COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF EDUCATION
May 12, 2011

SUBECT: Private Licensed Schools Memorandum #73

TO: Chief Executive Officers/Directors
Licensed/Registered Private Schools

FROM: Patricia Landis, Chief
Division of Private Licensed Schools

APPLICATION QUALITY AND DEADLINES

After the February 2011 Board meeting, the Chairman of the Board wrote a memo to all private licensed schools expressing the need to clarify the responsibilities of the schools, staff, and the Board, in terms of the quality of applications submitted for new school licenses and/or program approvals. By quality, we mean both the accuracy of the documents and completeness of the application package. This is a matter of concern to the Board because the quality of the documents submitted to the Board has eroded over time to such an extent that staff and Board members oftentimes become the de-facto proof readers and editors of applications. This is an unreasonable use of both staff and Board member time and effort and the Board seeks to reverse this trend. In a related vein, there has been a sharp increase in programs being given "approved pending" status, and programs have been approved under the "approved pending" designation with many required components missing or a large number of errors (both grammatical and substantive) which need to be corrected. Upon careful reflection the Board has determined to significantly reduce the number of applications given this designation.

The Board has concluded that the responsibility for the quality, completeness and accuracy of an application lies solely with the school. The role of staff, and their only role by statute and regulation, is to advise schools about the application process and to ensure the applications are complete, (i.e. all material requirements are met). Staff does not have the responsibility or authority to make judgments on the quality of the contents, nor should they be proof-reading applications. It is the role of the Board members to make judgments on quality, as well as to determine if the school has made a solid case for approval and can defend the application. Previously, staff issued a "cure" letter in an attempt to address issues of quality as well as omissions. That will no longer be the case. Future letters will address only the completeness of the application. Applications missing major components or missing numerous requirements will be returned for resubmission for the subsequent Board meeting. It becomes imperative, therefore, that schools take the time and make the effort to ensure that applications are accurate, complete, and make a solid case for approval.

The Board has the authority and responsibility to vote to approve, approve pending, defer, or deny applications. While the Board will continue to use the approved pending designation, when a few minor revisions are needed, applications with serious deficiencies or large numbers of deficiencies/errors will be deferred or denied. When an application is deferred, the school must make the required revisions and defend the application before a subsequent meeting of the Board. When an application is denied, the Board will not reconsider the current application.

An applicant that faces denial is not restricted from submitting a new application after attending another seminar and paying the application fees for a new application.

Submission deadlines will continue to be strictly enforced. All applications must be received in the Division office by the published deadline. Application fees must also be received by the published deadline. If the fee is late, the application will not be processed until after the next submission deadline.