

#### 2.1.17 Veterans and Service Members Recruiting and Marketing

Immaculata University does not participate in high pressure recruitment practices and does not market to any specific group for the purposes of admissions and enrollment. Our recruitment efforts are designed to highlight the benefits of the University and the steps taken to advance your educational goals. We are committed to providing an excellent faculty and dedicated student services, such as providing staff to help students file for financial aid using federal, state, and other resources. In addition, financial aid counseling is offered free of charge to the student and is done so without fraudulent compensation, bonus, incentive, or other illegal or unethical activity to any employee.

Immaculata University is committed to guiding each individual from admissions to graduation, and beyond. In order to ensure the avoidance of unfair, deceptive, and abusive marketing aimed at veterans and service members Immaculata University employees, contracted third-party vendors, and marketing firms, Immaculata University prohibits:

Inducements, including any gratuity, favor, discount, entertainment, hospitality, loan, transportation, lodging, meals, or other items 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 TA funds. Educational institution sponsored scholarships or grants and tuition reductions available to military students are permissible.

Providing any commission, bonus, or other incentive payment based directly or indirectly on securing enrollments or federal financial aid (including TA funds) to any persons or entities engaged in any student recruiting, admission activities, or making decisions regarding the award of student financial assistance is not permissible.

Engaging in 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.