

WEST VIRGINIA
SECRETARY OF STATE
KEN HECHLER
ADMINISTRATIVE LAW DIVISION

Form #5

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JUL 13 4 23 PM '94

OFFICE OF WEST VIRGINIA
SECRETARY OF STATE

**NOTICE OF AGENCY ADOPTION OF A PROCEDURAL OR INTERPRETIVE RULE
OR A LEGISLATIVE RULE EXEMPT FROM LEGISLATIVE REVIEW**

AGENCY: West Virginia Board of Education TITLE NUMBER: 126

CITE AUTHORITY: W.Va. Constitution, Article XII, §2; W.Va. Code 18-2-5, 18A-4-8a

RULE TYPE: PROCEDURAL _____ INTERPRETIVE _____

EXEMPT LEGISLATIVE RULE X
CITE STATUTE(S) GRANTING EXEMPTION FROM LEGISLATIVE REVIEW

W.Va. Code §§29A-3B-1, et seq.; W.Va. Board of Education v. Hechler,
180 W.Va. 451, 376 S.E.2d 839 (1988)

AMENDMENT TO AN EXISTING RULE: YES _____, NO X

IF YES, SERIES NUMBER OF RULE BEING AMENDED: _____

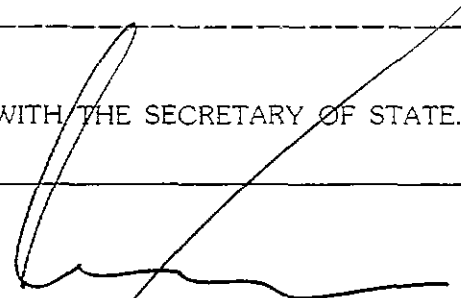
TITLE OF RULE BEING AMENDED: _____

IF NO, SERIES NUMBER OF NEW RULE BEING ADOPTED: 163 (Policy 5301)

TITLE OF RULE BEING ADOPTED: School Service Personnel Training

Comparable to Twelve (12) Semester Hours of College Credit

THE ABOVE RULE IS HEREBY ADOPTED AND FILED WITH THE SECRETARY OF STATE. THE
EFFECTIVE DATE OF THIS RULE IS Aug 15 1994.



William J. Luff, Jr.
Associate State Superintendent

6-60

FISCAL NOTE WORKSHEET

NO _____ DRAFT NO _____ BILL NO Policy 5301 RESOLUTION NO _____

SUBJECT Comparable Training to 12 College Hours: Service P FUND General

SOURCE OF REVENUE: GENERAL SPECIAL OTHER (SPECIFY) _____

COST ESTIMATE BASED ON: AN ORIGINAL ESTIMATE BUDGET BILL OTHER (SPECIFY) _____

INCOME ESTIMATE BASED ON: AN ORIGINAL ESTIMATE BUDGET BILL OTHER (SPECIFY) _____

SHOW OVER-ALL EFFECT IN ITEMS 1 AND 2 AND ITEM 3 GIVE EXPLANATION OF BREAKDOWN BY FISCAL YEAR INCLUDING LONG-RANGE EFFECT

EFFECT OF PROPOSAL	ANNUAL		FISCAL YEAR		
	INCREASE	DECREASE	CURRENT	NEXT	THEREAFTER
1. ESTIMATED TOTAL COST	\$	\$	\$	\$ 200,849	
PERSONAL SERVICES	\$	\$			
CURRENT EXPENSES					
REPAIRS AND ALTERATIONS					
EQUIPMENT					
OTHER					
2. ESTIMATED TOTAL REVENUES	\$	\$	\$	\$	\$

3. EXPLANATION OF ABOVE ESTIMATES (INCLUDING LONG-RANGE EFFECT):

Salary increase for service personnel with 12 college hours or comparable credit from a vocational or trade school. Assuming that 12% of 13,333.706 service personnel had 12 college hours of credit, the cost would be as follows:

