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Macias, Wendy

From: [REDACTED]
Sent: Tuesday, June 23, 2009 5:40 PM
To: negreg09
Subject: DOE final comments.pdf - Adobe Acrobat Professional
Attachments: DOE final comments.pdf

Attached are supplemental written comments of Westwood College.

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WESTWOOD COLLEGE®

June 23, 2009

Ms. Wendy Macias
U.S. Department of Education
1990 K Street, NW.
Room 8017
Washington, DC 20006

Re: HEA Negotiated Rulemaking – Supplemental Comments of Westwood College

Dear Ms. Macias:

Westwood College provides the following written comments as a supplement to oral comments made by Westwood College officials at the Denver—home of Westwood’s main campus and Central Administrative offices—and Philadelphia negotiated rulemaking public hearings. In these written comments, Westwood College supplements the oral comments it made on the compensation structure for admissions representatives, one of the issues raised in the Department’s Notice of Proposed Rulemaking.

Westwood College is an institution of higher learning committed to operating with integrity. The College has implemented an admissions compensation plan in compliance with the 2002 “safe harbor” rules adopted by the Department. While certainly not perfect, “safe harbor” rules do provide some guidance to schools in developing, implementing, and administering a compliant admissions compensation plan. The Department will create greater uncertainty should it eliminate the “safe harbors,” as some have advocated, without the corresponding implementation of new rules that provide even greater guidance and clarity than the existing rules.

Westwood College is eager to abide by whatever rules the Department promulgates, and it requests that the Department develop clear, concise, comprehensive, and consistent guidance in its formulation of any new rules governing admissions compensation. Any changes in the rules should, of course, be based on facts and evidence of existing admissions practices, rather than on dated concerns, assumptions, speculation, and innuendo or isolated instances of alleged misconduct. The exceptions should not create the rule.



Ms. Wendy Macias
June 23, 2009
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Westwood College would welcome the opportunity to participate in the rulemaking process and provide such information to the process. Thank you.

Sincerely,

