

Admissions Coordinator Training

presented by vatterott educational centers. inc



Agenda

Time	Department	Topic	Presenter
2:45pm to 3:15pm	Quality Assurance	The Enrollment Process Student Enrollment Admissions Checklist	IR – Redacted by HELP Committee
3:15pm to 4:30pm	Quality Assurance	Admissions Information Disclosure Transfer Credits Tuition and Fees Program Curriculum Sheets Campus Flip Charts Campus Information Binders	
4:30pm to 5:00pm	Quality Assurance	Providing Optimal Customer Service	
5:00pm to 5:30pm	Quality Assurance	General Discussion – Q&A	



Ethics and Leadership in Admissions

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Overview of Presentation

- Ethical Challenges in For-Profit Education
- Ethical Leadership in Admissions
- Leadership in Ethics
- Ethical Practices in Admissions: The Revised Admissions Coordinator Code of Conduct



Ethical Challenges in our Sector

- Long history of allegations of misconduct, and not all unfounded.
- Misrepresentations relating to program cost, financial aid, term of education, graduation and placement rates, and availability of job opportunities.
- Questionable recruiting, advertising and admissions tactics (recruiting in homeless shelters, offering inducements to enroll or take out loans).
- Outright fraud and deceit (falsifying documents; diploma mills).

Vatterott

- On May 23, 2007, ^{R -- Redacted by HELP} _{, Committee}, one of two admissions representatives involved in the procurement of false GEDs at St. Ann, pled guilty to criminal fraud charges in conjunction with creating fake GEDs for students at Vatterott and other colleges.
- April 2010, ^{R -- Redacted by HELP} _{Committee}, former director of Vatterott College – Kansas City sentenced to a year in federal prison without parole for his role in a conspiracy to fraudulently obtaining federal financial aid by providing fake GEDs and falsifying financial aid forms; also ordered to pay \$361,964 in restitution.
- ^{R -- Redacted by HELP} the last of three defendants to plead guilty in the case. All three worked in admissions and financial aid.

New USDE Regulations

- o Year ago USDE announced sweeping new set of regulations covering 14 different areas, all relating to “program integrity issues.”
- o Proposed regulations out this summer, addressed topics such as misrepresentation, incentive compensation, proof of state authorization, satisfactory academic progress, and verification.
- o These are tough new regulations that have been proposed; they are being debated vigorously and have created a tense atmosphere in Washington.

US Senate Hearings

- Also this summer, Senate HELP Committee initiated hearings to examine for-profit higher education. They have been intense and unfavorable, to say the least.
- At hearing earlier this summer, Senate Democrats made clear they plan to pursue legislation aimed at reining what they see as the sector's dishonest -- if not fraudulent -- practices.
- More hearings are being scheduled, Senate collecting broad sets of information from for-profit colleges, and starting to draft legislation aimed at cleaning up the sector.

The GAO Report

- During most recent hearing, GAO report released. GAO did “secret shopper” investigation of 15 for-profit campuses.
- Discussed report at hearing along with hidden videotape.
- Investigation identified “fraudulent, deceptive or otherwise questionable marketing practices” at all 15 institutions, and outright fraud at four institutions.
- Coupled with a former recruiter’s account of his experience, hearing depicted an industry aggressively and universally going after “leads” and “starts” with the institutional objective of securing federal financial aid dollars.
- “GAO’s findings make it disturbingly clear that abuses in for-profit recruiting are not limited to a few rogue recruiters or even a few schools with lax oversight,” Harkin said.

Increased Oversight by USDE

- Following release of GAO Report, Secretary Arne Duncan sent letter to Chairman Harkin promising to “respond quickly and aggressively” to findings in GAO report.
- The OIG will take appropriate action, including referring for criminal prosecution all individuals who are determined to have been involved in fraudulent or criminal activities. Federal Student Aid (FSA) is also reviewing the GAO findings as a possible basis for investigations of and enforcement actions against schools.
- FSA is also in the process of hiring more than 50 additional staff to strengthen oversight [...]. In the near future, FSA will also hire a new Chief Customer Experience Officer to manage consumer protection activities.
- In addition, we will be reviewing GAO’s undercover project and its methods as well as the similar practices of other Federal agencies. [...] the Department will be developing a program to use these methods to assess institutional compliance with existing statutory and regulatory requirements [...].