Step 2 Service Personnel	\$162,394
Step 3 Fixed Charges	14,096
Retirement (15%)	<u>24,359</u>
	\$200,849

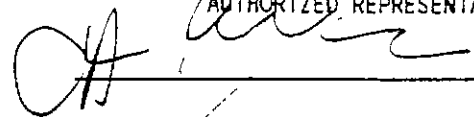
DATE

AGENCY

4/8/94

Department of Education

AUTHORIZED REPRESENTATIVE



EXECUTIVE SUMMARY
WEST VIRGINIA BOARD OF EDUCATION

POLICY NUMBER AND TITLE: Policy 5301 School Service Personnel Training
Comparable to Twelve (12) Semester Hours of
College Credit

PUBLIC COMMENT PERIOD ENDS: June 27, 1994 ADOPTED: July 8, 1994

BACKGROUND:

The 1994 Legislature enacted Code to provide an additional ten dollars (\$10) per month for school service personnel who have twelve (12) college hours or comparable credit from a trade or vocational school as approved by the State Board of Education.

PURPOSE:

Proposed Policy 5301 establishes the number of contact hours received from a state approved vocational or trade school which for pay purposes for service personnel is comparable to twelve (12) semester hours of college credit.

CONTENT:

For service personnel salary purposes only, twelve (12) semester hours of college credit is comparable to 180 contact hours of training from a state approved vocational or trade school.

IMPACT:

Assuming the first year that twelve percent of the school service personnel in West Virginia have twelve (12) semester hours of college credit, the cost would be an additional \$200,849. The policy will encourage all service personnel to pursue an education beyond high school resulting in a better educated work force.

Comments were received from twenty-eight people. Each comment was considered in finalizing the policy.

For Comment

Policy 5301: School Service Personnel Training Comparable to Twelve (12) Semester Hours of College Credit

The State Board of Education affirms its commitment to an educated work force in West Virginia public schools. Service personnel are a valuable asset to the educational staffing of a comprehensive educational program and a highly trained staff is an asset to a thorough and efficient system of education for all students. Therefore, all service personnel are encouraged to pursue an education beyond high school.

Policy adopted: July 8, 1994

FILED

JUL 13 4 23 PM '94

TITLE 126
LEGISLATIVE RULE
WEST VIRGINIA BOARD OF EDUCATION
CHAPTER 18A-4-8a
SERIES 163
(POLICY 5301)

OFFICE OF WEST VIRGINIA
SECRETARY OF STATE

TITLE: School Service Personnel Training Comparable to Twelve (12) Semester Hours of College Credit

Section 1. General.

1.1 Purpose - The purpose of this policy is to establish the number of contact hours received from a vocational or trade school which for pay purposes is comparable to twelve (12) semester hours of college credit.

1.2 Authority - The authority for this legislative rule is established in the West Virginia Constitution, Article XII, Section 2 and in West Virginia Code 18-2-5 and 18A-4-8a.

1.3 Filing Date -

1.4 Effective Date -

1.5 Repeal of Former Rule - None - This is a new policy.

Section 2. Applicability

This policy applies only to service personnel. The number of contact hours of training in a vocational or trade school comparable to twelve (12) semester hours of college credit is defined to give county boards of education direction in establishing each individual's service personnel salary schedule.

Section 3. Definition of Hours

Twelve semester hours of credit shall be defined to include any one or a combination of the following:

3.1 Twelve semester hours of credit from an accredited institution of higher education in course work relevant to a current or anticipated area of employment.

3.2 One hundred eighty (180) contact hours of training from an approved vocational or trade school in an area relevant to current or anticipated employment.

Section 4. Verification of Hours

4.1 Verification of credit will be an official transcript of course work completed from an approved institution of higher education or grade report of completed contact hours from a vocational and/or trade school approved by the State Board of Education, Board of Directors of State College System and/or Bureau of Apprenticeship and Training U.S. Department of Labor.

