

# STATE OF COLORADO



DEPARTMENT OF HIGHER EDUCATION  
*Colorado Commission on Higher Education*

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November 19, 2009

Ms. Judy Anderson-Kotts  
Director, Regulatory Affairs  
Westwood College  
2000 S. Colorado Blvd., 2-800  
Denver, CO 80222

Dear Ms. Anderson-Kotts:

The Colorado Department of Higher Education has received forty-two (42) complaints from former and current students of Westwood College Online, Denver North, and Denver South campuses. Pursuant to its authority under state law, Section 23-2-104(2)(a), C.R.S. and CCHE Policy Section I, Part J, paragraph 6.01.02, the Department of Higher Education has reviewed the complaints and determined that they warrant further investigation as a deceptive trade practice. Both the number and similarity of complaints is a serious concern to the Department of Higher Education.

The complaints received address misinformation regarding 1) transferability of course work, 2) the Apex loan program, and 3) the misuse of the title "Admissions Representatives". These three areas of complaints are addressed as follows.

- 1.) Students assert that they were wrongly led to believe credits earned at Westwood could be transferred anywhere in the country and that transferability is a direct result of the college holding accreditation. These allegations, if true, are violations of section 23-2-104(d), C.R.S., "It is a deceptive trade practice for: A school or agent to intentionally and materially represent falsely, directly or by implication, that students completing a course or program of instruction successfully may transfer credit therefore to any institution of higher education."
- 2.) The Department of Higher Education has also received numerous complaints pertaining to the Apex Loan program. Students complain that they had no knowledge of taking out a loan prior to receiving their first bill for re-payment. These complaints, if valid, are violations of section 23-2-104(a), C.R.S.: "It is a deceptive trade practice for: A school or agent to make or cause to be made any statement or representation, oral, written, or visual, in connection with the offering of educational services if such school or agent knows or reasonable should

have known the statement or representation to be materially false, substantially inaccurate or materially misleading.”

- 3.) It also has been alleged that the admissions representatives at Westwood College are, in fact, paid recruiters and don't have the experience to act as academic counselors to prospective students. If true, the designation of the title “admissions representatives” can be construed as a deliberate action to mislead or deceive interested students with regard to the qualification of the employee. If accurate, this allegation could be a violation of section 23-2-104(h), C.R.S.: “It is a deceptive trade practice for: A school or agent to designate titles to employees whose primary job duties are to recruit students that may mislead prospective students or the public regarding the authority or qualifications of such employees.”

The number, nature, and similarity of student complaints against Westwood College require the Department of Higher Education to initiate an official request for information from Westwood College on the complaints described in this letter. Therefore, pursuant to section 23-2-104(2)(b), C.R.S., and CCHE Policy Section I, Part J, paragraph 6.01.02, the Department of Higher Education is forwarding the complaints to Westwood College for its written response. Under state law, Westwood College shall have thirty (30) days to respond to the Department. A copy of Westwood College's response must be forwarded to the student. During this thirty (30) day period, Westwood College may attempt to resolve the complaint with the student, and the Department shall assist in efforts to resolve the complaints.

Thank you for your cooperation.

Sincerely,

Heather DeLange  
Degree Authorization Act Officer

Cc: Tony Dyl, Assistant Attorney General, State of Colorado  
Julie Carnahan, Chief Academic Officer, Dept of Higher Education  
Bill Ojile, Chief Legal & Compliance Officer, Alta Colleges, Inc.  
Karen Solinski, Vice President for Legal and Governmental Affairs, HLC