



MARKETING COMMUNICATIONS & REGULATORY COMPLIANCE POLICY

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Contents

INTRODUCTION	5
GENERAL PURPOSE	5
MARKETING AND COMMUNICATION REGULATIONS	5
A. Advertising and Communications	5
B. General Requirements	6
C. Prohibited Activities	6
D. PROGRAM NAMES	7
E. GOVERNMENT/INDEPENDENT THIRD-PARTY JOB GROWTH AND SALARY DATA	7
CONSUMER DISCLOSURES	8
A. School Performance Fact Sheet	8
B. School Brochures	8
ACCREDITATION	8
A. Institutional	8
B. Programmatic	9
TRADITIONAL ADVERTISING	9
A. Television and Radio	9
B. Billboard, Signs and Banners	9
C. Print	10
1. Magazine/Newspaper	10
2. Phone Books/Directories	10
PROGRAM BROCHURES	10
INTERACTIVE ADVERTISING	11
A. Affiliate	11
1. Compliance Requirements	11
2. New Inquiry Providers	11
3. Inquiry Provider Onboarding	11
B. Email Marketing	11
C. Text Message	13
D. Paid Search/Display	13
E. Social Media	14
F. Website	15
ADVERTISING IN LANGUAGES OTHER THAN ENGLISH	16

USE OF LOGOS, COPYRIGHTED MATERIALS AND TRADEMARKS	17
STATE SPECIFIC REQUIREMENTS.....	17
ADMISSIONS STAFF / RECRUITER TITLES	17
ENROLLMENT PROMOTIONS	18
SCHOLARSHIPS	19
USING REFERENCES TO FINANCIAL AID, SCHOLARSHIPS, AND GRANTS IN ADVERTISEMENTS	19
USING MILITARY, VETERANS' AFFAIRS OR GI BILL® REFERENCES, IN ADVERTISEMENTS OR STUDENT-FACING MATERIALS.....	20
SURVEYS	21
TESTIMONIALS/ENDORSEMENTS.....	21
SWEEPSTAKES AND CONTESTS	23
A. Sweepstakes.....	23
B. Contests	24
C. Raffles.....	24
D. Trademarks	24
E. Official Rules	24
F. Contacting Sweepstakes and Contest Entrants	24
COMPLIANCE MONITORING TOOLS.....	25
A. Inquiry Management	25
B. Lead Quality	25
APPENDIX	27
A. San Joaquin Valley College State Approvals	27
CALIFORNIA.....	27
Other states:	27
FLORIDA	27
GEORGIA	27
MARYLAND.....	27
TEXAS	28
WASHINGTON	28
B. San Joaquin Valley College Programmatic Accreditation and Approvals	29
Aviation Maintenance Technology	29
Criminal Justice: Corrections.....	29
Dental Assisting.....	29

Dental Hygiene.....	29
Registered Nursing.....	29
Respiratory Therapy.....	30
Surgical Technology	30
Vocational Nursing.....	30
C. Carrington College State Agency Approvals	30
ARIZONA.....	30
IDAHO.....	31
NEVADA.....	31
NEW MEXICO	31
OREGON	31
TEXAS	31
WASHINGTON.....	31
OTHER STATES.....	32
Georgia.....	32
Minnesota	32
Nebraska	32
D. Carrington College Programmatic Accreditation and Approvals.....	32
DENTAL.....	32
MASSAGE THERAPY.....	33
MEDICAL ASSISTING	33
MEDICAL RADIOGRAPHY.....	34
NURSING	34
PHARMACY TECHNOLOGY	35
PHYSICAL THERAPIST ASSISTANT	35
RESPIRATORY THERAPY.....	35
SURGICAL TECHNOLOGY	35
VETERINARY TECHNOLOGY	35
E. Vendors	36
F. Facebook Terms of Use.....	36

INTRODUCTION

Ember Education sets high standards of ethical marketing communication and recruiting practices that meet or exceed all regulatory requirements of the San Joaquin Valley College (SJVC) and Carrington College's institutional and programmatic accrediting bodies, the United States Department of Education, Department of Defense, Department of Veterans Affairs, Federal Trade Commission and State Licensing Agencies.

GENERAL PURPOSE

The purpose of this policy is to ensure that colleagues and third parties are aware of their responsibilities regarding the development, approval and publishing of public-facing promotional materials and communications, regardless of media, programs or campus.

MARKETING AND COMMUNICATION REGULATIONS

The following is a synopsis of advertising and marketing regulations published in federal and state education agency statutes and rules that are the basis of the Ember Education marketing and Communication Policy Manual.