4.2 Transcripts or grade reports should be sent to the respective county board of education personnel office for verification of training and assignment of credit for payroll purposes.

5977i/3/94

COMMENTS AND SUGGESTIONS LOG
 PROPOSED POLICY 5301: SCHOOL SERVICE PERSONNEL
 TRAINING COMPARABLE TO TWELVE (12) SEMESTER HOURS
 OF COLLEGE CREDIT REGULATIONS

Type
 - Negative
 + Positive
 • Neutral

Action
 N: No Response
 NA: Not Accepted
 A: Accepted

Section	Date Received	Individual/Organization	Comments/Suggestions	Action/Type	Rationale
I. General	5/20/94	Barbara Brazeau WV Dept. of Education 1900 Kanawha Blvd, E. Charleston, WV 25305	Sections 3 and 4 "approved institution of higher education" The word "approved" should be amended to "accredited". The definition of an <u>accredited institution</u> of higher education needs to be included.	A •	
	5/26/94	Patsy Marcum/LSIC P.O. Box 505 Crum, WV 25669	This is a very good idea. It reinforces the idea of education for everyone; as well as having better educated personnel serving the needs of our children. Many people will pursue their education if it does not "strap" their finances. This will give them the incentive to go a little farther down the education avenue.	N+	
	5/26/94	Dr. Richard G. Hoover Upshur Co. Schools 102 Smithfield St. Buckhannon, WV 26201	I think that it is going to be difficult to determine what course work is relevant to a current or <u>anticipated</u> area of employment (Section 3.1). How will relevant be defined? Who decides what is relevant? Do we apply twelve (12) hours of credit to a job we anticipate obtaining next semester, next year, or a job one hopes to have five (5) years from now?	NA •	County responsibility to determine

Section	Date Received	Individual/Organization	Comments/Suggestions	Action/Type	Rationale
	5/26/94	Roane-Jackson Tech. Center 4800 Spencer Road Leroy, WV 25252	Must the 180 hours of tech training at a vocational school be post secondary? Can a combination of voc. training and college hours be used to meet this criteria? Can a variety of short term classes (adult supplemental) be used to meet this requirement?	NA NA NA	Comparable to 12 college hours implies post secondary County Determination Excluded by Code
	5/28/94	Cabell County Schools 620 20th Street Huntington, WV 25709	It is suggested that consideration be given to include a statement about the eligibility or noneligibility of a service employee who has not completed high school but has completed the requirements for twelve (12) hours comparable credit. Your attention is invited to the following situation: A heating and air conditioning mechanic did not complete the requirements for a high school diploma. However, this employee did complete 1200 contact hours vocational technical training including certification for refrigerant recovery. Would this employee qualify for \$10.00 increment for college credit & not be eligible for the increment for a high school diploma?	NA	Comparable to 12 college hours implies post secondary

Section: Date Received Individual/Organization Comments/Suggestions Action/Type Rationale

5/28/94
 LuCinda Allard
 1579 Mary Lou Retton Dr.
 Fairmont, WV 26554

I think this is a wonderful incentive for service personnel. N+

6/1/94
 Sharon Schill
 109 W. 7th Avenue
 Ranson, WV 25438

This is an appropriate step in the right direction. N+

I would like to see these courses taken and passed rebated back to the Boards of Education. Teacher's are reimbursed, I also would like to be. I have 32 credit hours of undergraduate work, 13 years employment in the school system, and I receive approximately \$15,200 a contract year. I am in the room teaching opening exercises 45 minutes a day by myself. I also have 14 children in my reading group while the teacher has 4 children. I love the work, but if my husband died, I and my 2 children would qualify for free lunches and food stamps, etc. I would like to see a high \$ amount, "say \$500" for each 15 credit hours. Thank you for letting me have my say. Lets continue to move forward to guarantee decent living for our ed. assistants.