Increased Scrutiny in the Press

- Frontline, CNN stories in weeks past.
- ABC News aired a series of programs with content on for-profit schools last week. This material appeared on Good Morning America, the Evening News with Diane Sawyer, and Nightline.
- Segments included undercover videotape elements that painted a negative portrayal of admissions advising, with one reiterating a homeless applicant theme.
- More segments – and secret shoppers – still to come.

Working to Set Ourselves Apart

- Harkin, too, said he believed the encouragement to aggressively and dishonestly pursue students came from higher up. “That doesn’t come from some employee,” he said. “That comes from the top.”
- Making sure everyone knows not at Vatterott. We will provide our educational services with patience, understanding, expertise and integrity.
- At Vatterott, we do things the right way. That is what sets us apart.

Vatterott's Internal Measures

- Revised and Enhanced Policies and Procedures
- Increased Training
 - Divisional Ethics Sessions
 - Company-Wide Admissions and FA Ethics Training Calls
 - Leadership Ethics Training
 - Admissions Coordinator Training
- Internal secret shopping ongoing.
 - There already have been terminations for exaggerations related to job availability and transferability of credits.
 - Also suspensions for exaggerations related to salary potential, exam passage rates, and poor student service.
- QA Audits Ongoing

Ethics & Leadership

- But to be successful, we need leadership, at every level, to consistently communicate the importance of ethical conduct in all aspects of our operations.
- We need this leadership from corporate, campus directors, DOAs, and admissions coordinators.
- In fact, your leadership is most critical.

Ethics

- Standards of conduct that indicate how one should behave based on principles of right and wrong.
- Ethics is not about the way things are...it's about the way things ought to be.
- Ethics is about character and courage and how we meet the challenge when doing the right thing will cost more than we want to pay.

— Michael Josephson

Ethics & Leadership

- Ethical Leadership: Our leaders must be ethical.
- Leadership in Ethics: Our leaders must motivate and inspire others to be ethical.

Ethical Leadership

- Approach action with an ethical perspective:
 - Be sensitive to ethical issues
 - Make reasoned judgments
 - Have the motivation to act ethically
 - Follow through with action
 - Look back and learn from the situation

Ethical Leadership

- Be informed as to applicable rules of conduct:
 - Employee Code of Conduct
 - Principles of Business Ethics
 - Admissions Code of Conduct
 - Accreditor Standards
 - Federal and State statutes, regulations and guidance

Ethical Leadership

- Avoid Common Rationalizations for Unethical Conduct
 - If it's necessary, it's ethical
 - If it's legal and permissible, it's proper
 - I was just doing it for you
 - I'm just fighting fire with fire
 - It doesn't hurt anyone
 - Everyone is doing it
 - It's ok if I don't gain personally
 - I've got it coming
 - I can still be objective

Ethical Leadership

- Ultimately, Practice Ethical Decision-Making
- Bell, Book and Candle
 - Listen for bells warning you
 - Check to see if there are any laws regulations, rules or guidance
 - How will your decision look in the light?

Ethical Leadership

- An ethical person often chooses to do more than the law requires and less than the law allows – there is a difference between what you have a right to do and what is right to do.” – Justice Potter Stewart

Leadership in Ethics

- Practice leadership in ethics
- Leaders:
 - Motivate others to achieve a goal
 - Set Direction
 - Influence and inspire



Leadership in Ethics

- We need leaders in admissions to motivate, influence and inspire others to:
 - Approach action with an ethical perspective
 - Be informed as to applicable rules of conduct
 - Avoid Common Rationalizations for Unethical Conduct
 - Ultimately, Practice Ethical Decision-Making

Leadership in Ethics

- It is not enough for our leaders to merely act ethically themselves, they must set the direction for this entire company, they must motivate and inspire others to do so.



