UW-River Falls Administrative Policy Recruitment of Armed Forces Services Personnel

Policy ID: AP-01-127

Effective: September 1, 2020 Maintained by: Military/Veteran Student Services

Coordinator

Last Review: July 27, 2020 Approved by: Chancellor
Review: Every 3 years Next Review Date: July 1, 2023

Introduction

This policy prohibits certain practices in the recruitment of members of the armed forces who qualify for Tuition Assistance ("TA") benefits from the Department of Defense.

Authority

<u>Department of Defense Memorandum of Understanding between DoD Office of the USD (P&R) and UW-River Falls ("DOD-MOU")</u>

34 CFR 668.71 - 34 CFR 668.74

34 CFR 668.14

Wis. Stat. §19.41 et. seq., Code of Ethics for Public Officials and Employees

Chapter UWS 8, Wis. Admin. Code, Code of Ethics

Regent Policy Document 20-22 Code of Ethics

UWSA System Administrative Policy 171

NACAC's Code of Ethics and Professional Practices

Policy

The following shall define prohibited practices in the recruitment of prospective students who are current members of the U.S. Armed Forces. This policy supplements, but does not supersede, the authorities listed above.

A. Prohibited activities

Employees of University of Wisconsin River Falls ("University") and any agency, agent or third-party operating under a contract with the University are prohibited from the following activities in the recruitment of prospective students who are members of the U.S. Armed Forces ("Service members"):

- 1. Misrepresenting, in either written or verbal communication of any kind, the nature of the educational program, the financial charges or the employability of graduates;
- 2. Providing a commission, bonus, or other incentive, based in any part, directly or indirectly upon the success of securing enrollments of or awarding of financial aid to Service members or obtaining access to TA funds;
- 3. Providing an inducement of any more than a de minimis value to any individual or entity for the purpose of securing enrollments of Service members, except that institution sponsored scholarships, grants or tuition waivers to Service members are permissible.
- 4. Engaging in "high-pressure" recruitment tactics as defined in this policy;
- 5. Enrolling Service members in classes without their express consent; and

6. Enrolling Service members in new academic programs which lack accrediting agency approval.

B. Compliance with standards of conduct for public employees required

All university personnel, when engaged in the recruitment and retention of Service members, shall abide fully with the standards of conduct for public employees as defined under Wisconsin Statutes §19.41, Chapter UWS 8 and Regent Policy Document 20-22. These standards include a commitment to professional honesty and integrity, to avoid conflicts between personal interests and public responsibility to the University, and to not use their university position for personal gain.

C. Compliance with NACAC code of ethics and professional practices

UW River Falls is a member of the National Association for College Admission Counseling. As such, personnel tasked with the recruitment and admission of students shall follow the principles of the NACAC Code of Ethics and Professional Practice. These principles include a commitment to truthfulness, transparency, ethical professional conduct, and the protection of prospective and current student confidentiality.

D. Definitions

Commission, bonus or other incentive: A sum of money or something of value, other than a fixed salary, wage or contracted amount, paid or given to a person or entity involved in the recruitment of Service members for admission to a program offered by the institution, except that the institution may make merit-based adjustments to employee compensation provided that such payments are not based in any part on the success in securing enrollments of Service members.

High-pressure recruitment tactics: "High-pressure" recruitment tactics for the purpose of securing Service member enrollments include:

- making multiple unsolicited contacts (3 or more) by phone, email, text message or in-person;
- engaging in same-day recruitment, admission and registration; or
- other tactics designed to use fear, deception or emotional manipulation to pressure a prospective student to enroll in a program offered by the institution.

Inducement: Any gratuity, favor, discount, entertainment, hospitality, loan, transportation, lodging, meals or other item having a monetary value of more than a de minimis amount other than salaries paid to employees or fees paid to contractors in conformity with applicable law.

Misrepresentation: Any false, erroneous or misleading statement the institution, one of its representatives, or any person or entity with whom the institution has an agreement to provide recruiting and/or marketing services, makes directly or indirectly to a prospective and/or current student who is a Service member, with respect to any aspect of the educational program offered by the institution.

Securing enrollments: Inducing a prospective student to register for classes and incur charges for such classes.

Service member(s): A current member of the U.S. Armed Forces, consisting of the Army, Navy, Air Force, Marine Corps, Coast Guard, Space Force, National Guard and Reserve. Veterans are not considered Service members for purposes of this policy.

E. Complaints, Sanctions and Appeals Process

1. Complaints:

Alleged violations of this policy must be reported in writing to the Vice Chancellor for Business and Finance. https://www.uwrf.edu/Administration/ViceChancellor/SuggestionsBF.cfm. Complaints will be forwarded to Human Resources for investigation.

2. Resolution of complaints:

Alleged violations of this policy shall be investigated, adjudicated and sanctioned in accordance with UW River Falls Human Resources procedures for the investigation, adjudication and sanctioning of ethical violations.

3. Appeals:

Appeals of sanctions shall follow the UW River Falls Human Resources procedures for appeals according to the employee's classification of employment.