

# COLUMBIA COLLEGE HOLLYWOOD

## Marketing and Recruitment Policy Statement

### Introduction

Columbia College Hollywood (CCH) has drafted guidelines that promote high standards of integrity and service in student recruitment. These standards minimize risk for both CCH and staff members by providing guidance that helps to facilitate compliance with school policies and applicable federal regulations.

Consistent with these principles, CCH practices related to undergraduate outreach, recruitment and admissions will adhere to the guidelines explained in detail below. The office of the Vice President for Admissions is responsible for communicating these guidelines and will periodically review and update them, with consultation from other departments.

### Guiding Principle

As CCH strives to meet its enrollment goals, we always keep the educational interests of prospective students at the forefront of admissions and recruitment practices. CCH staff must always provide accurate information to assist prospective students in making informed application and enrollment decisions. This includes information about College admissions, costs and other information that will allow students to determine whether CCH is the right college for them.

CCH will abide by state and federal laws (e.g., confidentiality and incentive compensation) and College policies applicable to the outreach, recruitment and admission process.

### Content Areas

This document is grouped into the following general areas:

- A. Employee Relationships with Vendors
- B. College Relationships with Vendors and Other Partners
- C. Incentive Compensation
- D. Relationships with Student Placement Providers
- E. Unaffiliated Third Parties Charging for Admissions Assistance

#### **A. Employee Relationships with Vendors and Other Parties**

##### Description

CCH employees historically have interacted with vendors in a variety of contexts, including professional association meetings and industry conferences and through routine interactions related to outreach, recruitment and admissions. The continuing value of such interactions is the exchange of information to inform College decision-makers about the range of products and services available to both colleges and students, and to help vendors improve these products and services.

### Guideline

College recruitment and admissions staff should avoid the appearance of favoritism in all of their dealings on behalf of the College. The following recommendations apply:

1. All College recruitment and admissions officers and employees are expected to act with integrity and good judgment, and recognize that accepting personal gifts from those doing business or seeking to do business with the College, even when lawful, may give rise to legitimate concerns about favoritism depending on the circumstances.
2. College employees whose job responsibilities, directly or indirectly, involve outreach, recruitment or admissions are advised to complete annual undergraduate recruitment conflict of interest training.
3. To avoid any perceived conflict of interest if such gifts are accepted, this document discourages all College employees whose job responsibilities, directly or indirectly, involve outreach, recruitment or admissions, from receiving stipends or honoraria for providing informational outreach (such as a presentation to prospective students on the admission and selection process), regardless of amount.

## **B. College Relationships with Vendors and Other Parties**

### Description

CCH routinely engages the services of vendors such as Edcura Higher Education Services in order to efficiently and effectively fulfill the College's mission.

### Guideline

CCH relationships should conform to the highest standards of integrity, transparency, and service to students. Acceptance of the services, resources or other benefits from a vendor or for-profit party can help the College to achieve its goal of providing accurate information to prospective students. It is recommended that the College not accept any quid pro quo gifts (i.e., the promise of future business or other benefit in exchange for a gift) with potential vendors.

Admissions employees should be able to demonstrate that travel or other resources received from a vendor do not result in preferential consideration of that vendor in decision making. Even if acceptance of resources/complimentary items from a vendor does not violate a law, employees should remove themselves from any decision making associated with the particular vendor to avoid real or perceived conflicts of interest.

Relationships with non-profit entities whose primary mission is consistent with CCH's principles stated above are acceptable. Organizations, such as admissions professional associations (e.g., NACAC, WACAC) or academic preparatory programs that put the educational interests of the student first may be contracted with to provide information about the College and its admission requirements.

## C. Incentive Compensation

### Description

Title IV of the federal Higher Education Act of 1965 (HEA) regulates student financial assistance programs. The College's compliance with this law and implementing regulations protects billions of dollars in federal student aid awarded to students.

### Existing Regulations and College Policy

CCH employees may not receive incentive compensation for recruiting and enrolling students. Further, the College considers the applicability of other applicable rules, regulations, guidelines and the appearance of real and/or perceived conflicts of interest. It is the policy of CCH to comply with Title IV of the Higher Education Act. Regulations implementing Title IV of the HEA stipulate that an institution "will not provide any commission, bonus, or other incentive payment based in any part, directly or indirectly, upon success in securing enrollments or the award of financial aid, to any person or entity who is engaged in any student recruitment or admission activity, or in making decisions regarding the award of title IV, HEA program funds." ([34 CFR 668.14\(a\)22\(i\).](#))

### Guideline

All College entities should ensure that no incentive compensation is provided to CCH employees to recruit and enroll students. Regardless of their work title, any College employee who is involved in recruitment, enrollment, or financial aid-related activities is subject to this provision. CCH does not pay commissions or bonuses or merit pay to an employee based on recruitment or admissions responsibilities. We only compensate such staff in the form of a fixed salary. CCH management is responsible for ensuring that recruitment/admissions consulting or management firms engaged by the institution adhere to this guideline. A few examples are provided below:

#### *Example – Merit Increase or Performance Award for Recruitment Staff:*

A College employee encourages students to consider admission to a CCH degree program before an admission deadline. May this employee's merit increase be tied to the number of students he/she recruits? No. Based on the employee's job duties, the employee's compensation is subject to the ban on incentive compensation for covered recruitment activities. His or her merit increase, if any, must be based on standard evaluative factors that are independent of the number of students recruited, retained, or graduated. In addition to seniority or length of employment, standard evaluative factors may include factors such as job knowledge and professionalism, analytic ability, initiative in work improvement, clarity in communications, use and understanding of technology, and traits such as accuracy, thoroughness, dependability, punctuality, adaptability, peer rankings, student evaluations, and interpersonal relations.