Leadership in Ethics

- When people accept responsibility for their own conduct and for the well-being of others, ethics serves to stabilize society. Ethical leadership is the antidote to despair and cynicism that is crushing our spirit and clouding our future. Ethics is our hope.

— Gary Edwards, Ethics Resource Center

Ethical Practices in Admissions: The Revised Admissions Coordinator Code of Conduct

- o Admissions Personnel are charged with (1) recruiting quality prospective students to attend Vatterott schools, (2) communicating to such students pertinent information relating to the schools' educational programs and services, and (3) assisting such students with completion of the enrollment process, should they choose to attend. It is the Company's policy that at all times these duties will be carried out with exceptional professionalism, honesty, and integrity. The purpose of this Admissions Personnel Code of Conduct is to ensure compliance with this policy by establishing standards of conduct for employees with responsibility for admissions. Violations of this Code of Conduct may result in disciplinary action, up to and including dismissal.

Ethical Practices in Admissions: The Revised Admissions Coordinator Code of Conduct

- The following guidelines shall be adhered to by all Admissions Personnel through all phases of the admissions process:
- Admissions Personnel shall maintain an exemplary level of professionalism, both in conduct and appearance, and provide prospective students with superior consideration and service.
- All information provided by Admissions Personnel to a prospective student shall be complete, current and accurate.
- No Admissions Personnel shall have a conflict of interest with respect to any prospective student. Interactions between Admissions Personnel and prospective students shall be for professional purposes only.

Ethical Practices in Admissions: The Revised Admissions Coordinator Code of Conduct

- Admissions Personnel shall not question any prospective student regarding his or her intimate personal life, race, religion, sexual orientation, age, marital or family status, or financial status.
- Admissions Personnel shall not permit a prospective student to sign an enrollment agreement unless and until such Personnel has (a) verified that the prospective student satisfies all criteria for admission, and (b) verified that the prospective student has received all information and services specified in, and signed, the *Vatterott Educational Centers, Inc. Admissions Checklist*.

Ethical Practices in Admissions: The Revised Admissions Coordinator Code of Conduct

- Admissions Personnel shall not discuss the Federal Student Financial Aid Programs beyond reciting the *Vatterott Educational Centers, Inc. Approved Statement*, located in the *Admissions Coordinator Training Manual*. Admissions Personnel shall not (a) counsel or comment on the amount of federal financial aid available to a prospective student, (b) encourage a prospective student to obtain federal financial aid funds in any amount, or (c) delay or deny any prospective student access to the Financial Aid Department.
- Admissions Personnel shall not discuss whether and to what extent other institutions will accept credits earned at a Vatterott school other than (a) to explain that the acceptance of credits is entirely the decision of the receiving institution, (b) to encourage a prospective student to inquire directly with the receiving institution, or (c) to review the parameters of an articulation arrangement between a Vatterott school and another postsecondary institution.

Ethical Practices in Admissions: The Revised Admissions Coordinator Code of Conduct

- Admissions Personnel shall not discuss or otherwise make any comment, general or specific, regarding the availability of employment subsequent to a prospective student's graduation. Admissions Personnel may (a) discuss the assistance provided to students and graduates by the Career Services Department, (b) review the school's most recent employment/placement rates (as reported to the school's accreditor), or (c) encourage a prospective student to research independently the availability of jobs in his or her field interest.
- Admissions Personnel shall not discuss or otherwise make any comment, general or specific, regarding earnings potential for graduates. Admissions Personnel may (a) provide a prospective with the website address for the Bureau of Labor Statistics or (b) encourage a prospective student to research independently the salaries of practitioners in his or her field interest.

Parting Thoughts

- Admissions Personnel and the current environment.
- Today's training.