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September 2, 2010

Ms. Jessica Finkel
U.S. Department of Education
1990 K Street, NW
Room 8031
Washington D.C. 20006-8502

**RE: Docket ID ED-2010-OPE-0012
Program Integrity: Gainful Employment; Proposed Rule**

Dear Ms. Finkel:

On behalf of Milwaukee Area Technical College (MATC), I am commenting on the above-referenced Department of Education's (DOE) proposed rule, published in the Federal Register on July 26, 2010 (Volume 75, Number 142).

The proposed rule would amend the Student Assistance General Provisions to establish measures for determining whether certain postsecondary educational programs lead to gainful employment in recognized occupations, and the conditions under which these educational programs remain eligible for the student financial assistance programs authorized under title IV of the Higher Education Act of 1965, as amended (HEA).

MATC is Wisconsin's largest publicly supported two-year technical college. The college offers 200 degrees, diplomas, certificates and apprenticeships and nearly 400 transfer options leading to bachelor degrees. A large pre-college program enables students to complete high school and prepare for higher learning by offering adult high school classes, GED/HSED preparation, English as a second language instruction, and basic skills instruction at all levels. The Office of Corporate Learning provides customized training to incumbent workers. Approximately 48,000 students per year, consisting of 48% minority students, attend MATC's four campuses and numerous community-based sites, or learn online. Approximately 98% of MATC's graduates stay in Wisconsin and build their careers and businesses here.

Downtown Milwaukee Campus
700 West State Street
Milwaukee, WI 53233-1443

Mequon Campus
5555 West Highland Road
Mequon, WI 53092-1199

Oak Creek Campus
6665 South Howell Avenue
Oak Creek, WI 53154-1196

West Allis Campus
1200 South 71st Street
West Allis, WI 53214-3110

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Ms. Jessica Finkel
September 2, 2010
Page 2

MATC's Board of Directors, administration, faculty and students support the DOE's proposed rule, and encourage prompt adoption and enforcement of the performance standards set forth in the rule.

Since so many of our students depend on the integrity and viability of federal student financial assistance programs, we applaud DOE taking action to protect and preserve federal student financial aid programs. Like the DOE (and others who have and will be submitting comments to you), we have also taken note of the rapid proliferation of educational institutions that have taken advantage of the nation's student financial assistance programs with questionable regard for the well-being of the students they have recruited or the long term viability of the nation's student financial aid programs. In our own community we have seen a rapid increase in the number of such institutions, and we have sadly noted in recent media reports that many of them have an unsatisfactory record of helping their students to gain meaningful employment. Their students, in turn, have a poor record of repaying their federal student financial assistance loans (well below the thresholds presented in the DOE proposed rule).

As was noted in the background/summary information introducing the proposed rule, the DOE has done an admirable job of seeking public input from stakeholders and the general public prior to proposing these new standards. All of us involved in higher education in the country appreciate the DOE's effort to make the proposed thresholds fair and non-punitive. The DOE has the commitment of the MATC Board and Administration to work cooperatively with the department to implement these new standards when they become effective. We are already proud of the counsel and advice which our own financial aid personnel offer our students. We are thankful that other institutions will be required to devote more resources and time to assisting their students in a similar fashion if these new thresholds are adopted.

Thank you for the opportunity to comment on this proposed rule. We look forward to working with the DOE on implementing these needed new standards.

Sincerely,



Dr. Michael Burke
President