



MEMO

TO: Training providers authorized to operate under the State Board of Private Licensed Schools
FROM: Nicole Campbell, Chief, Division of Postsecondary Proprietary Training
DATE: November 14, 2024
RE: Private Licensed Schools Policy Memorandum #75 (revised 11.14.2024)

Financial Transparency and Accountability

This memo revises and replaces Board Policy Memorandum #75, issued on November 16, 2023, and Board Policy Memorandum #51 issued December 30, 1996.

The State Board of Private Licensed Schools, at the meeting held on November 14, 2024, approved the following policy under the authority of 24 P.S. §6504 (a).

This memo includes requirements imposed as of July 17, 2024, in accordance with Act 69 of 2024 (Act) regarding student fee transparency (24 P.S. § 2004-H), higher education cost transparency (24 P.S. § 2005-H), and exit counseling (24 P.S. § 2006-H). The Act applies to all Institutions of Higher Education (IHEs), including Private Licensed Schools (schools). 24 P.S. § 2001-H. The Act requires schools to present financial information in greater detail to students and to provide financial aid exit counseling at the end of a student's final academic term. Effective from the 2024-25 school year, all schools are responsible for the mandates of the Act to ensure higher education transparency and accountability.

We appreciate your assistance in complying with the laws and ensuring your students better understand the financial costs to attend your institution, their repayment obligations as they near graduation, and the available resources to assist them.

Tuition is the item charged to students for the educational services provided to an enrolled student.

Fees are the items charged to enrolled students for any additional services or items not included in the cost of tuition. Fees that are not required to complete the program, optional fees, must be disclosed as optional.

Cancellation of the enrollment agreement occurs prior to the student attending class or completing coursework. Schools may require students to provide a written notice of cancellation, when extended the additional time required to do so in accordance with 22 Pa. Code § 73.132.

Withdrawal/Termination of the enrollment agreement occurs after a student has attended class or completed coursework. Schools may not require students to provide notice of their withdrawal, in writing or otherwise.

Application/Registration Fee – these terms – and only these terms – may be used interchangeably or independently by a school, but in all instances the fees collected to apply, register, and/or enroll are totaled as one fee and are subject to 22 Pa. Code § 73.132.

Mandatory Fee A charge imposed by an institution of higher education to all of the institution's students, irrespective of their course or admission status, for enrollment or attendance for items not covered by tuition, room or board fees.

In accordance with 22 Pa. Code § 73.131:

- (1) Changes in tuition, fees and other costs under the school's control shall be reported to the Board before they become effective.
- (2) Changes in tuition, fees and costs under the school's control may not become effective for currently enrolled students unless students are notified of the change at least 60 calendar days prior to the effective date of the change.

In accordance with 22 Pa. Code § 73.132, a school may charge an application or a registration fee which may not exceed 15% of the amount of tuition or \$150, whichever is less.

- The application or registration fee is fully refundable if the student requests cancellation within 5 calendar days after signing the enrollment agreement or if the alternative set forth in § 73.121 (relating to general requirement for a written agreement) is used, 5 calendar days after submitting the application, if no classes have been attended, lessons completed, or materials used.
- A request for cancellation which is not made in writing shall be confirmed in writing by the student within an additional period of 5 calendar days. The school may retain all the fee after 5 calendar days or after 10 calendar days absent written confirmation, where required.
- In accordance with 22 Pa. Code § 73.122 (14) the enrollment agreement shall state that it is not binding until it is accepted by a representative of the school, or, if appropriate, in the headquarters of the school group. The period to request cancellation begins once the enrollment agreement is signed by both the student and the school – this is the effective date of the enrollment agreement.

Student Fee Transparency (24 P.S. § 2004-H)

Display - Effective Immediately

- All schools must post online, as well as prominently display on-site, every mandatory fee – including a description of the fee – on all publicly accessible Internet websites and online student portals, in advance of the start of the academic term for which the fee will be charged by the school and included on a tuition bill.
- The amount of every mandatory fee must be accompanied by a description of:
 - (1) The general purpose of the mandatory fee.
 - (2) How the mandatory fee is expected to be allocated and used.
 - (3) How the mandatory fee will be collected and the academic year or semester for which the fee will be assessed.

Publication of Fees - Beginning November 15, 2025, and by November 15 of each year thereafter, all schools must post online on their publicly accessible Internet website the following information from the prior academic year:

- (1) The total amount of mandatory fees collected.
- (2) The amount of mandatory fees allocated to each use.

Linking - Beginning on June 30, 2026, and by June 30 of each year thereafter, all schools must provide the department with evidence that the mandated fee information is posted on the school's publicly accessible Internet website.

Accountability and Reporting - Beginning in January 2027, the Division of Higher Education, Access, and Equity will begin collecting the associated required reporting as part of the Higher Education Annual Institutional Reporting system.

Schools are permitted to adjust the cost of tuition. However, currently enrolled students who are impacted by the tuition change must be notified at least 60 calendar days in advance of the change.

In accordance with 22 Pa. Code § 73.173 (k) A school may not offer premiums, special endorsements, or discounts to prospective students. Therefore, if the school intends to adjust student costs, the only cost that may be advertised is the present cost as reported to the Board. The school may not advertise a past, future, or expiring cost.

Frequent tuition changes, as well as substantial increases or decreases in tuition costs, will require the school to submit a written narrative detailing the school's rationale for the request. If the rationale is not accepted by Board staff, the request may be presented to the Board for consideration.

Tuition Variations for a specific Board-approved program

Schools are permitted to adjust the cost of tuition. However, schools that wish to charge varying amounts for a specific approved program must be able to financially justify the difference in tuition amounts. For differing tuition amounts to be considered, there must be no difference in the quality of training provided or the quality of the facility or space being utilized and must achieve the same program outcomes.

