

1 rehabilitation.

2 Thanks again for this opportunity.

3 **MR. MADZELAN:** Thank you.

4 **MR. CUMMINGS:** I have a question.

5 Mr. Ureña, could you describe your institutional
6 concerns of whether you found that there were a
7 small density of high violators or whether you
8 thought it was pervasive?

9 **MR. UREÑA:** Based exclusively on the
10 stories our clients come in with, it seems to be
11 more of a pervasive problem rather than a high
12 density problem. There do appear to be a couple of
13 agencies which seem to be better at what they do,
14 but, for the most part, a lot of agencies aren't,
15 and sometimes these agencies even subcontract with
16 other companies which themselves are pretty bad.

17 **MR. MADZELAN:** Thank you.

18 Lauck Walton, Westwood College.

19 **MR. WALTON:** Good afternoon. I'm Lauck
20 Walton. I'm a Regional Vice President for Westwood
21 College; work in the Northern Virginia area. On
22 behalf of Westwood College, I thank you all for the
23 opportunity to testify today.

24 Before I get into Westwood's substantive

1 comments, I have to very briefly respond to the
2 comments made about Westwood College and career
3 colleges in general. On behalf of our tens of
4 thousands of graduates, our current students, and
5 our faculty and staff, we're deeply offended by the
6 accusations made a few moments ago. The
7 plaintiff's firm does not represent a class of
8 students. They represent four students seeking to
9 represent a class. Westwood does not think this is
10 the appropriate forum to litigate this matter.
11 Suffice it to say that we think their allegations
12 are frivolous and we will demonstrate that in the
13 appropriate forum in due course.

14 Westwood is provided--is 100 percent
15 committed to providing students with the knowledge,
16 skills, and credentials to enable them to launch,
17 enhance, or change their careers, and that
18 commitment informs our comments today.

19 So turning to the issues at hand, they're
20 important and I would like to speak to the
21 Department's proposed issues based on my hands-on
22 experience working two Westwood campuses for 850
23 students today.

24 Current regulations call for satisfactory

1 progress to be evaluated one time per year. At
2 Westwood, we evaluate five times per year, once
3 each term. We do that because we believe the
4 additional evaluations benefit students and it far
5 outweighs the administrative costs. Students that
6 need extra assistance get it quickly and
7 efficiently and have an improved chance of
8 graduation or will end a program of study even
9 earlier. Both of these are in the public interest.

10 The current regulations with respect to
11 admissions compensation simply aren't clear. No
12 reputable college wants to incent representatives
13 to enroll unqualified students who aren't going to
14 graduate. Currently the regulation is just unclear
15 to the point where institutions are afraid to
16 provide a Starbucks gift card to their admissions
17 reps. You know, let's just get the rules down.
18 Whatever they are, we can abide by them. It would
19 be no problem. Spell out the regulations, what's
20 permitted and not prohibited, and give the colleges
21 an opportunity to correct minor issues when they
22 are challenged.

23 We commend the Department for considering
24 the definition of gainful employment. This is a

1 key component of Westwood's mission. The
2 Department has a great deal of program data already
3 sorted by the CIP code. We certainly recommend
4 collecting appropriate employment information by
5 CIP code and allowing recognized accrediting
6 agencies the ability to work with the institutions
7 to evaluate those in subjective cases.

8 Similarly, Westwood believes that our
9 current regulations with respect to the definition
10 of credit unit are properly determined in
11 conjunction with those recognized accrediting
12 agencies, and that no additional regulations
13 prevent students from--preventing them from taking
14 full advantage of the year-round Pell program.
15 This is a benefit to all eligible students.

16 Westwood supports simplification of the
17 verification process. We think it adds credibility
18 and integrity to the award of Title IV, however,
19 pretty complicated. Heard from a number of
20 speakers today, anything we can do to simplify it
21 would be great. We'd like to get it right. The
22 easier we can get the information, if we can share
23 it with the IRS, that'd be great. If we can
24 simplify the forms, that'd be great. But if we can

1 reduce the burden on the students and the families,
2 we will have made progress.

3 Finally, Westwood applauds the Department
4 for working on the definition of the high school
5 diploma. As a member of the State Council of
6 Higher Education of Virginia's Diploma Mill Task
7 Force, this is a very complicated issue. Like one
8 of the other speakers earlier today, Westwood has a
9 list of over 100 fraudulent high school providers.
10 We won't accept those as a matter of policy. But
11 with the advent of more and more home school
12 options, international education, so many
13 possibilities in a world that's expanding every
14 day, we need to have clear definitions of what's
15 permitted, what kind of institution is going to
16 qualify, and it's a great topic for the federal
17 government to help us sort out and make right.

18 Thank you so much for your time.

19 **MR. MADZELAN:** Thank you.

20 Theodore Levitt, Miami-Dade.

21 **MR. LEVITT:** Afternoon, everyone. I'm Ted
22 Levitt from Miami-Dade College. I am the Director
23 of College Communications there, but in my other
24 duties as assigned, I spend a good deal of time in