

COMPLIANCE CHECKLIST

Nine Things Higher Education Institutions Should Consider When Addressing Program Integrity Compliance

- 
Have you appointed a contact person responsible for approving content?
 Every school should have a clear approvals workflow process in place with one designated point of contact for the school/institution. This individual should be responsible for providing written approval for any advertising, recruiting or marketing content.
- 
Do you have a place where approved marketing materials can be stored and accessed?
 One of the easiest ways to ensure that your brand is not misrepresented is to create a single repository where you can store pre-approved language and content for use in marketing materials. By providing access to this content to your inquiry vendors, you can also reduce the time and effort required for the approval process.
- 
Have you requested that your call center, inquiry generation, and other marketing vendors explain and describe how they are implementing compliance best practices?
 It is important that your third-party marketing vendors understand the impact of recent regulations. All your vendors should have a clear explanation for how they are addressing these concerns. For example, any call centers that you are working with should be recording, and randomly checking, calls for quality compliance.
- 
Have you created and distributed a list of banned practices?
 It's important to create a list of inquiry practices that are unacceptable to your institution, and have your vendors sign an agreement promising not to employ any of those practices (including ramifications for violating the agreement) . Examples of practices to consider banning might include using blind links, offering prospects an incentive to click on a link or complete a form, masking or using bots or other automated means to generate inquiries.
- 
Have you updated your legal contracts/vendor agreements?
 Update your legal agreements with every vendor that represents your school to ensure the guidelines above are being followed. The language in the agreements should make it clear that any sub-vendor is also responsible for agreeing to the requirements outlined.
- 
Have you posted Gainful Employment Disclosures for all programs?
 Ensure that your all program-specific promotional materials, both online and offline (including web pages, landing pages, brochures, radio, & TV) are updated to include all five gainful employment disclosures (see CUnet's Guide to Gainful Employment Disclosure).
- 
Have you set up a net price calculator on your website?
 Every school needs to have a net price calculator posted on their website by October 29, 2011. A Net Price Calculator Quick Start Guide is available online at <http://nces.ed.gov/ipeds/netpricecalculator/>. This tool walks you through the basic steps required to configure and host a customized version on your institution's website.
- 
Do you have compliance monitoring in place?
 Every school should have a plan in place to monitor compliance. This may include using software, manual reviews, or a solution like *CUnet Enforce* which combines manual monitoring with leading technology in a fully managed offering.
- 
Have your staff and vendors completed compliance training?
 Schools should set up and enforce mandatory compliance training for both internal employees and third-party vendors involved in marketing or advertising activities on behalf of the institution.

461 From Road

Suite 200

Paramus, NJ 07652

1200 Scottsville Road

Suite 410

Rochester, NY 14624

www.CUnet.com

LEGAL DISCLAIMER: *These materials have been prepared for informational purposes only. Any information in this document is not intended to be, nor does it constitute, legal advice. This document includes details on the regulations provided by the Department of Education affecting Private, For Profit Career Schools, as understood by CUnet at the time of writing. While care has been taken to ensure the accuracy of the information included, no guarantee can be given that the information provided in this document is correct, complete, and/or up-to-date. CUnet is not responsible for any loss, damage, cost or expense incurred as a result of any error, omission or misrepresentation in relation to this document.*