



UNIVERSITY *of* HAWAII®
MAUI COLLEGE

UHMC Recruiting, Marketing, and Advertising Guidelines

6 September 2022

I. Purpose.

The purpose of the UHMC Recruiting, Marketing, and Advertising Guidelines is to: promote and maintain high standards of integrity and service in student recruitment (including, but not limited to, Military Service member student recruitment); minimize risk for the campus and its staff by providing guidance; and ensure compliance with University policy and applicable federal and state regulations. The Guidelines address the legal and ethical treatment of students with regard to UHMC recruiting, marketing, and advertising efforts.

II. Definitions.

- 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.
- b. DoD MOU means the Department of Defense Voluntary Education Partnership Memorandum of Understanding (MOU) Between DoD Office of the Under Secretary of Defense for Personnel and Readiness (USD(P&R)) and University of Hawai'i Maui College, for the term October 7, 2019 – October 2, 2024.
- c. DoDI means Department of Defense Instruction.
- d. ESO means Educational Services Officer.
- e. 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 to students.

III. Policy.

a. Guiding Principles.

As UHMC pursues its enrollment goals, UHMC will keep the educational interests of the state, prospective students, and the University at the forefront of recruiting, marketing, and advertising practices. UHMC will provide accurate information to assist prospective students in making informed application and enrollment decisions. This includes information about University admissions, costs and other information that will allow students to determine whether enrollment at UHMC is appropriate for them. UHMC will abide by federal and state laws and regulations and University policy applicable to student recruiting, marketing, and advertising.

b. Unfair, Deceptive, and Abusive Recruiting Practices.

Department of Defense Instruction (DoDI) 1322.25, pertaining to Voluntary Education Programs, states, at paragraph 1.c.(1)(b): "All educational institutions providing education programs through the DoD Tuition Assistance (TA) Program will not use unfair, deceptive, and abusive recruiting practices."

In accordance with DoDI 1322.25, UHMC and its employees shall not use, in the UHMC website, Catalog, or in any promotional, advertising, or recruitment materials, any depictions of Service members in uniform with their rank and/or

other insignia visible that could be inferred as a Military Service endorsement of UHMC. The seals of the Department of Defense and Military Services and the trademarks of the Military Services shall not be used by UHMC without prior written permission of the Military Service Trademark Licensing Program Office.

c. Incentive Compensation.

UHMC will comply with Title IV of the Higher Education Act and its implementing regulations, including 34 CFR 668.14(b)(22)(i), which states, in part 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.”

Paragraph 3.j.(2) of the DoD MOU states that institutions are to: “Refrain from providing any commission, bonus, or other incentive payment based directly or indirectly on securing enrollments or federal financial aid (including TA funds) to any persons or entities engaged in any student recruiting, admission activities, or making decisions regarding the award of student financial assistance.”

In accordance with Title IV, 34 CFR 668.14(b)(22)(i), and paragraph 3.j.(2) of the DoD MOU, no incentive compensation shall be provided to UHMC employees or contractors to recruit and enroll students. UHMC shall not pay commissions or bonuses or merit pay to any employee based on success in securing recruitment or the award of financial aid. UHMC management shall be responsible for ensuring that any recruitment or admissions consulting or management firms engaged by the institution adhere to this guideline. Pursuant to 34 CFR 668.14(b)(22)(i)(A), the restrictions set forth in 34 CFR 668.14(b)(22) do not, however, apply to the recruitment of foreign students residing in foreign countries who are not eligible to receive Federal financial assistance.

d. High-Pressure Recruitment Tactics.

Paragraph 3.j.(3) of the DoD MOU states that institutions are to: “Refrain from high-pressure recruitment tactics such as making multiple unsolicited contacts (3 or more), including contacts by phone, email, or in-person, and engaging in same-day recruitment and registration for the purpose of securing Service member enrollments.”

In accordance with paragraph 3.j.(3) of the DoD MOU, UHMC and its employees shall not engage in high-pressure recruitment tactics such as making multiple unsolicited contacts (3 or more), including contacts by phone, email, or in-person, and engaging in same-day recruitment and registration for the purpose of securing Service member enrollments.

e. **Enrollment of Service Members.**

Paragraph 4.d.(1) of the DoD MOU states: "If an eligible Service member decides to use Tuition Assistance (TA), educational institutions will enroll him or her only after the TA is approved by the individual's Service. ...This requirement does not prohibit an educational institution from pre-registering a Service member in a course in order to secure a slot in the course."

In accordance with the DoD MOU, UHMC and its employees shall direct eligible Service members to receive approval from an Educational Services Officer (ESO) or counselor within the Military Service prior to enrolling.

IV. **Delegation of Authority.**

The Vice Chancellor of Student Affairs is delegated the authority and responsibility to ensure campus compliance with these Guidelines.

V. **Contact Information.**

- a. Vice Chancellor of Student Affairs, email: vohies@hawaii.edu; phone: 808-984-3272.
- b. Admissions, email: fmora@hawaii.edu; phone: 808-984-3517.
- c. Financial Aid Director, email: davileig@hawaii.edu; phone: 808-984-3519.

VI. **References.**

- a. Federal laws, rules and regulations:
 - i. Title IV of the Higher Education Act of 1965, as amended (20 USC § 1070, et seq.)
 - ii. 34 CFR § 668.14 (Program participation agreement).
 - iii. Department of Defense Instruction 1322.25.
- b. Department of Defense Voluntary Education Partnership Memorandum of Understanding (MOU) Between DoD Office of the Under Secretary of Defense for Personnel and Readiness (USD(P&R)) and University of Hawai'i Maui College, for the term October 7, 2019 – October 2, 2024.

Approved:



Lui K. Hokoana
Chancellor

1/6/22

Date