A. Advertising and Communications

Advertising and communications include any print, published, recorded, broadcast, electronically transmitted, or publically presented information that markets or describes the institution for any purpose. It includes any form of public notice however disseminated or utilized by an institution.

Included is virtually every publication and promotional item that could be encountered by prospective students from recruitment and promotional activities. Examples include, but are not limited to:

- Billboards
- Blogs on institutional webpages
- Brochures
- Call center scripts
- Catalogs
- Direct Mail
- Disclosures
- Digital advertising including billboards, transportation center signs, and bulletin boards
- Emails
- Flyers posted on bulletin boards
- Internet/online advertising (including digital display, landing pages)
- Newsletters and other school publications
- Magazine and newspaper ads
- Posters
- PowerPoint presentation and training desks, including talking points
- Press releases and announcements
- Radio, video and television advertisement scripts prior to recording
- Recruitment and Student Finance presentation and scripts
- Signage

- Student communications and newsletters sent via direct mail, the student portal, or text message (SMS)
- Surveys
- Sweepstakes
- Telephone directories
- Telephone “on hold” messages
- Web pages

B. General Requirements

- Colleges must hold the appropriate internal and external approvals before announcing, advertising, or otherwise conveying the beginning of classes, a date of opening, announcing new programs, or soliciting students for enrollment.
- The correct name of the institution, as it appears in the institution’s approval to operate, must appear in all advertising.
- The full legal name, address and phone number of the institution is included in advertising and other promotional materials.
- The full name of a program as approved, including the credential level(s) should be listed at least once in each marketing piece, and preferably as the first mention of the program name.
- The Colleges clearly indicate that education is offered, not employment
- Only testimonials reflecting current practices, conditions or employment opportunities are used in promotional materials.
- Television and radio advertisements shall disclose if a person portraying a student is an actor by indicating “actor portrayal.”
- References to financial assistance availability shall include the phrase, “Student loans, grants, and scholarships are available to those who qualify.”
- The level of educational programs provided shall be clearly indicated.
- For courses offered by distance education, the method of delivery must be described.
- When describing a program’s length, promotional materials will not promise that a consumer can graduate in the minimum time it takes to complete the program (weeks, months, years). Instead, promotional materials will state that consumers can graduate “in as few as” or “approximately” the minimum time it takes to complete the program for a student taking a full course load, without course failure or withdrawal.
- Additionally, The Colleges shall refrain from using minimum time to complete when fewer than 20% of students complete within the standard program length (as outlined in the Academic Catalog). New Programs may promote minimum time to complete within the policy if the college average on-time completion rate is 20% or greater. (Please refer to the current Program Marketing Outcomes Document, prepared each year for the list of underperforming programs.)

C. Prohibited Activities

The Colleges’ promotional materials:

- Will not use placement rates in any promotional materials.
- Will not promise a specific salary to graduates of a program.

- Will not promise financial aid to consumers.
- Will not guarantee or promise, even by implication that students will get a job after graduation.
- Will not use hyperbole or “puffery” statements that cannot be proved, such as “the best,” “top notch,” “state of the art,” or “free.”
- Will not attempt to increase the perceived reputation of the Colleges’ brand by denigrating other higher education institutions.
- Will not solicit for students for enrollment by publishing advertisements in “help wanted” columns in print ads, websites or other media.
- Will not advertise in any promotional material that programs of students are offered without including the location where instruction is given.

D. PROGRAM NAMES

When referencing the name of a program, the official program name, including the credential level, as listed in the catalog should be used at least once in each marketing piece, and preferably as the first mention of the program name.

Generally understood abbreviations may be used in the first mention of longer program titles, such as HVAC-R, DH and VN, so long as the full program name appears later in the ad copy.

When discussing the broader field of study, or specific career outcomes related to a program, variations are acceptable, regardless of where it appears in the advertisement.

Examples:

- “Pursue a career as a veterinary assistant. Get your Certificate in Veterinary Assisting in as few as 10 months” is acceptable, because while it mentions a job outcome as veterinary assistant, the actual name of the program is listed as approved.
- “Vet Assistant Certificates can be earned in as few as 10 months”, would not be acceptable because it conflates the job outcome with the actual name of the program.

E. GOVERNMENT/INDEPENDENT THIRD-PARTY SOURCES

Colleges may promote published third-party career information for job types related to their programs under the following conditions.

- DO NOT USE SALARY OR CAREER GROWTH DATA.
- The information used must be from a reputable source, such as the U.S. Bureau of Labor Statistics, state workforce development agencies, or independent job tracking sites such as O*Net or My Next Move.
- The information cited must be the most current release of information.
- The promotion of the information must include a link to where the information is published.
- When using information from another College created piece please cite the original source and not the other College piece.

