Recruiting, Marketing, & Advertising

Internal Policy 01.01

PURPOSE: The purpose of this Texas Tech University Health Sciences Center (TTUHSC) Veterans Resource Center (VRC) policy is to ensure the institution refrains from providing commission, bonuses, or other incentive payment directly or indirectly on securing enrollments or federal financial aid (including 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.

REVIEW: The policy will be reviewed by May 1 of each year by the HSC Veterans and Military Advisor/ School Certifying Official and the Assistant Provost for Student Affairs by May 15th.

POLICY/PROCEDURE

1. Policy.

Per DoD MOU paragraph 3.j., the institution will have policies in place compliant with program integrity requirements consistent with the regulations issued by ED [Department of Education] (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 their third party lead generators, marketing firms, or companies that own or operate the institutions. As part of efforts to eliminate unfair, deceptive, and abusive marketing aimed at service members, educational institutions will:

a. 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 [defined as “an insignificant 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;

b. 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 personas or entities engaged in any student recruiting, admission activities, or making decisions regarding the award of student financial assistance;

c. 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.