

# College Policy: Recruitment and Enrollment of Service Members

## I. **Scope and Purpose**

It is the policy of Chippewa Valley Technical College that its recruitment and enrollment activities are conducted in an ethical manner and comply with federal laws and regulations. Federal law, regulations, and/or the Department of Defense (DoD) Voluntary Education Partnership Memorandum of Understanding (MOU) prohibit the payment of incentive compensation for specified recruitment and enrollment activities as well as the use of certain Service member recruitment practices.

## II. **Definitions**

1. A "commission, bonus, or other incentive payment" means a sum of money or something of value, other than a fixed salary or wages, paid to or given to a person or an entity for services rendered.
2. "Securing enrollments or the award of financial aid" means activities that a person or entity engages in at any point in time through completion of an educational program for the purpose of the admission or matriculation of students for any period of time or the award of financial aid (including Tuition Assistance funds) to students. These activities include contact in any form with a prospective student, including, but not limited to contact through preadmission or advising activities; scheduling an appointment to visit the enrollment office or any other office of the institution; attendance at such an appointment; or involvement in a prospective student's signing of an enrollment agreement or financial aid application. These activities do not include making a payment to a third party for the provision of student contact information for prospective students provided that such payment is not based on: (1) Any additional conduct or action by the third party or the prospective students, such as participation in preadmission or advising activities, scheduling an appointment to visit the enrollment office or any other office of the institution or attendance at such an appointment, or the signing, or being involved in the signing, of a prospective student's enrollment agreement or financial aid application; or (2) The number of students (calculated at any point in time of an educational program) who apply for enrollment, are awarded financial aid, or are enrolled for any period of time, including through completion of an educational program.
3. "Entity or person engaged in any student recruitment or admission activity or in making decisions about the award of student financial assistance" means: (1) With respect to an entity engaged in any student recruitment or admission activity or in making decisions about the award of financial aid (including Tuition Assistance funds), any institution or organization that undertakes the recruiting or the admitting of students or that makes

decisions about and awards Title IV program funds or Tuition Assistance funds; and (2) With respect to a person engaged in any student recruitment or admission activity or in making decisions about the award of financial aid, any employee who undertakes recruiting or admitting of students or who makes decisions about and awards Title IV program funds or Tuition Assistance funds, and any higher level employee with responsibility for recruitment or admission of students, or making decisions about awarding Title IV program funds or Tuition Assistance funds.

4. "Enrollment" means the admission or matriculation of a student.
5. An "inducement" means any gratuity, favor, discount, entertainment, hospitality, loan, transportation, lodging, meals, or other item have a monetary value or more than a de minimis amount to any individual, entity, or its agents including third party lead generators or marketing firms.

### **III. Responsibilities**

In accordance with federal laws, regulations, and the DoD MOU, CVTC prohibits the payment of any commission, bonus, inducement, or other incentive payment based in any part, directly or indirectly, upon success in securing enrollments or awarding financial aid (including Tuition Assistance funds) to any persons or entities, engaged in any student recruiting, admission activities, decision-making regarding the award of student financial assistance. This prohibition shall also apply to third party contractors acting on CVTC's behalf.

CVTC employees and third-party contractors shall refrain from using high-pressure recruitment tactics, such as making multiple (three or more) unsolicited contacts by phone, email, or in-person. CVTC shall also refrain from engaging in same-day recruitment and registration for the purpose of securing Service member enrollments. Additionally, eligible Service members shall speak with their Educational Services Officer (ESO) or counselor within their Military Service to obtain approval to use Tuition Assistance funds prior to being enrolled at CVTC. This is to ensure that Service members understand their own eligibility for Tuition Assistance and their potential financial responsibility toward the school. Service members will be solely responsible for all tuition costs without this prior approval. This requirement does not prohibit an educational institution from pre-registering a Service member in a course to secure a slot in the course. If the school enrolls the Service member before the appropriate Service approves Military TA, then the Service member could be responsible for the tuition.

All Military TA must be requested and approved prior to the start date of the course. The Military TA is approved on a course-by-course basis and only for the specific course(s) and class dates that a Service member requests. If a military student "self-identifies" their eligibility and the Service has not approved the

funding, then the Service member will be solely responsible for all tuition costs, not the Service.

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