#### *Example – Academic Tutoring for Enrolled Students:*

A College employee's job duties include tutoring students after they have been admitted and become eligible to receive a disbursement of financial aid, but before they have actually received financial aid or started classes. None of the academic support services provided by this employee fit the federal definition of recruitment or enrollment and thus are not subject to the

ban on incentive compensation.

*Example – Informational Outreach and Merit Increases:*

An employee's job involves posting general information online about available programs and application procedures and answers general questions about completing an application. The employee does an excellent job designing a website and received a monetary staff recognition award for the work. Is this permissible under the incentive compensation ban? Yes, the employee's activities are not considered recruitment and therefore are not subject to the federal incentive compensation ban.

#### **D. Relationships with Student Recruiting Providers**

##### Description

The practice of providing incentive compensation for domestic students is banned while the practice of providing incentive compensation in international recruitment is complex. Professional admissions organizations differ in their stance on the use of international recruitment agents. Proponents of the agent model argue that agents, paid via per-student commissions, can efficiently bring large numbers of international students to universities. Despite the controversy, many colleges in the United States contract with agents.

##### Guideline

CCH is committed to ensuring that third parties provide good services and accurate information and keep the best interests of students in mind. To this end, CCH discourages contracting with student placement providers or agents who have been accused of misrepresentation, or the provision of inaccurate information. College undergraduate outreach, recruitment and admissions staff should conduct due diligence to establish that potential vendors are reputable. Furthermore, staff should not work with providers or agents where substantial evidence exists that the provider currently engages in these practices. When it has been determined that the international recruiting firm has high standards of integrity and service in student recruitment, a small placement fee may be paid.

It is recommended that College employees not hire any vendors, agents or other non-College parties that charge students or parents more than a nominal fee for admissions information. It is recommended that employees or agents of vendors contracted by the College to interact with students through call centers, counseling, or other means not identify themselves as College employees, unless the term of the contract permits them to do so.

*Example – Name Purchase:*

The College contracts with a vendor to provide a list of names of students who have achieved a specified range of test scores. Can the contract include a formula based on the number of names? Yes. The ban on incentive compensation does not apply to the vendor or its employees because the services offered do not meet the federal definition of recruitment and therefore is not subject to the ban.

*Example – Donation:*

A parent donates money to CCH in the form of a charitable contribution and the parent has a son or daughter who is currently in the admissions pipeline. If a parent makes a donation to

CCH and the parent has identified a family member who has applied for admission, it is the policy of CCH to defer the donation until after the student's admission decision has been made.

### **E. Unaffiliated Third Parties Charging Students for College Admissions Assistance**

#### Description

Some international and domestic education companies sell services to prospective College applicants who might be able to get the desired information free of charge. For example:

- International recruitment agents charge students for admission information;
- A local school board invites an admissions representative to provide informational outreach. The admissions representative subsequently discovers that the event charges a fee to attendees;
- A private company charges prospective students for campus tours of CCH; and
- Private counselors charge for assisting with the application process.

#### Existing Regulations and College Policy

There are no existing regulations or College policies in this section.

#### Guideline

CCH's goal is to provide ample public advice to prospective students, thereby reducing the need for prospective students to rely on independent counselors or agents. CCH does not contract with any unaffiliated third party that charges students or parents more than a nominal fee for CCH admissions information, or whose subcontractors charge for such information.

#### *Example – Agent Seeks a Subcontract:*

An agent that charges each prospective student \$10,000 for their services seeks a subcontract with CCH. Can the College sign a contract with this agent? It is not recommended because the agent charges students more than a nominal fee for services. However, in order to maintain the quality of the information about College admissions, admissions staff members may provide information and materials that the agent can share with students.

## **Appendix B - Definition of Terms**

**Admissions:** anyone involved in the review, scoring and selection of applications.

**Conflict of Interest:** Situations in which financial or other personal considerations may compromise, or have the appearance of compromising an employee's professional judgment in administration, management, teaching, research and other professional activities. It is not necessarily a statement of wrongdoing.

**Gift:** Any object or payment that confers a personal benefit on the recipient where the recipient did not give anything of at least equal value in return for the gift. A gift includes a rebate or price discount unless the rebate or discount is made to the public generally.

**Marketing:** Marketing activities are not subject to incentive compensation, are generally broad in nature and do not involve making decisions on a specific candidate. Examples of marketing activities provided by the Department of Education include: broad information dissemination; advertising programs that disseminate information to groups of potential students; collecting contact information; screening pre-admission information to determine whether a prospective student meets the requirements that an institution has established for admission to an academic program; determining if an application is materially complete (as long as the admission decision remains with the institution).

**Outreach:** Public service work with a focus on preparing prospective students for admission to the CCH and how the admission and selection process works.

**Recruitment:** Examples of recruiting activities provided by the Department of Education include: targeted information dissemination to individuals; solicitations to individuals; contacting potential admission applicants (including via social media); aiding students in filling out admission application information.