

University of Denver Institution Policy on Recruiting, Marketing, and Advertising

The University of Denver believes in supporting and protecting our students through fair and equitable practices, which is inclusive of our military and veteran students. We abide by all federal laws, including the <u>Higher Education Act</u> (H.E.A) for Title IV funding, and the principles of the National Association for College Admission Counseling (NACAC).

The regulation known as <u>ED 34 C.F.R 668.14</u> restricts the use of commission, bonus, or other incentive pay to secure enrollments or the award of financial aid. The University of Denver, a Title IV participant, follows the program participation agreement in 668.14, which reads:

Institutions of higher learning, "will not provide any commission, bonus, or other incentive payment based in any part, directly or indirectly, upon success in securing enrollments or the award of financial aid, to any person or entity who is engaged in any student recruitment or admission activity, or in making decisions regarding the award of title IV, HEA (program funds."

The regulation known as <u>ED 34 C.F.R 668.71-668.75</u> outlines substantial misrepresentation prohibited for participating schools in the Title IV program. We adhere to these regulations which read:

"An eligible institution is deemed to have engaged in substantial misrepresentation when the institution itself, one of its representatives, or any ineligible institution, organization, or person with whom the eligible institution has an agreement to provide educational programs, marketing, advertising, recruiting or admissions services, makes a substantial misrepresentation regarding the eligible institution, including about the nature of its educational program, its financial charges, or the employability of its graduates."

Substantial misrepresentations are prohibited in all forms, including those made in any advertising, promotional materials, or in the marketing or sale of courses or programs of instruction offered by the institution."

Misrepresentations are defined as:

- A misleading statement includes any statement that has the likelihood or tendency to deceive.
- A statement is any communication made in writing, visually, orally, or through other means.
- Misrepresentation includes the dissemination of a student endorsement or testimonial that
 a student gives either under duress or because the institution required the student to make
 such an endorsement or testimonial to participate in a program.

The University of Denver follows and upholds the Department of Veterans Affairs Principles of Excellence, including <u>DoD's</u> policies on tuition assistance. Which include the following criteria:

The Principles of Excellence is a voluntary initiative through the Department of Veterans Affairs. Schools that agree to participate will:

- Provide students with a personalized form covering the total cost of an education program.
- Provide educational plans for all Military and Veteran education beneficiaries.
- End fraudulent and aggressive recruiting techniques and misrepresentation.
- Provide accommodations for Service Members and Reservists absent due to service requirements.
- Designate a Point of Contact for academic and financial advising.
- Ensure accreditation of all new programs prior to enrolling students.
- Align institutional refund policies with those under Title IV.

The University of Denver is a voting member of NACAC. We are committed to the <u>Statement of Good Practice</u>: <u>NACAC's Code of Ethics and Professional Practices</u>. As members of NACAC, we will not be compensated by commissions, bonuses, or other incentive payments based on the number of students referred, recruited, admitted, or enrolled and will not offer or accept any reward or remuneration.