Schools requesting approval to offer differing tuition amounts for a specific program will need to submit a written narrative detailing the school's rationale for the request. If the rationale is not accepted by Board staff, the request may be presented to the Board for consideration.

Tuition and Fees - Refunds

22 Pa. Code § 73.131 through § 73.137 specifies the requirements for refunds for cancellation or withdrawal/termination.

Application/Registration Fee

- Cancellation – the fee is fully refundable if the student requests cancellation within 5 calendar days after signing the enrollment agreement, providing the student has not attended class or completed any coursework. If the school requires written confirmation of cancellation, an additional 5 calendar days must be afforded for the student to submit the cancellation request in writing.
- Withdrawal/Termination – the fee may be retained by the school, as the student has already attended class or completed coursework.

Tuition

- Cancellation – any tuition paid prior to the start of class or prior to the completion of any coursework is fully refundable.
- Withdrawal/Termination – any tuition paid is subject to 22 Pa. Code § 73.131 through § 73.137, which specifies the requirements for calculating tuition refunds for withdrawal/termination.

Fees – Tangible (includes consumables, uniforms, books, toolkits, etc.)

- Cancellation – any fees paid for tangible items are to be refunded unless the tangible item has been used. Schools must also disclose any additional item condition expectations for the student to receive a refund.
- Withdrawal/Termination – any fees paid for tangible items are to be refunded unless the tangible item has been used. Schools must also disclose any additional item condition expectations for the student to receive a refund.

Fees – Intangible (includes graduation fees, software license fees, lab/shop fees, certification/exam fees, etc.)

- Cancellation – any fees paid for intangible items/services are to be refunded.

- Withdrawal/Termination – any fees paid for intangible items/services are to be refunded unless the item has been used by the student or the service has been received in full by the student. Fees for intangible items/services must be refunded according to the tuition refund policies under 22 Pa. Code § 73.131 through § 73.137. Fees collected by the school, which are to be paid to a third-party, must be fully refunded if the third-party service is not used by the student (includes CPR/BLS, certification/licensure exams, etc.).

Please obtain guidance from the school's assigned Board Administrator if there are any questions regarding the refunds to be issued for tangible and/or intangible items.

Higher Education Cost Transparency (24 P.S. § 2005-H)

Effective Immediately

All schools must provide prospective students with extensive cost and financial aid information as part of the admission or financial aid offer process.

(a) All schools must provide the following information to a prospective student as part of the students' offer of enrollment at the school or as part of the student's financial aid offer:

(1) An estimate of the total cost of attendance, including:

(i) Tuition for the student's first academic year.

(ii) A list of each fee charged to a student in the student's first academic year. The fees shall include both mandatory and optional fees.

(iii) A breakdown of all room and board options and the costs associated with each option for the student's first academic year.

(iv) Books and supplies.

(2) An estimate of the financial aid offered, as available, by the school, including, but not limited to:

(i) All grants or scholarships that do not require repayment.

(ii) Student loans that require repayment.

(iii) Student employment options.

(3) An estimate of the net cost that subtracts any scholarships or grants being offered from the estimated total cost of attendance.

(4) An estimate of the total cost of attendance for subsequent years. The estimate may be provided through easily accessible electronic means and shall include:

(i) Information regarding whether financial aid is being offered only for the upcoming academic year or if it is renewable for subsequent academic years. If financial aid is renewable for subsequent academic years, the information shall include any requirements that must be met for renewal of the financial aid.

(ii) A history of the previous academic year's tuition.

(iii) An estimate of the total tuition that the student will be charged in each academic year necessary for the student to receive a degree in the student's major.

(iv) An estimate of the total amount of fees charged to a student in each academic year necessary for the student to receive a degree in the student's major.

(b) Disclosure to prospective students. –All schools shall use easily understood terms and clearly identify each piece of financial aid that a student must repay.

(c) Public availability. --Each school shall make available on its publicly accessible Internet website an estimate of all tuition, fees, and room and board that may be charged in an academic year.

Accountability and Reporting - Beginning in January 2025, the Division of Higher Education, Access, and Equity will begin collecting an attestation of compliance for this requirement as part of the Higher Education Annual Institutional Reporting system.

Exit Counseling (24 P.S. § 2006-H)

Effective Immediately

All schools must provide financial aid exit counseling to students at the end of their final academic term, unless a student elects not to participate.

Federal Student Aid (FSA) Federal Loan Exit Counseling does not supplant this requirement.

A school may offer the counseling required under this section in person or virtually and may partner with the Pennsylvania Higher Education Assistance Agency or a similar entity to provide the required counseling.

Counseling for graduating students. --The financial aid exit counseling for a student who graduates at the end of the academic term shall, at a minimum, include:

- (1) A list of all available Federal and State programs, including, if available, related websites and contact information, that may assist with payments, reductions or forgiveness of the individual student loans.
- (2) All available repayment options on student loans known to the school and, if available, a link to an online student loan payment calculator.
- (3) Information on when a student's loan payments will begin and information on assistance with delaying repayment of loans.
- (4) Any other information that the school deems necessary to help an exiting student understand options relating to repaying student loans.

Counseling for students who transfer or withdraw. --With respect to a student who leaves a school without the knowledge of the school or transfers to another IHE, the school shall attempt to make financial aid counseling available to the student. If the school is unable to get in contact with the student, the school shall mail the information described in 'Counseling for graduating students' in writing to the student at the last known address on file.

Accountability and Reporting - Beginning in January 2025, the Division of Higher Education, Access, and Equity will begin collecting an attestation of compliance for this requirement as part of the Higher Education Annual Institutional Reporting system.

For additional guidance, please contact your school's assigned Board Administrator.