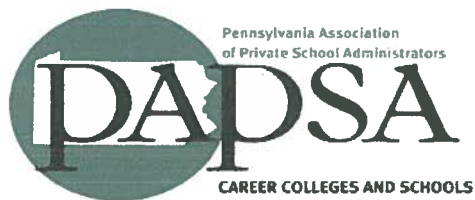


# 3145



April 11, 2016

Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

2016 APR 13 PM 1:57

RECEIVED  
IRRC

To whom it may concern:

The Pennsylvania Association of Private School Administrators (PAPSA) is the statewide association that represents approximately 150 private career and technical colleges and other specialized higher education institutions across Pennsylvania. These institutions are typically licensed through the Pennsylvania Private Licensed Schools (PLS) Board.

The PLS Board recently published Regulation #6-334 (IRRC #3145), which proposes changes to Title 22, Chapter 73, primarily to increase the fee schedules charged to institutions licensed by the PLS for a variety of applications and services. This letter should serve as some general comments from PAPSA on this regulatory change and proposed fee increase.

When the fee increase proposals were first introduced in early 2015, the PLS provided several credible justifications for the need to increase fees, including but not limited to; fees have not been increased in over a decade, the shifting of some staffing costs previously paid by the PA Department of Education to be now paid by the PLS instead, a recent decline in school applications that decreased revenue coming into PLS over the last few years, along with several other reasons.

PAPSA did provide copies of the original draft fee increase proposals to all of our member institutions in early 2015 and we requested feedback from our members on these proposals at that time. As a result of the feedback we received, PAPSA worked with the PLS Board, its staff, and some legislative offices to consider changes to the fee increase package originally proposed. As a result of these discussions, the PLS made modifications to its initial fee proposals, including some reductions in the rate of increase on existing schools. These efforts by the PLS to reduce the fee amounts is appreciated by PAPSA.

PAPSA has always maintained a positive professional working relationship with the PLS and we appreciate the hard work of their board members and staff to assure quality postsecondary career and technical education in Pennsylvania continues to thrive. Although fee increases may not be supported by every school licensed by the PLS, most of the institutions PAPSA has heard from understand the need for some increase to help ensure the board has the revenue to continue its work.

In closing, assuming the current fee increase is implemented after regulatory approvals are received, PAPSA would respectfully ask the PLS, the PA Department of Education, and the General Assembly to review potential cost-savings to avoid the need for additional fee increases in the long-run. Thank you for your consideration of this request.

Sincerely,

A handwritten signature in black ink, appearing to read 'Aaron M. Shenck', with a long horizontal flourish extending to the right.

Aaron M. Shenck  
Executive Director - PAPSA

Cc: Chairman Stan Saylor, House Education Committee  
Chairman James Roebuck, House Education Committee  
Chairman Lloyd Smucker, Senate Education Committee  
Chairman Andrew Dinniman, Senate Education Committee