CONSUMER DISCLOSURES

A. School Performance Fact Sheet

The Colleges with campuses in states that require School Performance Fact Sheets (California and Oregon) and Receipt of Enrollment Policies (Texas) will use the state-specific template to provide disclosures to consumers. The Colleges shall follow the state agency guidelines to create and publish school performance data, and make the data available to the public.

B. School Brochures

The Colleges must post all campus and program brochures to the Colleges' websites to comply with California Standards. The posting of brochures for non-California campuses or programs not offered in California is at the discretion of the college.

ACCREDITATION

A. Institutional

Institutional accreditation statements are provided to the Marketing Department by the SJVC Director of Institutional Relations and the Carrington College VP of Accreditation and Academic Regulation. Once the marketing department has received an updated statement, the staff re-publishes the information provided on its website and landing pages within three days of notification.

For any mention of or reference to institutional accreditation in any public facing material (catalog, website, landing pages, brochures, etc.) The Colleges must publish the full approved accreditation statement as outlined below.

San Joaquin Valley College is accredited by the WASC Senior College and University Commission (WSCUC), 985 Atlantic Avenue, Suite 100, Alameda, CA 94501, (510)748-9001 and also the Accrediting Commission for Community and Junior Colleges, Western Association of Schools and Colleges, 10 Commercial Blvd., Suite 204, Novato, CA 94949, (415) 506-0234, an institutional accrediting body recognized by the Council for Higher Education Accreditation and the U.S. Department of Education. Additional information about accreditation, including the filing of complaints against member institutions, can be found at www.accjc.org.

Carrington College is accredited by the Accrediting Commission for Community and Junior Colleges, Western Association of Schools and Colleges, 331 J Street, Suite 200, Sacramento, CA 95814, (415) 506-0234, an institutional accrediting body recognized by the Council for Higher Education Accreditation and the U.S. Department of Education. Additional information about accreditation, including the filing of complaints against member institutions, can be found at www.accjc.org.

Updates to the College Catalogs are noted in the College Catalog Supplement, which is re-published on the College's website within three days of the Marketing Department being notified of College Catalog Supplement Revisions. All low priority updates (not related to compliance) are made to print materials prior to shipping the next Admissions supply reorder. Supply orders are generally filled every (X) weeks. If an update is urgent (related to a compliance issue), print material updates are made within 24 hours

and then shipped to the appropriate campuses with the directive to immediately purge all existing inventory and replace with updated documents.

Prohibited Accreditation Statements:
Accredited Degrees
Degrees or programs are accredited by ACCJC/WASC
“Fully Accredited” or “full accreditation” – these statements must not be used since partial accreditation is not possible.

B. Programmatic

Several programs at The Colleges are accredited and/or approved by outside recognized organizations. As required by our institutional accreditor and state approver(s), programmatic accreditation and approval information is available to consumers on that College’s website, on appropriate program landing page, and in the Colleges’ Catalog and College brochures.

Programmatic accreditation and/or approval updates are provided to the Marketing Department by the Compliance Department. Once the marketing department has received new accreditation and/or approval information, the staff updates the information provided on its websites and landing pages within three days of notification.

TRADITIONAL ADVERTISING

All traditional advertisements must include a prominent mention of Consumer Disclosures web link.

All traditional advertisements, whether created by the Ember Ed Marketing Department or a contractor, are reviewed and approved by the Compliance Department. If any published advertisement is found to be incorrect, (i.e. typo, wrong address, etc.) the Marketing Staff will work to replace the artwork with a corrected version at the next possible publication date, and reference the discovered error on the consumer information page of its institutional website.

A. Television and Radio

Radio and Television (TV) advertising spots are created by outside agencies and sent to the Ember Ed Marketing Department for review and the Compliance Department for approval.

All TV advertising for The Colleges will include the College’s website or landing page address, or phone number. The consumer information disclosure landing page for the college also is to be featured prominently on the screen.

Radio spots will reference the College website as a contact method and include a telephone number to contact the College. Radio scripts are written and read to end with “Visit (consumer info url) for important information on program outcomes.”

B. Billboard, Signs and Banners

All outdoor advertising for the Colleges will include the College website address, any icons to the College social media sites, and/or phone number (if applicable). The Ember Ed Marketing Department creates these ads and banners, and they are to be reviewed by the Compliance Department prior to production.

