



Association of
Independent Colleges & Universities
of Pennsylvania

101 North Front Street • Harrisburg, Pennsylvania 17101-1405

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March 31, 2017

Pennsylvania Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, Pennsylvania 17101

On behalf of the 89 private college and university members of the Association of Independent Colleges and Universities of Pennsylvania (AICUP), I am writing in support of the final omitted regulation submitted by the Pennsylvania Department of Education on *Postsecondary Distance Education Reciprocity #6-337* (IRRC# 3168). This regulation is to be considered by the Commission during your public meeting of May 18, 2017.

The regulation establishes procedures and fees to support the administration of Pennsylvania's participation in the national State Authorization Reciprocity Agreement (SARA). Participation in SARA will lessen the regulatory burden and reduce costs for colleges and universities throughout Pennsylvania, both public and private, that enroll out-of-state students in distance education programs. Currently 47 other states have joined SARA and Pennsylvania's colleges and universities will be at a competitive disadvantage should the Commonwealth be unable to continue participation in the Agreement. It is important to note that the regulation will only affect those higher education institutions in Pennsylvania that voluntarily choose to participate in SARA – non-participants in SARA will not be bound by the regulation.

AICUP, along with representatives of the other higher education sectors in Pennsylvania, has reviewed drafts of this regulation and has provided comments to the Department of Education on the content of this regulation. I ask the Commission for an affirmative vote on the regulation when it is considered during your meeting. Please contact me if you require any additional information.

Sincerely,

Don L. Francis

Don L. Francis
President

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