University of Detroit Mercy Ethical Recruiting, Admissions,

Financial Aid & Enrollment Practices Policy

Effective Date: September 1, 2026
Responsible Office: Enrollment Management: Recruitment & Financial Aid
Policy Owner: Vice President for Enrollment & Student Affairs
Approved By: President/President's Cabinet September 1, 2026
Review Cycle: Annual

1. Purpose

University of Detroit Mercy is committed to conducting recruiting, admissions, financial aid, marketing, and enrollment activities with integrity, transparency, accuracy, fairness, and respect for students.

This policy establishes ethical standards and procedures governing employees, representatives, and third-party contractors who participate in or support communications with prospective and current students. The policy is intended to ensure that the Institution's enrollment practices are consistent with applicable federal and state laws and regulations, Higher Learning Commission (HLC) requirements, and institutional policies.

The Institution will provide accurate and complete information to students and will not use deceptive, misleading, coercive, or high-pressure practices to influence enrollment decisions.

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2. Scope

This policy applies to all Institution employees, volunteers, student employees, and representatives who participate in recruiting, admissions, financial aid, marketing, advertising, enrollment, or other activities involving direct communication with prospective or current students.

This includes, but is not limited to:

- Admissions and recruitment personnel;
- Student Affairs personnel;
- Financial aid personnel;
- Marketing and communications personnel;
- Academic program representatives involved in recruitment;
- Coaches and athletics personnel engaged in recruitment;
- Faculty and staff who communicate with prospective students regarding enrollment;
- Student ambassadors and other student representatives;

- Third-party contractors, agents, consultants, vendors, and other representatives acting on behalf of the Institution.

The Institution remains responsible for the ethical conduct of third parties performing covered activities on its behalf.

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3. General Ethical Standards

All covered individuals and organizations shall:

1. Act honestly, professionally, and in the best interests of students.
2. Provide information that is accurate, current, complete, and not misleading.
3. Clearly distinguish factual information from opinions or estimates.
4. Accurately represent the Institution's programs, credentials, accreditation, admissions requirements, costs, financial aid, transfer policies, student services, completion expectations, and other material information.
5. Respect a prospective or current student's right to make an informed enrollment decision.
6. Protect the confidentiality and privacy of student and prospective-student information.
7. Comply with applicable federal and state laws and regulations and institutional policies.
8. Avoid actual or perceived conflicts of interest.
9. Use institutional resources, communications systems, and student information only for authorized purposes.
10. Treat prospective and current students fairly and respectfully without discrimination, harassment, intimidation, or retaliation.
11. Accurately identify and describe their institutional role and authority when communicating with prospective or current students.
12. Personnel engaged in recruiting, admissions, and financial aid activities shall have education, skills, experience, and job responsibilities appropriate to their roles. Third-party personnel performing comparable functions will possess qualifications appropriate to the services they provide.
13. The Institution's public representations must be accurate and complete.

4. Recruiting and Admissions Practices

Employees and representatives involved in recruitment and admissions shall not:

- Make false, deceptive, inaccurate, or misleading statements about the Institution or its programs;
- Misrepresent accreditation, authorization, licensure, program availability, program requirements, transferability of credits, costs, financial aid, employment opportunities, completion expectations, or student outcomes;
- Guarantee admission, employment, financial aid, scholarships, transfer credit, licensure, certification, or other outcomes unless the Institution has formally authorized such a guarantee;
- Engage in coercive or high-pressure tactics intended to improperly influence a student's enrollment decision;
- Discourage a student from considering other educational institutions through deceptive or disparaging statements;
- Misrepresent the urgency or availability of an academic program, scholarship, financial aid, or enrollment opportunity;
- Induce or pressure a student to enroll by a specific deadline through scholarship funds, institutional discounts, fee waivers, financial aid, other assistance, or institution-branded gifts, except as part of the Institution's regular processes and practice;
- • Discourage prospective students from consulting with family members, advisors, other institutions, or other persons outside the Institution before making an enrollment decision or commitment
- Complete or submit an application, agreement, financial aid document, or other student document on behalf of a student except as specifically authorized by law and institutional procedure;
- Encourage students to provide inaccurate or incomplete information on applications or other documents;
- Alter or manipulate student information for recruitment or enrollment purposes; or
- Continue communications with an individual who has appropriately requested that communications cease.

