

**GUAM COMMUNITY COLLEGE  
Board of Trustees**

**RECRUITMENT POLICY**

**WHEREAS**, Guam Community College (“College”) ensures compliance with Program Integrity Rules consistent with federal regulations (34 C.F.R. 668.71-668.75 and 668.14) and the Department of Defense (DoD) Voluntary Education Partnership Memorandum of Understanding (MOU) regarding restrictions on misrepresentation, recruitment, and payment of incentive compensation. This applies to the educational institution itself and its agents including third parties. As part of efforts to eliminate unfair, deceptive, and abusive marketing aimed at Service members; and

**WHEREAS**, the College and its agents, including third parties, will:

1. Ban inducements, including any gratuity, favor, discount, entertainment, hospitality, loan, transportation, lodging, meals, or other item having a monetary value of more than a de minimis amount, to any individual or entity, or its agents including third party lead generators or marketing firms other than salaries paid to employees or fees paid to contractors in conformity with all applicable laws for the purpose of securing enrollments of Service members or obtaining access to tuition assistance funds. Educational institution sponsored scholarships or grants and tuition reductions available to military students are permissible.
2. Refrain providing any commission, bonus, or other incentive payment based directly or indirectly on securing enrollments or federal financial aid (including tuition assistance funds) to any persons or entities engaged in any student recruiting, admission activities, or making decisions regarding the award of student financial assistance. These restrictions do not apply to the recruitment of foreign students residing in foreign countries who are not eligible to receive Federal student assistance.

As a Title IV institution, the College remains responsible for the actions of any entity that performs functions and tasks on its behalf. These responsibilities include ensuring that employees are not paid for services that would convert these payments into prohibited incentive compensation because of the activity the employees engage in.

3. Refrain from high pressure recruitment tactics such as making multiple unsolicited contacts (3 or more), including contacts by phone, email, or in-person, and engaging in same-day recruitment and registration for the purpose of securing Service member enrollments in non-credit courses or programs.

**NOW, THEREFORE, BE IT RESOLVED**, the Guam Community College and its agents including third parties, shall comply with Program Integrity Rules consistent with federal regulations (34 C.F.R. 668.71-668.75 and 668.14) and the Department of Defense (DoD)

Voluntary Education Partnership Memorandum of Understanding (MOU) regarding restrictions on misrepresentation, recruitment, and payment of incentive compensation; and

**BE IT FURTHER RESOLVED**, that the Guam Community College and its agents including third parties, shall comply with the Recruitment Policy, namely paragraphs 1-3 herein mentioned; and

**BE IT FURTHER RESOLVED**, the Board of Trustees shall adopt, when applicable, a Guam Community College Recruitment Policy Procedure as developed through the College's governance process, and updated as deemed necessary and appropriate.

**Adopted: June 19, 2020**  
**Resolution 2-2020**