

## RECRUITING and COMPLIANCE

Office of Veteran & Military Student Services

## **Recruiting Policy**

Vaughn College is bound to follow a code of ethics, as related to the recruitment of all students, including Service members and their dependents.

Specifically, the College will ensure compliance with program integrity requirements consistent with the regulations issued by ED (34 C.F.R 668.71-668.75 and 668.14) related to restrictions on misrepresentation, recruitment, and payment of incentive compensation.

This applies to the educational institution itself and its agents including third party lead generators, marketing firms, or companies that own or operate the educational institutions.

As part of efforts to eliminate unfair, deceptive, and abusive marketing aimed at Service members Vaughn College will:

- 1. Ban inducements, including any gratuity, favor, discount, entertainment, hospitality, loan, transportation, lodging, meals, or other item having a monetary value of more than a de minimis amount, to any individual or entity, or its agents including third party lead generators or marketing firms other than salaries paid to employees or fees paid to contractors in conformity with all applicable laws for the purpose of securing enrollments of Service members or obtaining access to TA funds. Educational institution sponsored scholarships or grants and tuition reductions available to military students are permissible, and;
- 2. Refrain from providing any commission, bonus, or other incentive payment based directly or indirectly on securing enrollments or federal financial aid (including TA funds) to any persons or entities engaged in any student recruiting, admission activities, or making decisions

regarding the award of student financial assistance, and;

3. Refrain from high-pressure recruitment tactics such as making multiple unsolicited contacts (3 or more), including contacts by phone, email, or in-person, and engaging in same-day recruitment and registration for the purpose of securing Service member enrollments.