



Service-Related Recruitment

Policy Number: CU-EA-74

PURPOSE

Concord University has long adhered to a code of ethics related to the recruitment of all students and has never supported, condoned, nor used high-pressure recruitment tactics. This policy has been developed to codify and affirm the prohibition of high-pressure recruitment tactics to specifically includes Service members and their dependents.

SCOPE

This policy applies to Concord University, its employees, and its agents including third party lead generators or marketing firms.

POLICY

It is the policy of Concord University to ensure continuing and ongoing 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.

IMPLEMENTATION

The University continues to:

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.

Any violation of this policy may lead to disciplinary action, up to and including termination.

RESPONSIBILITY FOR IMPLEMENTATION

The Chief Enrollment Management Officer (CEMO) has primary responsibility for oversight and overseeing compliance with this policy. The CEMO may develop administrative processes, procedures, and/or forms for administering this policy.

AUTHORITY FOR INTERPRETATION

The final authority for interpretation of this policy rests with the President.

AMENDMENTS

This Policy may be amended to change names, links to information, and contact information without resorting to the rulemaking process.

Federal and State laws, rules and regulations change. Any portion of this policy and process document may be modified in practice to ensure the due process rights of the individuals involved are provided and to conform with any current Federal and State law, rules and regulations. Subject to the institution's rulemaking policy, the institution will change this policy to conform to the most current laws and regulations within a reasonable time of discovering the change.

REFERENCE

ED (34 C.F.R 668.71-668.75 and 668.14)

APPROVAL

Effective upon adoption by the Concord University Board of Governors.

Intent to Plan Approved by the CU Board of Governors: June 15, 2021

Emergency Adoption Approved by the Board of Governors: September 28, 2021

Approval by the Board of Governors: November 09, 2021

Effective Date: November 09, 2021