

Roger Williams University Policy Concerning the Recruitment and Enrollment of Service Members Under the United States Department of Defense Voluntary Education Partnership Program

Roger Williams University (“University” or “RWU”) is committed to conducting its recruitment and enrollment activities in a manner that is fully compliant with the U.S. Department of Education’s “program integrity” regulations (34 CFR 668.71-668.75 and 668.14), as well as with requirements outlined within the United States Department of Defense (DoD) Voluntary Education Partnership Memorandum of Understanding (MOU), that are intended to prevent and eliminate fraudulent and aggressive recruitment of students (including but not limited to veterans and Military Service members).

This statement outlines the University’s policies for maintaining such compliance. Specifically, RWU prohibits:

- 1.) 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 Department of Defense Tuition Assistance Program (“TAP”) 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 RWU’s behalf;
- 2.) the use high-pressure recruitment tactics, such as making multiple (three or more) unsolicited contacts by phone, email, or in-person; and,
- 3.) engaging in same-day recruitment and registration for the purpose of securing Service member enrollments.

These prohibitions apply to the University itself, as well as to its employees and its agents, including third party lead generators, marketing firms, or other entities involved in securing enrollments or awarding financial aid.

For purposes of interpreting, administering and enforcing this policy:

- 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 TAP funds) to students. Such 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.
- 3.) "Entity or person engaged in any student recruitment or admission activity or in making decisions about the award of student financial assistance" means: a.) any institution or organization that undertakes the TAP funds; or any employee who undertakes recruiting or admitting of students or who makes decisions about and awards Title IV program funds or TAP funds, and any higher level employee with responsibility for recruitment or admission of students, or making decisions about awarding Title IV program funds or TAP 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.

Approved by President's Cabinet, May 28, 2020