

**THE
PETERSON
SCHOOL**

STEAM ENGINEERING • HVAC CONTROLS & ENERGY MANAGEMENT • HOISTING LICENSE • CONSTRUCTION SUPERVISOR
ELECTRICITY • FACILITIES TECHNICIAN • HVACR • GAS HEAT • OIL HEAT • FIRE ALARM • WASTEWATER • PLUMBING • OSHA

25 MONTVALE AVENUE, WOBURN, MA 01801
TELEPHONE (781) 938-6656
FAX (781) 932-6884

September 3, 2015

Rachael Pauze
Commonwealth of Massachusetts
Division of Professional Licensure
1000 Washington Street
Boston, MA 02118

Re: DPL Reg Review Comments – The Peterson School

Dear Mrs. Pauze,

The Peterson School (the “School”) has been carefully evaluating the proposed regulations at 230 CMR 12.00 - 17.00. (the “Regulations”). The School and its staff strongly support the efforts of the Division of Professional Licensure (the “DPL”) to encourage private for-profit schools to implement robust student protection and compliance programs. As discussed below, however, we have some concerns with the Regulations.

Overall, the Regulations appear aimed primarily at the activities of Title IV schools - protection of prospective and enrolled students, and issues surrounding the recruitment and administration of their programs. Reform of these programs is important, as clearly there have been ‘bad actors’ in the industry. There are, however, schools like The Peterson School, which are non-Title IV schools. Many of our students are already working in the trades. Most of our courses are held during the evenings. Our students do not leave our school with student loans. For these reasons, we are different and compliance with some of the new regulations would at the least cumbersome to our business and at the worst a significantly negative impact to our students.

Specifically, the Peterson School is concerned with the following:

230 CMR

12.00: Definitions:

“Sales Representative. Any person who engages in Solicitation within the Commonwealth of Massachusetts regardless of the location of the School, provided however that Administrators and Admissions Representatives are not considered Sales Representatives.”

Historically, the School has internally referred to the distribution of course catalogs as 'sales'. In reality, the School merely distributes course catalogs (3x / year) to mechanical supply houses, where stands are maintained, from which anyone interested can take a catalog. There is no direct contact with students during this process. We use office staff to complete the distributions and pay them for each stop. The School appreciates the need to be compliant but does not hire or compensate any 'Sales Representatives', in the intended sense. We make this statement in the interest of open dialogue surrounding a topic which can be a bit vague. We do not believe that we engage in any efforts surrounding recruitment of students in the sense described in the Regulations.

14.05: Staff (1) Pursuant to M.G.L. c. 112, § 263(b), all Staff shall be approved by the division.

The School should be able to conduct it's own due diligence when hiring staff. With each license renewal, a listing of employees with resumes is provided. This should be sufficient. Requiring division approval with each hire is tremendously cumbersome for the operation of a business. Additionally, the volume of work created at DPL to approve all non-instructor hires would only stretch already overworked resources. The School's secondary concern is that other more essential work might be delayed.

15.04: Enrollment Contract and Student Refunds

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As an accommodation to our students, the School allows very flexible payment terms. Students pay for courses, individually. Some students make a full payment prior to the start of a course. Other students make a down payment and weekly payments for the duration of the course. Still, other students fall somewhere in the middle – making larger amount payments less frequently. Our students have varying abilities to pay, so we do not strictly hold them to a payment plan. We are flexible. As a result, any refunds as a result of a student dropping out of a course would be likely change as the course proceeded and the sometimes random payments are made. This flexible payment policy is something that the School has provided for years, and has been a true benefit to the students. Compliance with this new regulation would be impossible without eliminating a School policy that has been a great benefit to our students. If this regulation is approved, the School would hope for an exemption.

“A school shall not accept a signed enrollment contract from a perspective student until at least seventy-two hours after the school provided the student with the enrollment contract.”

While this is intended to be a student protection, it creates a limitation for the student in order to provide protection that already seems to exist. The School has many students that come to the first day of class to sign up and begin attending that same day. We allow our students to do so, as it's a convenience for them. For these students, the refund policy already provides them with

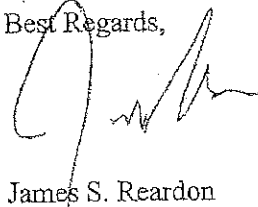
5 days (120 hours) of full refund protection. Additionally, some of the School's courses are 1 day in duration (CE courses). These courses are required for the maintenance of individual trade licensing and may be the students' last option to compliance with CE requirements. In both cases, this requirement is a hindrance to the student. If this regulation is approved, the School would hope for an exemption.

15.05: Disclosures

These statistics are understandably important in the evaluation of full-time programs where the student is making a large investment and often times taking on a tremendous debt burden. However, The Peterson School does not offer such programs. The majority of our students take a single course at a time. Our students pay in advance or throughout the duration of the course. They do not leave our school with student loans. The vast majority of the School's offerings are during the evenings, as many of our students are already employed. Tracking graduation rates (we don't have 'graduations' for students taking a single course - which most of our students do) and employment statistics for our students would be difficult and not meaningful. It should also be noted that even the Title IV schools that use such metrics are concerned with the variability of calculations and inconsistency of the information that results, as mentioned in the listening session.

Thank you for your time and consideration on these items. The Peterson School and its staff appreciate all the hard work that DPL has put into this effort.

Best Regards,



James S. Reardon
President
The Peterson School