

## MISREPRESENTATION POLICY

Ohio Business College strives to uphold the highest standards of integrity in providing accurate, honest, and clear information in print, online, media, and oral presentations. OBC will make every effort to avoid misrepresentation to students and others in communication in writing, visually, orally, or through other means. OBC is committed to ensuring that the actions and activities conducted at the college promote such an environment.

Ohio Business College is prohibited under federal regulations (34 CFR 668.71-74) from making any false, erroneous, or misleading statement directly or indirectly to a student, prospective student, member of the public, accrediting agency, state agency, or to the Department of Education. A misleading statement includes any statement that has the likelihood or tendency to mislead under the circumstances. A misleading statement may be included in the institution's marketing materials, website, or any other communication to students or prospective students. A statement is any communication made in writing, visually, orally, or through other means. Misrepresentation includes any statement that omits information in such a way as to make the statement false, erroneous, or misleading. Misrepresentation includes the dissemination of a student endorsement or testimonial that a student gives either under duress or because the institution required such an endorsement or testimonial to participate in a program.

The current regulations provide numerous examples of topics that cannot be misrepresented within each of the four areas covered by statute 20 USC 1094(c)(3). The four areas are:

- The nature of the institution's educational program.
- The institution's financial charges.
- The employability of the institution's graduates.
- Relationship with the Department of Education. A Title IV eligible school may not
  describe its participation in a way that suggests approval or endorsement by the
  Department of Education of quality of its educational programs.

Procedure. Ohio Business College strives to provide accurate, honest and clear information in print, online, broadcast media, or oral presentations. OBC will make every effort to avoid misrepresentation to students and others in communications made in writing, visually, orally, or through other means. Training of employees to avoid any form of misrepresentation as they disseminate communications is a key component of this procedure.

- The Campus Directors are responsible for general training of all faculty and staff at their campus regarding misrepresentation of general information pertaining to the college and more specifically admissions, career services, and academic information.
- The Director of Financial Aid is responsible for training of personnel under his/her supervision regarding misrepresentation of college financial aid information.

• The Human Resources is responsible for training corporate staff regarding misrepresentation of the college information.

Disciplinary Action. Any violation of this directive will be taken seriously and Ohio Business College will ensure that it is not repeated. Any employee's conduct resulting in disciplinary actions from misrepresentation activity will be documented in the Human Resources Department and maintained in the employee's personnel file.