Section	Date Received	Individual/Organization	Comments/Suggestions	Action/Type	Rationale
	6/1/94	Mildred Arnold Aide Paraprofessional Rt. 1, Box 57 Arnoldsburg, WV 25234	Very good idea.	N+	
	6/2/94	Phyllis Amrhein Secretary Warwood Gr. School 1200 Richland Avenue Wheeling, WV 26003	I would like further clarification of the content for Policy 5301. For service personnel salary purposes only, twelve (12) semester hours of college credit is comparable to 180 contact hours of training for a state approved voc. or trade school.	NA•	
			Many extensive computer classes have been available through state Adult Continuing Education programs. Since these programs are approved by individual Boards of Education, and classes are made available during evening hours in order to "learn" and/or upgrade computer skills, would class hours from an Adult Continuing Education programs be considered toward the requirements for salary purposes?	NA•	Excluded by Code

Section:

Date Received

Individual/Organization

Comments/Suggestions:

Action/Type

Rationale

Many of these classes are scheduled from six (6) to fourteen (14) weeks, two (2) or three (3) hours per session. The classes are taught by certified instructors, and fees for the classes depend upon the length of the course.

I have been employed as an elementary school secretary for the past fifteen years. When I accepted this position, computers were not readily available, and computer skills were not a requirement for employment. Since technology has changed considerably over the years, this is now a major part of the administration office.

Evening Adult Education
 classes provided me with the
 opportunity to learn the
 computer skills I now apply
 to my daily work schedule.
 As a result of basic in-
 struction and programming
 courses (for a total of
 108 hours), I have written
 programs to help me ex-
 pedite and make more
 efficient the following job
 responsibilities.
 school's general ledger;
 school's cafeteria ledger;
 student attendance records
 which include monthly,
 quarterly, and annual
 individual student data;
 student data base;
 word processing;
 Print Shop and Print Shop
 Companion for preparing
 notices, monthly school
 newsletters, classroom
 banners, etc.

NA•

Excluded by Code

Due to the normal interruptions
 in a school office, I do not feel
 it would be possible to learn
 the variety of functions a
 computer has to offer during a
 regular work schedule. I feel
 quite fortunate that Adult
 Ed. classes are available in
 my area.

Please consider the possibility
 of including Adult Ed. evening
 classes as a part of comparable
 credit for service personnel
 salary purposes only.

Section: Date Received: Individual/Organization: Comments/Suggestions: Action/Type: Rationale:

Carroll L. Staats
Superintendent
Jackson County School
PO Box 770
Ripley, WV 25271

June 2, 1994

Section 3.1 - How is the determination to be made whether or not the college hours are relevant? Does not the working of the law make all college hours count toward the twelve semester hours?

County Determination

NA

Section 3.2 - Need to determine if the vocational training can be taken as part of the high school program or if it must be in a post-secondary program.

Comparable to 12 college hours implies post-secondary

NA

Jerry Roncella

June 2, 1994

The policy as written does not specify that the training from an approved vocational trade school be post-secondary training. If the intent of the policy is that the training be post-secondary, it should so specify.

Comparable to 12 college hours implies post-secondary

NA

We have received a number of questions regarding the employees attendance at the vocational center prior to graduation from High School. The employees are interpreting the policy to mean that they can count their vocational training prior to graduation.

County determination

NA

The statement that the vocational training be in an area relevant to current or anticipated employment is also causing some concern. What constitutes "relevant area" and who decides what is "relevant training"?

