606 ETHICAL STANDARDS IN MARKETING AND RECRUITMENT

General Policy Statement

Warren County Community College (Warren) is committed to promoting fundamental fairness and transparency in its dealings as it pertains to all aspects of the enrollment process through ethical standards. For purposes of this Policy this includes lead generation, recruitment activities, admissions processing through matriculation, and related practices such as financial aid determinations and administration.

Ethical Standards in Securing Enrollment & Marketing Activities

Warren County Community College prohibits providing commissions, bonuses, or other incentive payments based directly or indirectly on securing enrollments at the college, or federal financial aid (including Tuition Assistance funds) to any person or entities engaged in any student recruiting, admission activities, or making decisions regarding the award of student financial assistance.

Warren also prohibits the offering or accepting of any reward or remuneration to influence an admission, scholarship, financial aid, or enrollment decision.

All claims in marketing materials will have verifiable references to substantiate any published statement, whether digital or print.

The primary ethical responsibility of all faculty and staff involved in the recruitment of prospective students is to advocate for students' best interest in the admissions process. Interactions with students should engender a high level of trust.

Ethical Standards in Recruitment

Warren County Community College treats students ethically, respectfully and professionally in the marketing, recruiting, admissions and financial aid process so that students can make informed enrollment decisions about matters such as enrollment and financial aid **without being subjected to high-pressure tactics from Warren or any related contractor or vendor, including but not limited to**:

- Falsely claiming that enrollment spots are limited or taking advantage of students' lack of understanding to pressure students to enroll;
- Pressuring students to make an immediate financial aid decision;
- Engaging in repeated unsolicited contact.

Warren will provide college admission counseling that puts students first by:

- Providing guidance and information to help students determine their best academic, personal, and financial college program match.
- Educate students and families of their ethical responsibilities in the admission process, including counseling students that it is unethical to plagiarize official documents or applications.
- Abstaining from the use of any high-pressure tactics, including making multiple unsolicited contacts (more than three a semester) and engaging in same-day recruitment and registration.

In this regard, Warren adheres to the following core principles:

1. All College employees shall abide by the College's Policy on Confidential Information and the Policy relating to the Family Educational Rights and Privacy Act (FERPA).

2. All College employees shall avoid conflicts of interest or the appearance of conflicts of interest when handling recruiting, admissions and financial aid of students and prospective students.

3. All recruiting, admissions and financial aid employees have appropriate education, job titles, and skills for their role and are overseen by Warren, which enforces a formal code of conduct for all such personnel; Warren also oversees any third-party contractors who provide recruiting, admissions and financial aid services and assures that any personnel who work with their students have similar education, skills and experience as personnel employed by Warren. Warren ensures that consistent, factual, and accurate information is available and that a high quality of service is provided. As applicable, Warren exercises oversight that ensures adherence to any regulations or other requirements governing recruiting activities.

4. Warren ensures that its recruiting, admissions, student services and financial aid personnel accurately describe the nature of their role including but not limited to prospective students, students, and community partners, and organizations.

5. Warren makes its policies related to consumer protection accessible and transparent. Information provided to students during any aspect of the enrollment process is accurate, complete and up-to-date and is provided to all students without any requirement that such students provide their contact information.

6. Warren promptly honors any request from a student to remove that student's name from phone, email or other contact lists. Student information collected through any aspect of the institution's enrollment processes is maintained and protected as outlined in the institution's data privacy policy, which must be prominently posted on Warren's website.

7. Warren recruiters, student services staff, financial aid personnel or appropriate third parties engaged in similar roles on Warren's behalf may answer questions about the student application process for admissions and financial aid, but in no case will such personnel complete applications for students without student permission or apply the signature of a student to an application. Warren will not enroll students at "external" events, to avoid even any appearance of high-pressure sales.

8. The enrollment agreement is limited to basic information about course of study, tuition and fees, and other related information. Any enrollment agreement shall not include language limiting a student's ability to: (1) file a complaint with an accreditor or state agency; (2) take legal action in the event that any dispute resolution processes agreed to by the institution and the student are unsuccessful in resolving the dispute to the satisfaction of the parties; or (3) seek to discharge a student loan through remedies available to borrowers under state or federal law. Students are provided sufficient time, as determined by the situation and any mandates in state law, to review any enrollment agreement and to consult with others as a part of that review process before being required to sign the document or related financial assistance.

9. Students have the right and responsibility to register for each academic term in which they are eligible to enroll. Warren does not automatically register any student in the next term without that student's affirmative consent to such registration or without providing the opportunity for the student to cancel that registration before the student is assessed tuition or fees for that term.

10. Prior to enrolling a student in a program or major, Warren ensures that the student has had sufficient time to review the College's policies and procedures; to understand the amount of federal, state and institutional financial aid the student is eligible to receive; to learn how

many credits previously earned, if any, will transfer and whether those transferred credits will be applied to requirements of the major or general education or the process; and to understand the timeline for evaluation of those credits.

11. Warren shall not induce or pressure a student to enroll by a specific deadline outside of the regular process of scholarship monies, institutional discounting, fee waivers, financial aid, other assistance or institution-branded gifts of nominal value.

12. In addition to a policy related to return of Title IV funds, Warren has a refund policy to assure that students receive a refund where appropriate if they withdraw from an academic term or from an institution according to policies set forth by the institution.

13. Warren does not otherwise engage in aggressive or deceptive recruitment tactics or conduct, such as may be defined and prohibited by federal regulations. This prohibition includes, but is not limited to, the following institutional acts or omissions:

    a. Obtaining students' contact information through websites that falsely claim to provide assistance with finding employment or obtaining government benefits;

    b. Discouraging students from consulting with parties unrelated to the institution prior to finalizing their enrollment decision;

    c. Failing to timely respond to students' requests for additional substantive information related to enrollment or loan obligations.

14. Warren shall not use threatening, abusive, or manipulative language to influence a student's decision.

15. Warren shall review any allegation of a violation of this Policy. Any employee or contractor found to violate this Policy may be subject to disciplinary action or termination of contract (for contractors).

16. Warren maintains and celebrates its open admission process. Noting that some degrees (e.g., nursing) are selective based on merit, the marketing and recruitment ethics at Warren are designed to be universal for all degrees, selective or not.

17. In accordance with Policy 301.1, no student with an ability to benefit will be denied admission to Warren County Community College.

Approved 05/17/25