If any published outdoor promotion is found to be out-of-compliance, the Ember Ed Marketing staff will take it down immediately and replace with a compliant version as soon as possible.

C. Print

1. Magazine/Newspaper

All print advertising for the Colleges in magazine publications will include the campus phone number, website address, and mention of the social media sites (if applicable). The Ember Ed Marketing Department creates these ads and they are reviewed and approved by the Compliance Department prior to production. If any print advertisement is found to be incorrect, (i.e. typo, wrong address, etc.) the Ember Ed Marketing Staff will replace the artwork with a corrected version at the next possible publication date. If compliance errors are found, then an acknowledgment statement and corrective language would be posted to the consumer disclosures page of the college website. When specific College programs are mentioned in print advertising, the following statement is also included “Visit (consumer information url) for important information on program outcomes.” If space is prohibitive, the statements “Visit (consumer info url) for more information” or “Program info at (consumer info url)” are to be used alternately.

2. Phone Books/Directories

All print advertising for The Colleges in phone directories includes the campus phone number and address. If specific programs are mentioned, the following statement is also included: “Visit (consumer disclosure url) for important information on program outcomes.” If space is prohibitive, the statements “Visit (consumer disclosure url) for more information” or “Program info at (consumer disclosure url)” are used alternatively.

D. Social Media/Ad Copy

Paid social, paid search, and organic social have limited space and link capability. Since there are limitations within this platform, in lieu of including the student consumer information statement please ensure that the link within the ad links to a landing page that includes the student consumer information statement.

PROGRAM BROCHURES

Program-specific brochures include the following content: What students will learn, the program certifications available, career information, admissions requirements, and if applicable, the standard course listing.

These brochures are updated as program and campus details change over time. All brochure content and revisions are reviewed by at least two Ember Ed Marketing staff for accuracy prior to submitting to Compliance for review. Final proofs are submitted to Compliance for review once content has been reviewed and approved for distribution by the Director of Admissions. Specific data is included for each program, by credential level, and at each campus location. All low-priority updates (not related to compliance) are made to print materials prior to shipping the next Admissions supply order. Supply orders are generally filled every five weeks. If an update is urgent (related to a compliance issue), print material updates are made within 24 hours, and then shipped to the appropriate campuses with the directive to immediately purge all-existing inventory and replace with updated documents.

These brochures also list the College's institutional accreditation statement, state approval, and programmatic accreditation or approvals where applicable.

INTERACTIVE ADVERTISING

Ember Education contracts several Vendors to assist in the Interactive Advertising efforts. Vendors are identified by name in Appendix C; Vendors actions on behalf of the Colleges are explained below

A. Affiliate

Ember Education works directly with agencies, third-party inquiry providers and advertisers (aka third-party vendor or "vendor") to promote its programs to prospective students. A third-party inquiry provider can source inquiries using several different marketing channels including organic and paid search, display, and social media advertising.

1. Compliance Requirements

Compliance with Ember Ed Standards and best practices for marketing is especially sensitive with third-party inquiry providers. The Colleges provide each vendors with Form Posting Instructions (FPI), which outlines the Ember Ed requirements including campus and program availability, rejection criteria, and required language (accreditation, financial aid, consumer information, and TCPA).

Ember Ed utilizes a technical platform, described in detail under **Compliance Monitoring Tools**, to monitor affiliate compliance with the Ember Ed Standards. Any exception is identified daily and result in direct corrective actions within 24 hours.

2. New Inquiry Providers

Prior to bringing on a new third-party inquiry provider, Ember Ed conducts a thorough evaluation on the third-party's business practices, first checking its website(s) for compliance.

3. Inquiry Provider Onboarding

Once a potential third-party provider has been evaluated and selected to bring on as a test, Ember Ed requests a preview link to review the landing page where the College is being advertised. The Compliance Department reviews the content in the preview link to ensure it corresponds with the content from the FPI, and includes a TCPA disclosure with privacy link to (college privacy policy url) and a consumer disclosure link to the (consumer disclosure url).

B. Email Marketing

Ember Ed utilizes email marketing to send nurturing, remarketing, and reactivation content to opted-in prospective students. Ember Ed uses external email Vendor tools to send mass email campaigns.