County determination

NA

Section	Date Received	Individual/Organization	Comments/Suggestions	Action/Type	Rationale
	June 3, 1994	Brenda McLane Hurricane High School 3550 Teays Valley Road Hurricane, WV 25526	In favor - Great inspiration for continuing education.	N+	
	June 3, 1994	L.I. Epling, II Farmers Friend, Inc. P.O. Box 652 Spencer, WV 25276	I support this policy and would like to see it passed.	N+	
	June 6, 1994	Emma Jackson P.O. Box 22 Charleston, WV 25321	Service personnel should have more training offered in the summer.	N+	
	June 6, 1994	Star B. Briggs Metzel County School 333 Foundry Street New Martinsville, WV 26155	I am a secretary for Metzel who graduated from Mountain State College on 8/24/69 with a total of 74 Quarter hours. I feel that I should not be excluded from the \$10.00 per month pay increase because my college credit hours are not in semester hours.	NA*	County determination
			Please include in your definition of hours those in-situations of higher learning, such as business colleges, which use the quarter hour accreditation system. Computations to translate total quarter hours into semester hours could be obtained by dividing by 4. For example, if there were 74 quarter hours divided by 4 this would equal 18 semester hours.	NA*	Incorrect formula - quarter hours multiplied by 2/3 equals semester hours- 12 quarter hours equal 8 semester hours

Mountain State College is accredited by the Accrediting Commission for the Association of Independent Colleges and Schools- a recognized accrediting body of the U.S. Office of Education.

June 6, 1994
 Mitzi Akers
 Secretary
 Beckley Jr. High
 320 S. Kanawha St.
 Beckley, WV 25801

Why is faculty senate being sent proposals that has absolutely nothing to do with them? Service Personnel has been excluded from faculty senate meetings. How is the 180 hours determined? Is it one?

NA•

June 6, 1994
 Martha Dean
 Superintendent
 Wetzel Co. Schools
 New Martinsville, WV 26155

County determination

NA•

I disagree strenuously with the use of "anticipated area of employment in 3.1 and 3.2. Personnel may desire to change their area of employment but no opportunity for the change could present itself for many years. That would create a situation where the county board of education would have to pay a bus driver extra for training received to be a secretary even though the skills learned were never applied to the job held. My suggestion is that a provision be added whereby training could be re-evaluated upon changing job classifications.

Related to the first comment, I believe 3.1 should read: "Twelve semester hours of credit from an approved institution of higher education in course work relevant to the employee's current class title." I believe this statement relates directly to State Law of WV §18A-4-8 and will result in less disagreement between employees and personnel directors. 3.2 should be changed in a similar manner.

June 6, 1994 Patricia H. Solomon
Ohio County Schools
2205 National Rd.
Wheeling, WV 26003

3.1 Relevant to a current assignment may be difficult to interpret consistently amount the 55 counties. NA•

County determination

Will this anticipated inconsistency create problems among service personnel throughout the state?

5.1 An employee will probably believe that training in any service personnel classification could be an anticipated area of employment thus becoming eligible for more money in their current assignment. NA•

County determination

4.1 We have recently been asked by many of our service personnel employees whether or not training obtained as a member of the Armed Forces will count for these 180 contact hours of training? NA•

County determination

Section	Date Received	Individual/Organization	Comments/Suggestions	Action/Type	Rationale
			Would this training be approved under this section of the policy?	NA*	County determination
			If so, what kind of documentation would be needed for verification?	NA*	County determination
	June 8, 1994	Delores Ranson Asst. Supt. Jackson County Schools PO Box 770 Ripley, WV 25271	Must the 180 contact hours of training from an approved vocational or trade school be post secondary? Please clarify in the policy.	NA*	Comparable to 12 collage hours implies post-secondary
	June 8, 1994	Betty Lou Rine Wetzel Co. School HC 61, Box 102 New Martinsville, WV 26155	In the 1980's, West Virginia's Nutritional Department had a Comprehensive Training Program that consisted of 5 or 6 sessions, which were 3 or more hours long. The food service people who took this training should be on record with the Nutrition Department and should compare to the hours needed in Policy 5301.	N*	Already in Policy
			I also feel that if college classes are taken and they pertain to your field of training then the credits should also be given to apply Proposed Policy 5301.		