Recruiting personnel should provide students with sufficient information to make informed decisions and should direct students to authoritative institutional sources when questions involve matters outside the recruiter's area of responsibility.

Prior to enrollment, students shall have sufficient opportunity to review applicable institutional policies and procedures; understand the financial aid for which they are eligible; and understand applicable transfer-credit policies, including the process and timeline for evaluation of previously earned credit and, when determined, how accepted credits apply to program or general education requirements.

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5. Financial Aid Practices

Financial aid personnel and other employees communicating financial aid information shall:

- Provide accurate information regarding eligibility, application requirements, deadlines, awards, costs, refunds, and student responsibilities;
- Clearly distinguish grants and scholarships from loans;
- Explain applicable borrowing obligations and consequences when required;
- Avoid guaranteeing financial aid before eligibility has been determined;
- Protect student financial and personally identifiable information;
- Follow institutional financial aid procedures and applicable federal and state requirements; and
- Refer students to appropriately qualified financial aid personnel when questions exceed the employee's authority or expertise.

Financial aid information shall not be used as a means of misleading or coercing a student into enrolling.

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6. Marketing and Advertising

All marketing and advertising directed toward prospective or current students shall be truthful, accurate, supportable, and consistent with approved institutional information.

Material information necessary for prospective students to make informed enrollment decisions shall be publicly accessible without requiring individuals to provide contact information.

Marketing materials shall not:

- Make unsupported claims regarding employment, salary, career outcomes, program quality, accreditation, rankings, or student success;
- Present outdated information as current;
- Omit material information in a manner that makes an otherwise technically accurate statement misleading;
- Misrepresent program costs or financial aid;
- Imply institutional authorization, accreditation, or licensure that does not exist; or
- Use testimonials, statistics, rankings, or other claims in a misleading manner.

Responsible departments shall establish procedures for reviewing and approving recruitment and enrollment materials before publication.

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7. Third-Party Contractors and Representatives

The Institution may engage third-party contractors, agents, consultants, or vendors to support recruitment, admissions, marketing, financial aid, or enrollment activities.

Before a third party performs covered services, the Institution department responsible shall ensure that an appropriate written agreement is in place.

As applicable, agreements shall require the third party to:

1. Comply with this policy and applicable institutional procedures;
2. Comply with applicable federal and state laws and regulations;
3. Provide accurate and truthful information to students;
4. Protect student and prospective-student information;
5. Complete Institution-required training before performing covered services;
6. Maintain appropriate records of required training;
7. Cooperate with Institution monitoring, audits, and investigations;
8. Promptly report suspected violations;
9. Correct inaccurate or misleading information when identified; and
10. Permit the Institution to suspend or terminate activities when serious or repeated violations occur.

The Institution will maintain appropriate oversight of third-party activities. Oversight may include training, periodic review, contract monitoring, review of communications, complaint analysis, performance reports, audits, or other appropriate measures.

The Institution's use of a third party does not relieve the Institution of responsibility for activities conducted on its behalf.

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8. Required Training

The Institution shall provide training appropriate to the responsibilities of personnel covered by this policy.

A. Initial Training

Employees and representatives shall complete required training before independently performing covered recruiting, admissions, financial aid, marketing, or enrollment activities, or as soon thereafter as operational circumstances require.

Initial training shall address:

- This policy and the Institution's code of conduct;
- HLC requirements;
- Applicable federal and state requirements;
- Accurate representation of institutional programs and costs;
- Financial aid practices;
- Student privacy and confidentiality;
- Appropriate recruiting and communication practices;
- Prohibited conduct;
- Complaint and reporting procedures; and
- Responsibilities of third-party representatives.

B. Annual Training

Covered personnel shall complete refresher training **at least annually**.

Annual training shall address changes in applicable law, regulation, HLC requirements, institutional policy, enrollment procedures, or other matters relevant to the employee's responsibilities.

C. Additional Training

The Institution may require additional training when:

- Regulations or institutional policies change;
- Monitoring identifies a compliance concern;
- A complaint indicates a potential training deficiency;
- An employee changes responsibilities;
- A third-party contractor begins providing covered services; or
- A supervisor determines additional training is necessary.

