

Date of Review			
Facility Name		Facility Code	

I. Comprehensive Set of Materials

i These questions are to gain a better understanding of how well facilities are tracking the activities of contractors that they pay to generate the names and contact information of prospective students or “leads.”

(Note: If materials from third parties are not available it should not be regarded as a risk point and instead should be noted for information gathering purposes. If the facility does not use third-party contractors skip or select “N/A” for questions in reference to third-party contractors).

Have copies of each unique advertising/marketing output in each category been received?		
Advertising aired on television	Select	
Advertising aired on radio	Select	
Print advertisements including billboards, bus or other transportation ads, venue ads (e.g., sports stadiums, transit stations) as well as newspaper or equivalent (e.g., local circular, local newsletter, etc.)		
Digital advertisements that appeared on the internet (e.g., Facebook, Google etc.)		
All advertisements placed by a third-party contractor (or subcontractor) that generated leads for prospective students for the facility		
Any website used by a third-party contractor (or subcontractor) to generate contact information (“leads”) for prospective students		
Advertisements (including links) sent by text to prospective leads		
Scripts used by enrollment counselors compensated by the facility in speaking to prospective students		
Scripts used by third party contractors in speaking to prospective students		

Comprehensive Set of Materials Summary:

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II. Review of Advertising, Marketing, and Recruiting Materials

i The following section is to identify any statements in materials that are potentially unfair, deceptive, or misleading, or that constitute abusive acts or practices.

A. Advertising

For each unique advertisement or website please answer the following questions.

For each “Yes” answer, make sure to check the accuracy of the statement. (i.e., Sources course catalog, college scorecard.) Accuracy of each statement and validation of accuracy should be entered into notes.

Do materials reference high demand in the field; job placement rates; job likelihood; or jobs being “virtually” guaranteed? (e.g., Our graduates are in demand at top companies!”)		
Do materials reference likely earnings in the field? (e.g., Earn up to \$50,000 in the first year!”)		
Do materials reference relationships or partnerships with local, regional or national employers? (e.g., We partner with companies like ABC Online Superstore and XYZ Manufacturer!”)		
Do materials reference the type of accreditation it has or suggest its accreditation is good/better? (e.g., College of the Mountains is nationally accredited!” or “College of the Sea is accredited by the same organization as Harvard.”)		
Do materials reference ratings? (e.g., Our school is ranked #2 by best colleges in Virginia)		

Do graduation and placement rates seem high? (e.g., 95% of our graduates placed!)		
Do servicemember completion rates seem high? (e.g., Our veterans land great jobs!)		
The costs and fees are unavailable and/or inaccurate on the website?		
Do materials suggest that GI bill benefits or federal loans and grants will cover the cost of the whole program?		
Do materials suggest that students should take out either federal or private loans to cover the cost of the program?		
Do materials suggest that credits earned are easily transferable?		
Do materials suggest the school or program is endorsed by or affiliated with the military? (e.g., College of the Mountains is VA approved)		
Do materials make representations about the value of the education offered? (e.g., Best priced program; Invest in your future)		
Do materials make representations about speed of completion? (e.g., Earn your degree in less than a year!)		
Do materials state that a school or program has “applied for” accreditation or accreditation “is pending”?		
Do materials advertise programs that require hands-on training online?		

Other issues identified

B. Enrollment Scripts
For each unique advertisement or website please answer the following questions.

Do materials suggest quotas or expectations for contacts and enrollments for employees?		
Do materials make reference to “objections” or “overcoming objections” such as cost, time commitment, reputation, fears or otherwise suggest strategies for creating a sense of urgency or getting prospective students to reflect on shortcomings of their current situation?		
Do materials make representations about classes starting soon or instruct how to use class start dates to encourage a quick decision?		
Does the school require immediate enrollment rather than a waiting period before enrollment?		
Do materials suggest ways to distract from requests to talk to a financial aid advisor?		
Do materials suggest ways to distract from or avoid answering questions about cost? (e.g., Your benefits will pay for virtually all of it; government grants will pay the cost; government loans are practically interest free)		
Do materials make representations about how quickly students can complete programs that are not supported?		
Do materials reference jobs or earnings? (e.g., Virtually guaranteed; we have students working at x and y companies; almost all our students end up making way more than the average)		

Other aggressive tactics or practices identified in the materials?