Section	Date Received	Individual/Organization	Comments/Suggestions	Action/Type	Rationale
	June 8, 1994	Sandra Sherrard Rt. 1, Box 157 Gerrardstown, WV 25420	I think this is a good policy however, I have a question Will classes taken through a county adult ed. program be considered? I'm referring to vocational classes such as shorthand, computer, typing, etc. Contact hours for each subject is usually 72 hours. Thank you, in advance, for your help.	NA+	Excluding Code unless in trade or vocational school
	June 8, 1994	Emma Lou Akers, Principal Ceredo Kenova Middle Sch. Box 894 Ceredo, WV 25507	Service personnel are a valuable asset to the comprehensive educational program. It also gives them an opportunity to improve their self imago and try to move forward in the work place.	NA+	
	June 8, 1994	Wilma Post Washington Dist. El. Sch. Rt. 7, Box 234 Buckhannon, WV 26201	3.1 Not all courses taken from vocation, trade or higher learning schools are relevant to the current or anticipated "area" of employment. The term, "...relevant to a current or anticipate area of employment" needs to be clarified.	NA•	County determination

Section	Date Received	Individual/Organization	Comments/Suggestions	Action/Type	Rationale
			Also, for what period of time does the term "anticipated" include? Does this apply to only current positions?	NA•	County determination
			If employees are receiving \$10.00 extra per month, may the employee change positions not relevant to the required credit hours and still receive the \$10.00 extra per month?	NA•	County determination
			Can a person who holds 2 half-time positions employed as a full-time employee be credited with both the vacation hours and college hours?	NA•	Can only be paid for one fulltime position
			RE: Section 4: A list of Vocational and Trade Schools approved and accepted, should be sent to the county boards of education.	NA•	Too large to list

Section Date Received Individual/Organization Comments/Suggestions Action/Type Rationale

June 9, 1994
 Nora L. McDiffitt
 Hetzel Co. School
 P.O. Box 374
 Pine Grove, WV 26419

I am a secretary for Weizel County Schools who attended Mountain State College in 1964-65 with a total of 36 quarter hours. I feel that I should not be excluded from the \$10.00 per month pay increase because my college credit hours are not in semester hours.

NA

Please include in your definition of hours those in-situations of higher learning, such as business colleges, which use the quarter hour accreditation system. Computations to translate total quarter hours into semester hours could be obtained by dividing by 2. For example, if there were 36 quarter hours divided by 2 this would equal 18 semester hours.

NA

Incorrect formula

Mountain State College is accredited by the Accrediting Commission for the Association of Independent Colleges & Schools -- a recognized accrediting body of the US Office of Education.

June 10, 1994
 Jean Simers
 Calhoun Co. Schools
 P.O. Box 110
 Grantsville, WV 26147

I feel that Policy 5301 gives service personnel an incentive to continue their education/training in a positive manner.

June 10, 1994
 Margaret Arwasky
 113 So. Johns Rd.
 Weirton, WV 26062

I would like very much to have additional training in my field. I am a single income family and I have not checked into the amount of money it would cost to obtain 12 semester hours of college credit. I believe it would cost more than \$120.00 a year, less taxes to obtain these 12 credit hours. As stated before, this cost would not fit into my budget. To my knowledge, college credit hours are offered to teachers at a minimal cost. Why aren't classes such as those offered to service personnel? I have 6 credit hours now and some credit that did not apply for qualifications for credit. If you have any information on this subject matter, please send it to me.

June 17, 1994
 Robert P. Mason
 Mineral Co. Schools
 One Baker Place
 Keyser, WV 26726

180 contact hours of training from a state approved vocational or trade schools is an appropriate number of hours to be comparable to 12 college credit hours. Section 4.1 seems unduly restrictive. For example, how would certified continuing education credits from a community college in Maryland fit into this section? Also, what about specialized training, e.g., EMI training, HMT training, etc.?

There will be a lot of questions in this area, particularly for those who obtained their training years ago, e.g., business schools no longer in operation, out-of-state training centers, etc.

