



RECRUITER COMPENSATION/INCENTIVE PROGRAM POLICY

PURPOSE

Section 487(a)(20) of the Higher Education Act (HEA) prohibits colleges and universities from providing incentive compensation to employees or third party entities for their success in securing student enrollments or the awarding of Title IV HEA program funds and, by extension, Military Tuition Assistance funds.

STATEMENT OF POLICY

The University prohibits incentives, including any payment, gratuity, favor, discount, entertainment, hospitality, loan, transportation, lodging, meals, or other item having a monetary value, 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 domestic students or obtaining access to financial aid.

Providing any commission, bonus, or other incentive payment based directly or indirectly on securing enrollments or federal financial aid, including Military Tuition Assistance funds, to any persons or entities engaged in any student recruiting, admission activities, or making decisions regarding the award of student financial assistance is also prohibited.

In accordance with federal regulations, these restrictions do not apply to the recruitment of foreign students residing in foreign countries who are not eligible to receive federal student assistance.

Those involved in making decisions about compensation to any person or entity engaged in any student recruitment or admission activity, or in making decisions regarding the award of Title IV, HEA program funds, are responsible to ensure compensation is not based in any part, directly or indirectly, upon success in securing enrollments or the award of financial aid.

Employees and contractors acting on behalf of the University must refrain from offering or providing any inducements having a monetary value of more than a de minimis amount to any individual or entity for the purpose of securing enrollments of students or obtaining access to financial aid. Employees who violate this policy may be subject to disciplinary action, up to and including termination of employment. Contractors or other non-employee agents of the University, whether persons or entities, who violate this policy may be subject to actions including contract termination or nonrenewal, prohibition on acting as an agent of the University in the future, and/or any other actions the University deems appropriate.

POLICY TYPE: OPERATIONS