



ADMINISTRATIVE POLICY Misrepresentation

Policy Contents

Required

- Policy Statement
- Reason for Policy
- Responsibilities
- History
- Additional Contacts

Optional

- Procedures
- Definitions
- Related Information
- Appendices

Effective Date: September, 2013

Last Updated: September, 2013

Responsible Officer: Associate Dean

Policy Owner: Stuart Ross

Policy Contact: Stuart Ross

POLICY STATEMENT

Valley Forge Christian College strives to provide accurate, honest, and clear information in its print, online, and oral presentations. The college makes every effort to avoid misrepresentation in its communications to students and others. Employees are trained to avoid any form of misrepresentation as they communicate about the college and its activities.

REASON FOR POLICY

The Code of Federal Regulations (CFR) title 34 sections 668.71-74 addresses the issue of misrepresentation on the part of the college. Failure in this area can lead to serious consequences as spelled out in 34 CFR 668.13.

RESPONSIBILITIES

The Associate Dean is responsible to provide accurate and timely information to faculty and staff at key junctures during the academic year. The Dean also conducts training sessions on general school information, which are open to all faculty and staff several times a year. A portion of each training session will include the college's expectations with regard to use of statements that tend to mislead or misrepresent the academic programs or related admissions and financial aid procedures according to U.S. Department of Education statutes.

In addition, departments with proven "high contact" with students and the community like the Financial Aid Office and the Office of Admissions provide training opportunities on more focused subject matters to provide clarity on new policy, procedures and regulations.

This statement as it applies to oral statements shall be provided to the faculty and staff on an annual basis particularly those who represent the college with presentations to prospective students.

HISTORY

Procedures

Records shall be maintained as follows:

The Marketing Department maintains electronic copies of all promotional materials, including quotes and statements made by college personnel.

The Director of Admissions is responsible for the training of departmental personnel regarding misrepresentation of admissions requirements and other college information.

The Director of Financial Aid is responsible for the training of departmental personnel regarding misrepresentation of college financial aid information.

DEFINITIONS

The current regulations define "misleading statement," "misrepresentation" and "substantial misrepresentation."

Misleading statement is defined as including any statement that has the likelihood or tendency to deceive or confuse. A statement is any communication made in writing, visually, orally, or through other means.

Misrepresentation is defined as "any false, erroneous or misleading statement made by an institution or one of its representatives, or to provide marketing, advertising, recruiting, or admissions services directly or indirectly to a student, prospective student, family of either,

accrediting agency, state agency, any member of the public, or US Department of Education.” This includes “dissemination of a student endorsement or testimonial made under duress or because the school required the student to provide the endorsement to participate in a program.”

Substantial Misrepresentation is defined as “any misrepresentation on which the person to whom it was made could reasonably be expected to rely, or has reasonably relied, to that person’s detriment.”

RELATED INFORMATION

Disciplinary Action

Any employee’s conduct resulting in disciplinary actions from misrepresentation activity will be documented in the Human Resources Department and maintained in the employee’s personnel file.
