Standards of Good Practice for Servicemembers Opportunity Colleges

- 1. Communications with military members are clear, comprehensive, and completely truthful. Specifically, an institutional representative:
 - a. provides information on program requirements, course descriptions, tuition and related costs, schedules, and course delivery formats prior to the collection of personal contact information:
 - b. provides accurate and complete information to prospective students on accreditation status and what programs are covered;
 - c. clearly and truthfully presents prospective students with the prospects for academic degree or credit acceptance;
 - d. accurately describes occupational opportunities for program graduates;
 - e. accurately describes any partnerships with military or government agencies or endorsements or testimonials used in promotional actions; and
 - f. provides *bona fide* scholarship information that is unambiguously separate and distinct from any federal monies.
- 2. Enrollment and recruitment policies are appropriate to a higher education institution. Specifically, an institution will be held accountable for all recruitment and enrollment actions whether conducted by staff, faculty, partners, or other third party agents acting on the institution's behalf. The institution should:
 - a. primarily emphasize educational programs and services in all advertisements, promotional literature, and recruiting activities;
 - b. develop and use promotional and recruitment materials and practices that are ethical in every respect toward military members; promotional materials should not have the capacity to mislead or coerce students into enrolling;
 - c. establish legitimate enrollment deadlines, and *bona fide* scholarships and grants based on published criteria, and refrain from promotional tuition discounts that do not serve the best interest of the military or its members;
 - d. refrain from exerting undue pressure to enroll through follow-up calls or other forms of personal contact;
 - e. refrain from marketing/recruiting practices in which ancillary technology devices (laptops, printers, electronic readers, etc.) are offered as <u>inducements to enroll in an educational program</u>. Any conditions for receiving such an inducement must be readily

- achievable by the military student and must not pose significant financial hardship or undue burden for receipt;
- f. perform telemarketing in accordance with the Federal Trade Commission and other state and federal regulations; and
- g. follow Department of Defense and military service guidance governing installation access and the use of retiree/dependent ID cards; retiree/dependent ID cards should not be used to gain base access for business purposes. All education-related activities on an installation or at an armory should be routed through the education center or Education Services Officer for authorization.
- 3. Fees charged to military members are clear and do not give a false, or misleading impression about the costs to either the military member or the military service. Specifically, an institution:
 - a. provides prospective students with a clear understanding of the total financial obligation they have undertaken by engaging in specific academic pursuits. Information provided in catalogs, Web sites, and other media outlets should include the following minimum, clearly defined, financial information: cost of admissions, tuition (including the cost of instruction and associated fees), all mandatory fees, and the estimated cost of instructional materials:
 - b. agrees that the total cost of a program is the same for military members as that charged to any other student, except for legitimate military enrollment discounts that may apply;
 - c. applies military discounts to all servicemembers uniformly and equitably without restrictions unless further defined by specific contract requirements;
 - d. avoids the words "free" or "at no cost" to describe any item or service that is regularly included as a part of the institution's program or services. These words should not be used to describe educational funding paid for with Department of Defense tuition assistance or Department of Veterans Affairs educational benefits due to the student obligation for government reimbursement in the event of unsuccessful course completion. The word "guarantee" is not used at all in promotional literature;
 - e. makes clear through a full explanation of what an electronic signature and online enrollment mean and the commitments they represent. There are personnel support and resources available for students who are unsure of what they may be signing and require additional explanation;
 - f. refrains from compensating or offering significant incentives or products to military members for providing referrals or directly influencing military students to attend a specific school; and

- g. confirms that students have read and acknowledged their personal financial obligations and refund protections before they submit their registration.
- 4. Admissions policies and practices ensure appropriate academic screening and proper placement in courses and programs. Specifically, an institution:
 - a. clearly states if any course or program prerequisites are needed for successful assimilation of the academic materials;
 - b. determines that students have the qualifications necessary to successfully enroll in a course or program, including most commonly a high school diploma or legitimate equivalent;
 - c. avoids an automatic renewal or continuous enrollment process with any courses or programs; and
 - d. clearly states a cooling-off or withdrawal period in which the student incurs no financial obligation for course enrollment.
- 5. Among the student services provided, there is a clearly defined process that includes a point-of-contact and a phone number for military/veteran students to communicate grievances and/or to discuss enrollment, instruction, and student service concerns/issues.
- 6. For institutions for which they apply, adhere to the <u>Title 16 Commercial Practices</u> requirements in Chapter I FEDERAL TRADE COMMISSION, Part 254. For-profit institutions should adhere to those standards when providing education courses and programs to servicemembers.
- 7. In addition, the <u>spirit of TITLE 16 Commercial Practices, CHAPTER I SUBCHAPTER D Part 429</u> "rule concerning a cooling-off period for sales…" applies to SOC Standards of Good Practice regarding financial commitments for academic coursework or programs. In terms of a cooling off period for financial/business transactions with servicemembers:
 - a. There should be a clearly stated period after enrollment in coursework or an academic program during which a student may withdraw the commitment and all financial liability. Said withdrawal period should comply with established state regulations.
 - b. The process for withdrawal from the commitment must be communicated clearly and plainly, in writing, without any misrepresentation.
 - c. The institution is required to establish and honor a formal, printed prorated tuition refund policy that is consistent with its drop/add policies for students who withdraw from course enrollment after the 100% financial refund deadline.