.00    |  |  |  | \$2,700.00  |
| System One Technical Training Center                        | 15024 | Cheswick        | Allegheny      | 5/1/2016  | 500.00  | 10,000.00     |  |  |  | \$4,500.00  |
| TDDS Inc  | 44412 | Diamond         | Out-of-State   | 3/1/2016  | 2200.00 | 10,000.00     |  |  |  | \$2,500.00  |
| Torchiana Automotive - Training Division                    | 19382 | West Chester    | Chester        | 2/1/2015  | 2300.00 | 50,000        |  |  |  | \$2,700.00  |
| Training Camp (The)   | 18324 | Bushkill        | Monroe         | 2/1/2015  | 3000.00 | 300,000.00    |  |  |  | \$4,500.00  |
| Trans American Technical Institute, Inc.                    | 18433 | Jermyn          | Lackawanna     | 2/1/2016  | 3500.00 | 500,000.00    |  |  |  | \$5,500.00  |
| Triangle Tech - Bethlehem                                   | 18017 | Bethlehem       | Northampton    | 7/1/2016  | 4400.00 | 4,500,000.00  |  |  |  | \$10,000.00 |
| Triangle Tech, Inc./DuBois                                  | 15801 | DuBois          | Clearfield     | 7/1/2015  | 4400.00 | 4,500,000.00  |  |  |  | \$10,000.00 |
| Triangle Tech, Inc./Erie                                    | 16502 | Erie            | Erie           | 7/1/2015  | 4100.00 | 1,500,000.00  |  |  |  | \$7,000.00  |
| Triangle Tech, Inc./Greensburg                              | 15601 | Greensburg      | Westmoreland   | 7/1/2015  | 4400.00 | 4,500,000.00  |  |  |  | \$10,000.00 |
| Triangle Tech, Inc./Pittsburgh                              | 15214 | Pittsburgh      | Allegheny      | 7/1/2015  | 4400.00 | 8,000,000.00  |  |  |  | \$13,500.00 |
| Triangle Tech, Inc./Sunbury                                 | 17801 | Sunbury         | Northumberland | 8/1/2015  | 4400.00 | 4,500,000.00  |  |  |  | \$10,000.00 |
| Universal Technical Institute                               | 19341 | Exton           | Chester        | 7/1/2015  | 4400.00 | 33,500,000.00 |  |  |  | \$35,000.00 |
| Universal Technical Institute                               | 77073 | Glendale Height | Out-of-State   | 12/1/2016 | 500.00  | 10,000.00     |  |  |  | \$2,500.00  |
| Universal Technical Institute                               | 60139 | Houston         | Out-of-State   | 10/1/2016 | 2600.00 | 180,000.00    |  |  |  | \$3,000.00  |
| Valley Forge School of Dental Assisting                     | 19460 | Phoenixville    | Chester        | 8/1/2015  | 2000.00 | 2,655.00      |  |  |  | \$1,000.00  |
| Valley School of Healing Arts (The)                         | 17864 | Port Trevorton  | Snyder         | 2/1/2016  | 2200.00 | 10,000.00     |  |  |  | \$2,500.00  |
| Vet Tech Institute  | 15222 | Pittsburgh      | Allegheny      | 3/1/2015  | 4400.00 | 11,500,000.00 |  |  |  | \$17,000.00 |
| VICA Technologies, LLC                                      | 19104 | Philadelphia    | Philadelphia   | 4/1/2015  | 500.00  | 0.00          |  |  |  | \$1,000.00  |
| Victory Tech  |       |                 | Allegheny      | 8/1/2015  | 500.00  | 0.00          |  |  |  | \$1,000.00  |
| Weider Training and Testing Institute                       | 18109 | Allentown       | Lehigh         | 7/1/2016  | 3500.00 | 500,000.00    |  |  |  | \$5,500.00  |
| Western Pennsylvania School of Taxidermy                    | 15764 | Oliveburg       | Jefferson      | 10/1/2016 | 2600.00 | 165,000.00    |  |  |  | \$3,000.00  |
| Workforce Institute's City College (The)                    | 19110 | Philadelphia    | Philadelphia   | 5/1/2015  | 4100.00 | 1,500,000.00  |  |  |  | \$7,000.00  |
| Wrightco Technologies Technical Training Institute          | 15931 | Ebensburg       | Cambria        | 12/1/2015 | 500.00  | 0.00          |  |  |  | \$1,000.00  |
| Wyoming Technical Institute                                 | 15717 | Blairsville     | Indiana        | 9/1/2016  | 4400.00 | 5,500,000.00  |  |  |  | \$11,000.00 |
| York Technical Institute/Lancaster                          | 17601 | Lancaster       | Lancaster      | 10/1/2016 | 4400.00 | 19,500,000.00 |  |  |  | \$25,000.00 |

York Time Institute  
YTI Altoona  
YTI Career Institute - York

17401 York  
16602 Altoona  
17402 York

York  
Blair  
York

8/1/2015  
3/1/2015  
7/1/2015

2200.00  
4400.00  
4400.00

10,000.00  
39,500,000.00  
18,500,000.00

\$2,500.00  
\$35,000.00  
\$24,000.00





COMMONWEALTH OF PENNSYLVANIA  
GOVERNOR'S OFFICE OF GENERAL COUNSEL

September 7, 2016

Mr. David Sumner  
Executive Director  
Independent Regulatory Review Commission  
14<sup>th</sup> Floor, 333 Market Street  
Harrisburg, PA 17126

Dear Mr. Sumner:

Enclosed is a copy of a final regulation approved by the Department of Education (22 Pa. Code, Chapter 73, State Board of Private Licensed Schools – Fees, #006-334), for review and action by the Commission pursuant to the provisions of section 5.1(c) of the Regulatory Review Act.

The Department of Education will provide your Committee with any assistance you may require to facilitate a thorough review of this final regulation.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ernest N. Helling".

Ernest N. Helling  
Assistant Chief Counsel

Enclosure

cc: Wil Del Pilar, Deputy Secretary  
Karen Molchanow, State Board of Education, Executive Director  
Marisa Lehr, Esquire  
Angela Fitterer, Legislative Liaison

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

**I.D. NUMBER:** 006-334  
**SUBJECT:** General Provisions; Fees  
**AGENCY:** DEPARTMENT OF EDUCATION  
 State Board of Private Licensed Schools

**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 Disapproved Regulation
  - a. With Revisions
  - b. Without Revisions

2016 SEP -7 11:10:40

RECEIVED  
IPRC

**FILING OF REGULATION**

| <u>DATE</u> | <u>SIGNATURE</u> | <u>DESIGNATION</u>   |
|-------------|------------------|--|
| 9-7-16      | Cheryl A. Walker | EDUCATION CE<br>HOUSE COMMITTEE ON <del>PROFESSIONAL LICENSURE</del><br>MAJORITY CHAIR Stan Saylor                                   |
| 9-7-16      | April McClellan  | MINORITY CHAIR James Roebuck, Jr.<br>EDUCATION CE<br>SENATE COMMITTEE ON <del>CONSUMER PROTECTION &amp; PROFESSIONAL LICENSURE</del> |
| 9/7/16      | Judy Merrill     | MAJORITY CHAIR Lloyd Smucker   |
| 9/7/16      | AM               | MINORITY CHAIR Andrew Dinniman   |
| 9/7/16      | K Cooper         | INDEPENDENT REGULATORY REVIEW COMMISSION   |
| -----       | -----            | ATTORNEY GENERAL (for Final Omitted only)  |
| -----       | -----            | LEGISLATIVE REFERENCE BUREAU (for Proposed only)   |