(POLICY)

Policy:	Ethical Recruitment of Students	Policy No.:	AA4004
Authority:	SUNY Broome Community College Board of Trustees		
Policy Owner:	President	Responsible Party:	VP Acad. Affairs
Approved:	August 19, 2021		
Revised:	(DATE)		

Purpose

To ensure SUNY Broome complies with the U.S. Department of Education (DOE) and U.S. Department of Defense (DOD) regulations that prohibit the College from misrepresenting the nature of its educational programs, financial charges, and ban the use of certain tactics to secure student enrollment (including but not limited to Veterans and Military Service Members) to the College.

Statement of the Policy

SUNY Broome follows a code of ethics related to the recruitment of all students, including Service Members and their dependents. SUNY Broome complies with the program integrity requirements consistent with the regulations issued by 34 C.F.R 668.71-668.75 and 668.14 related to restrictions on misrepresentation, recruitment, and payment of incentive compensation.

SUNY Broome, its agents, including third party lead generators, and marketing firms 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. Refrains 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. Refrains 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..

Related Policies (by number): TBD (Re-Admission Policy for Service Members)

To whom it applies (title or department) All Departments, Employees and Agents of SUNY Broome must comply with this policy

Definitions:

Misrepresentation: Any false, erroneous or misleading statement the institution, one of its representatives, or any other institution, organization, or person with whom the institution has an agreement to provide educational programs, or to provide marketing, advertising, recruiting or admissions services makes directly or indirectly to a student, prospective student or any member of the public. 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.

Statement: Is any communication made in writing, visually, orally, or through other means.

Misleading statement: Includes any statement that has the likelihood or tendency to deceive.

Prospective student: Any individual who has contacted SUNY Broome for the purpose of requesting information about enrolling at the institution or who has been contacted directly by the institution or indirectly through advertising about enrolling at the institution.

High-Pressure Tactics: Includes but is not limited to making three or more unsolicited contacts by phone, email, or in person or engaging in same-day recruitment and registration.

Military Service member: A member of the U.S. Army, Navy, Air Force, Marine Corps, Coast Guard, National Guard and their reserve components

Action (Created, Reviewed, Retired)	Date	Initials	Position Title
Created	06082021	LH	Director of Student Financial Services