We will need clarification on the following issues:

To what degree is this policy retroactive, i.e., can training taken in 1955 count towards the pay increment?

Please help us define what is "...an area relevant to... anticipated employment? Could this be:

- another service personnel classification?
- a professional personnel position?
- any other position, either in or out of education?

June 21, 1994
 Barbara Fish
 Parkersburg H.S.
 112 Woodshire Drive
 Parkersburg, WV 26100

Policy 5301 was reviewed by fourteen members of the Parkersburg High School Improvement Council.

We generally agree that our school service personnel are a valuable asset and that it is desirable for them to be as well educated as possible. Therefore, it is agreed that this policy is reasonable and needed.

NA*
 NA*
 No time requirement in Code
 County determination

N+

SECTION Date Received Individual/Organization Comments/Suggestions Action/Type Rationale

June 10, 1994 Jean Simers
Cathoun County Schools
P.O. Box 110
Grantsville, WV 26147

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M+

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113 So. Johns Rd.
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M+

June 17, 1994 Robert P. Mason
Mineral Co. Schools
One Baker Place
Keyser, WV 26726

180 contact hours of training from a state approved vocational or trade schools is an appropriate number of hours to be comparable to 12 college credit hours. Section 4.1 seems unduly restrictive. For example, how would certified continuing education credits from a community college in Maryland fit into this section? Also, what about specialized training, e.g., EMT training, HMT training, etc.?

NA

Accredited colleges are acceptable and code excludes all but trade and vocational schools.



KEN HECHLER
Secretary of State

MARY P. RATLIFF
Deputy Secretary of State

A. RENEE COE
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CATHERINE FREROTTE
Executive Assistant

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Director, Corporations

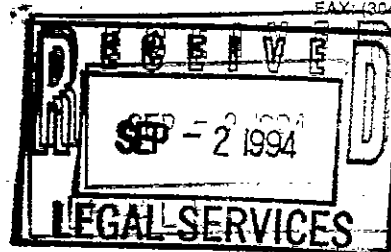
(Plus all the volunteer
help we can get)

FAX: (304) 558-0900

STATE OF WEST VIRGINIA

SECRETARY OF STATE

Building 1, Suite 157-K
1900 Kanawha Blvd., East
Charleston, WV 25305-0770



TO: Vic Barone

AGENCY: Education

FROM: JUDY COOPER, DIRECTOR, ADMINISTRATIVE LAW DIVISION

DATE: September 1, 1994

THE ATTACHED RULE FILED BY YOUR AGENCY HAS BEEN ENTERED INTO OUR COMPUTER SYSTEM. PLEASE REVIEW, PROOF AND RETURN IT WITH ANY CORRECTIONS. IF THERE ARE NO CORRECTIONS, PLEASE SIGN THIS MEMO AND RETURN IT TO THIS OFFICE. YOU WILL BE SENT A FINAL VERSION OF THE RULE FOR YOUR RECORDS.

PLEASE RETURN EITHER THE CORRECTED RULE OR THIS FORM WITHIN TEN (10) WORKING DAYS OF THE DATE YOU RECEIVED THIS REQUEST. CALL IF YOU HAVE ANY QUESTIONS.

SERIES: 163 TITLE: 126 Education

* THE ATTACHED RULE HAS BEEN REVIEWED AND IS CORRECT.

SIGNED: _____

TITLE OF PERSON SIGNING: _____

DATE: _____

* THE ATTACHED RULE HAS BEEN REVIEWED AND NEEDS CORRECTING. THE CORRECTIONS HAVE BEEN MARKED.

SIGNED: Vic A Barone

TITLE OF PERSON SIGNING: Director, Legal Services

DATE: 9-7-94

NOTE: IF YOU ARE NOT THE PERSON WHO HANDLES THIS RULE, PLEASE FORWARD TO THE CORRECT PERSON.