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9. Training Documentation

The Institution shall maintain documentation demonstrating completion of required training.

Documentation may include:

- Employee name and position;
- Training date;
- Training subject matter;
- Training materials;
- Trainer or responsible department;
- Completion status;
- Assessment or acknowledgment, when applicable; and
- Remedial training or follow-up activities.

Responsible departments shall monitor completion of required training and follow up with individuals who fail to complete training by the established deadline.

Training records shall be retained in accordance with the Institution's applicable records-retention schedule.

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10. Monitoring and Compliance

Responsible offices shall establish processes for monitoring compliance with this policy.

Monitoring may include:

- Annual review of recruitment and admissions practices;
- Review of recruitment and marketing materials;
- Training completion reports;
- Review of student complaints and concerns;
- Review of third-party contractor performance;
- Periodic audits of enrollment practices;
- Review of communications with prospective students;
- Review of financial aid communications; and
- Other compliance reviews based on institutional risk.

Results of monitoring shall be communicated to appropriate leadership. Where deficiencies are identified, the office responsible shall establish corrective action appropriate to the nature and severity of the concern.

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11. Complaints and Reporting

Prospective and current students, employees, contractors, and other individuals may report suspected violations of this policy through the Institution's established complaint or reporting processes.

Reports may concern, among other matters:

- Misleading or inaccurate recruitment information;
- Improper financial aid representations;
- High-pressure or coercive recruitment practices;
- Privacy concerns;
- Misconduct by an employee or contractor;

- Improper handling of an application or enrollment document; or
- Other conduct inconsistent with this policy.

The Institution shall maintain a process for receiving, reviewing, documenting, and responding to complaints in a timely manner.

Complaints shall be referred to the appropriate institutional office based on their nature and applicable institutional procedures.

The Institution shall not retaliate against an individual who, in good faith, reports a concern or participates in an investigation.

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12. Investigation and Corrective Action

When the Institution receives credible information suggesting that this policy may have been violated, the appropriate institutional office shall determine whether further review or investigation is warranted.

Depending on the circumstances, corrective action may include:

- Clarification or correction of information provided to students;
- Additional training;
- Written counseling or corrective instruction;
- Increased monitoring;
- Removal from recruiting or enrollment responsibilities;
- Disciplinary action consistent with applicable institutional policy;
- Corrective action under a third-party contract;
- Suspension of a contractor's activities; or
- Termination of a third-party relationship.

The Institution shall maintain appropriate documentation of significant compliance concerns, investigations, and corrective actions in accordance with applicable records-retention requirements.

13. Responsibilities

President

Provides executive oversight and ensures institutional commitment to ethical enrollment practices.

Vice President for Enrollment & Student Affairs

Provides operational oversight of recruiting, admissions, enrollment, and related compliance activities.

Director of Scholarship and Financial Aid

Ensures appropriate training, procedures, monitoring, and compliance within financial aid operations.

Associate Vice President for Marketing & Communications

Ensure recruitment and advertising materials are accurate and appropriately reviewed.

Supervisors

Ensure employees complete required training, understand applicable procedures, and comply with this policy.

Employees and Representatives

Are responsible for understanding and following this policy and reporting suspected violations.

Procurement/Contract Management

Ensures applicable third-party agreements include appropriate compliance requirements.

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14. Records and Evidence of Compliance

The Institution shall maintain sufficient evidence to demonstrate implementation of this policy. Such evidence may include:

- Current policy and code of conduct;
- Training materials;
- Annual training schedules;
- Training completion records;
- New-hire training records;

- Third-party contracts and agreements;
- Third-party training records;
- Monitoring and audit records;
- Recruitment and marketing review records;
- Student complaint records;
- Corrective action documentation; and
- Periodic compliance reports to institutional leadership.

These records shall be made available to authorized institutional officials and, when appropriate, accrediting, or governmental agencies.

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15. Review and Revision

This policy shall be reviewed annually and revised as necessary to reflect changes in applicable laws, regulations, HLC requirements, institutional practices, or identified compliance risks.

The Enrollment Management Office will coordinate revisions with appropriate offices, including General Counsel/Compliance/Human Resources/Financial Aid/Enrollment Management as applicable.