Advertising and Enrollment Script Summary:

III. Misrepresentation

i For each unique advertisement, script, or website identified above as Yes, ask the following set of questions to determine if the statements meet the threshold of a substantial misrepresentation. If misrepresentation or substantial misrepresentation is determined, take appropriate approval action and refer to VACO Integrity and Protection Team for further review. Note: Referral to VACO is in addition to any appropriate action by the SAA, not in lieu of an appropriate action.

Misleading Statement: Communication, action, omission, or intimation made in writing, visually, orally, or through other means, that has the likelihood or tendency to mislead the intended recipient of the communication under the circumstances in which the communication is made. Such term includes the use of student endorsements or testimonials for an educational institution that a student gives to the institution either under duress or because the institution required the student to make such an endorsement or testimonial to participate in a program of education

Misrepresentation: Any false, erroneous, or misleading statement, action, omission, or intimation made directly or indirectly to a student, a prospective student, the public, an accrediting agency, a State agency, or to the Secretary by an eligible institution, one of its representatives, or any person with whom the institution has an agreement to provide educational programs, marketing, advertising, recruiting or admissions services.

Substantial Misrepresentation: Misrepresentation in which the person to whom it was made could reasonably be expected to rely, or has reasonably relied, to that person's detriment

Lead Generating Activity: Any internal persons or 3rd party entity receiving any compensation directly or indirectly based upon initiating GI Bill® beneficiary interest to secure GI Bill® enrollments, course or program completions by a student, or financial aid in an education and training institution with at least one approved GI Bill® program.

Enter Section II. Statement/item under review

Review the following questions and determine if the statements above in Section II. meet the threshold of a misrepresentation.

**Flag
Content**

Was the misleading/inaccurate statement about any of the following:

- **The nature of the educational program.**
- **Financial charges.**
- **Employability of the graduates.**

Did a misleading statement about the nature of the educational program, the financial charges or the employability of graduates omit information important to an accurate understanding?

If the statement was regarding to the nature of the educational program did it involve any of the following:



- **Source nature and extent of the accreditation.**
- **Transfer of credits to another institution.**
- **Conditions to accept credits from another institution.**
- **Requirements for completion and grounds for termination.**
- **Frequency of availability of needed courses.**
- **Whether completion qualifies a student to take a required exam, obtain a license, become a member of union or otherwise meet reasonably known requirements to be employed in the field of study.**
- **The number, qualifications, and experience of the faculty.**
- **Age and quality of necessary equipment.**
- **Prerequisites.**
- **Available student supports and work-study.**
- **Degree awarded is in the field and authorized by the state.**
- **Unsolicited testimonials or endorsements by counselors, educational organizations, employment agencies, members of a particular industry, students, former students, officials of a local, State or Federal Government or other.**

If the statement was regarding to financial charges of the institution, did it involve any of the following?

- **Offers of scholarships to pay all or part of a course charge.**
- **A particular charge in the customary charge at the institution for a course.**
- **The cost of the program and the refund policy of the institution if the student does not complete the program.**
- **The availability or nature of any financial assistance offered to students, including the obligation to pay loans regardless of completion of employment.**
- **The student's right to reject loans or other financial assistance, including whether the student must apply for a particular type of financial aid, such as financing offered by the institution.**

If the statement was regarding the employability of the graduates did it involve any of the following:

- **Relationships with any organizations leading directly to employment.**
- **Availability and nature of services to assist graduates to obtain employment.**
- **Likely future conditions, compensation, or employment opportunities in the field.**
- **Government job market statistics in relation to the potential placement of its graduates.**
- **Other requirements that are generally needed to be employed in the fields (permits, licenses, credentials disqualifying factors such as criminal convictions).**

Summary of Findings and Level of Concern:

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Overall Advertising and Marketing Review Summary

I. Comprehensive Set of Materials

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II. Review of Advertising, Marketing, and Recruiting Materials

[Empty rectangular box for notes under section II]

III. Misrepresentation

[Empty rectangular box for notes under section III]