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**OFFICE OF INSTITUTIONAL COMPLIANCE AND RISK MANAGEMENT**

**Title: Prohibited Incentive Payments Policy**

**Policy Statement:**

Benedictine University does not pay employees within student recruiting, admission activities or who make decisions regarding the award to students who use financial aid, any bonus or commission. Employees are paid their annual rate of pay, and those who are hourly are subject to overtime according to FLSA laws. They are not eligible for any incentive programs.

**Benedictine University refrains from providing commission, bonus, or other incentive payment based directly or indirectly on enrollments or federal financial aid to any persons or entities engaged in any student recruiting, admission activities, or making decisions regarding the award of student financial assistance.**

**Procedures:**

In accordance with the Department of Defense (DoD) MOU agreement, Benedictine University -Admission Office shall not engage in unscrupulous student recruitment, admission activities or making decision regarding the awards of student financial assistance for the purpose of securing service member enrollments.

* Department of Defense, MOU, paragraph 3.j.(2), institutions are required to “Refrain from 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.”
* Department of Defense, MOU, paragraph 3.j.(3), institutions are required to "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.”
* Department of Defense, MOU, Paragraph X.x.(x), institutions are required to “Provide evidence that the institution directs Service members to speak with their Educational Services Officer (ESO) or counselor within their Military Service prior to enrolling the student in the institution.”

Benedictine University abides by the National Association for College Admission Counseling’s (NACAC) Guide to Ethical Practice in College Admission. The guide is located in the link at:

<https://www.nacacnet.org/who-we-are/what-we-do/guiding-ethics/nacacs-guide-to-ethical-practice-in-college-admission/?_ga=2.97807703.978760663.1711640338-465202861.1711640338>

**Department Responsible:** Office of Institutional Compliance and Risk Management