

Misrepresentation Management Policy and Guidelines

The GTU is prohibited under federal regulations 34 CFR§sections 668.71 through 668.75 from making any false, erroneous or misleading statements directly or indirectly to a student, prospective student, member of the public, accrediting agency, federal or state agency, or the U.S. Department of Education.

In an effort to clarify the Graduate Theological Union's (GTU) commitment to practicing personal and academic integrity and ethical behavior, the institution takes appropriate steps to provide accurate, honest and clear information about the institutions and its programs across all outreach channels, including but not limited to: print, online, broadcast media or oral presentations to all audiences (and to avoid misrepresentations in its communications to students and others). Employees are informed of these policies and resources are made available to help avoid any form of misrepresentation as they communicate the GTU's functions, programs and activities, inclusive of this Guide.

Definitions

A misleading statement is defined as a statement that has the likelihood or tendency to deceive or confuse. A statement is any communication made in writing, visually, orally or through other means.

Misrepresentation is defined as any false, erroneous or misleading content made by an institution or one of its representatives or servicers directly or indirectly to a student, prospective student, family of the former, accrediting agency, federal or state agency, any members of the public, or the U.S. Department of Education. This includes the dissemination of a student endorsement or testimonial made under duress or because the school required the student to provide the endorsement to participate in a program.

The definition of misrepresentation applies to statements made by:

- The Graduate Theological Union
- A representative of the Graduate Theological Union, or
- Any other institution, organization or person with whom the Graduate Theological Union has an arrangement to provide educational programs or to provide marketing, advertising, recruiting, or admissions service.

Substantial misrepresentation is defined as “any misrepresentation on which the person to whom it was made could reasonably be expected to rely, or has reasonably relied, to that person's detriment.”

Substantial misrepresentations are prohibited in all forms, including but not limited to: those made in any advertising or promotional materials or in the marketing or sale of courses or programs of instruction offered by the Graduate Theological Union.

The current regulatory provisions provide numerous examples of topics that cannot be misrepresented within each to the four areas covered by statute 20 USC§1094(c)(3) by the school itself, one of its representatives, or other related parties, with respect to:



- Nature of the institution's educational programs (34 CFR 668.72)
- Nature of financial charges, tuition, fees and other educational costs (34 CFR 668.73)
- The employability of the GTU's graduates (34 CFR 668.74)
- The relationship of the institution with the U.S. Department of Education. (34 CFR 668.75)
A Title IV eligible institution, its representatives, or any organization or person with whom the eligible institution has an agreement may not describe the eligible institution's participation in the Title IV, Higher Education Act programs in a manner that suggests approval or endorsement by the U.S. Department of Education of the quality of its educational programs.

Procedures

The Graduate Theological Union prohibits the use of statements that tend to misrepresent the academic programs or related admissions and financial aid procedures.

To enable GTU-wide compliance with this policy, each department is encouraged to work with the marketing and communication office in the creation of all materials. Each department must maintain archival copies, preferably in electronic form, of all promotional materials, including official quotes and statements made by the GTU's personnel. Directors of operational units are responsible for training of personnel under their supervision regarding misrepresentation of information about the institution, admissions requirements or its programs or services.

Disciplinary Action

The GTU considers violations of this policy as serious offenses and will take disciplinary action appropriate to the nature and extent of the violation to ensure that violations are 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.

Reporting Concerns

Any persons with concerns regarding institutional misrepresentation should bring those concerns to the attention of the Chief Strategy Officer, as well as the Chief Operating Officer.