



Policy Name:	Policy Relating to Ethical Recruiting, Marketing and Advertising Practices		
Associated Form(s)/ Documents:	NACAC Guide	Policy Number:	2024-7
Reviewed:	Non-Academic Policy Committee	Approved:	April 29, 2024
Approval Authority:	President <i>Susan Parish</i>	Adopted:	May 10, 2024
Responsible Executive(s):	Vice President for Enrollment Management	Revised:	N/A
Responsible Office(s):	Enrollment Management	Contact(s):	Assistant Vice President, Financial Aid

I. Policy Statement

Mercy University is committed to promoting fundamental fairness and transparency in its dealings as pertains to all aspects of the enrollment process. For purposes of this Policy this includes lead generation, recruiting activities, admissions processing through matriculation, and related practices such as financial aid determinations and administration. In addition to the policies set forth herein, the University also abides by all provisions of the National Association of College Admissions Counseling (NACAC)'s *Guide to Ethical Practice in College Admission*.

II. Ethical Standards in Securing Enrollments

Mercy University prohibits providing commissions, bonuses, or other incentive payments based directly or indirectly on securing enrollments at the University, 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.

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

III. Ethical Standards in Recruitment

Mercy University 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 Mercy or a related contractor, 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.

Additionally, Mercy adheres to the following principles:

1. All University employees shall abide by the University's Policy on Confidential Information and the Policy relating to the Family Educational Rights and Privacy Act (FERPA).
2. All University 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 Mercy, which enforces a formal code of conduct for all such personnel; Mercy 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 Mercy. Mercy ensures that consistent and accurate information is available and that a high quality of service is provided. As applicable, Mercy exercises oversight that ensures adherence to any regulations or other requirements governing recruiting activities in particular areas, such as athletics.

4. Mercy ensures that its recruiting, admissions 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. Mercy 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. Mercy 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 Mercy's website.
7. Mercy complies with expectations related to the publication of student achievement data as outlined in the consumer information report: <https://www.mercy.edu/about/consumer-information>.
8. Mercy recruiters, admissions officers, financial aid officers or appropriate third parties engaged in similar roles on Mercy'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.
9. 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 lose an offer of admission and related financial assistance.

10. Students have the right and responsibility to register for each academic term in which they are eligible to enroll. Mercy 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.
11. Prior to enrolling a student in a program or major, Mercy ensures that the student has had sufficient time to review the University'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.
12. Mercy 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.
13. In addition to a policy related to return of Title IV funds, Mercy 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.
14. Mercy 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 decisions or commitments;
 - c. Failing to timely respond to students' requests for additional substantive information related to enrollment or loan obligations.
15. Mercy shall not use threatening, abusive, or manipulative language to influence a student's decision.
16. Mercy 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).