Ember Ed only sends email messages to prospects who clearly opt in on a web form. Prospects can opt in to email messages from the college on the College's website, landing pages or on an affiliate vendors' forms. Before submitting an inquiry form, consumers are shown disclaimer text that clearly notifies them of the College's use of automated technology used to send email messages. Form disclaimer text as shown below:

Disclaimer Text

By clicking "the button" button, I expressly authorize (the College), its subsidiaries, affiliates,

agents and contractors to contact me regarding educational services via email, telephone (including cellular) or text message – using automated technology– at the email address and phone numbers provided. I understand this consent is not required to attend (the College). I understand message and data rates may apply, and that my consent may be revoked at any time by notifying (the College). View our [privacy policy](#) (hyperlinked to the privacy policy page)

“The button” refers to the link that transmit the prospective student information to the school. The button may include specialized language to the marketing form in which it is embedded, such as “get started” or “request information”, so long it is clear that the use of the link will result in the submission of personal information. The use of ambiguous or deceptive terms for the button, such as “next”, “terms and conditions”, or “about us” is prohibited.

Ember Ed’s external email Vendor tools are used to send automated email campaigns. Emails are sent to prospects starting on the day that they submit an inquiry to the College.

Ember Ed’s external email Vendor tools are also used to send unique one-off campaigns to prospective students. These campaigns promote upcoming workshops, new program or campus launches, etc. The Marketing Department pulls relevant lists from student relationship management Vendors. The Marketing Department will select the campus, program, inquiry status and date range of the target audience(s).

The Marketing Department will verify that email addresses receiving one-off campaigns (remarketing, for example), are valid using an email verifying tool Vendor. This ensures that email blasts are not delivered to a high percentage of invalid email addresses, which can cause the College to be flagged as a spam sender by Internet Service Providers.

The Marketing Department will design and review, and submit to Compliance to approve the email creative (subject line and content). Once approved, the Marketing Department will schedule the email delivery to prospective students.

Every email campaign The Colleges send must include the following, as required by the CAN-SPAM Act.

- An opt-out (or unsubscribe) link
- The College’s physical address and contact information
- Accurate header information
- Relevant subject line
- Relevant content

If a subscriber opts out or unsubscribes from email contact, the request is granted immediately and the subscriber will no longer receive email communications from the college.

If a subscriber replies to an email sent from The College, the reply is delivered to a college admissions email address. The Admissions Department will review the reply. If the consumer has a question, complaint or concern, the Admissions Department will direct the consumer to the appropriate College contact to resolve.

C. Text Message

The Ember Ed Marketing Department utilizes SMS (also known as text messaging) to send remarketing and re-activation content to opted-in prospective students. Ember Ed uses an external texting tool Vendor to send SMS messages.

Text message language should be submitted to the Compliance Department for review prior to initial distribution, and are subject to review on a monthly basis.

Colleges may only send SMS messages to prospects who clearly opt in on a web form. Prospects can opt in to SMS messages from a College on the College's website, landing pages or an affiliate vendors' forms. Prospective students have to check a box to opt in to receiving text messages while they are filling out an inquiry form, the box may not be defaulted to checked. Before submitting an inquiry form, consumers are shown disclaimer text that clearly notifies them of the College's use of automated technology to send SMS messages. Form disclaimer text is as shown below:

Disclaimer Text

By clicking "the button", I expressly authorize (the College), its subsidiaries, affiliates, agents and contractors to contact me regarding educational services via email, telephone (including cellular) or text message – using automated technology– at the email address and phone numbers provided. I understand this consent is not required to attend (the College). I understand message and data rates may apply, and that my consent may be revoked at any time by notifying (the College). View our [privacy policy](#) (hyperlinked to the privacy policy page)

If a prospective student replies to any text message with any of the following opt-out words, the student is to be unsubscribed from receiving further text messages from the College:

- Stop
- Cancel
- Wrong Number
- Erase
- Do Not Contact
- Do Not Text
- Remove
- End
- Quit
- Take me off

D. Paid Search/Display

Ember Ed uses paid search and display advertising to purchase student inquiries from multiple advertising platform Vendors. An enterprise-level advertising tool Vendor is used to help manage advertising campaigns between these platforms. Ember Ed bids on words tied directly to web searches from prospective students interested in programs offered by the College(s).

The advertising campaigns for Ember Education are primarily structured by program. Only keywords relevant to the programs offered are targeted. For broad match keywords, search engines have the ability to match keywords their algorithm considers relevant. This matching allows Ember Ed to discover more relevant search terms. Occasionally, the search engine's algorithm will match the College's ad

words to irrelevant keywords. For example, the broad match keyword “San Joaquin Valley College” was matched to a college in Texas called “San Jacinto College.” Every month, the search engines’ keyword matching is reviewed. When irrelevant keywords are discovered, negative keywords are added to prevent the Colleges’ ads from showing for these keywords.

Ember Ed maintains a list of negative keywords. This list includes deceptive words such as “jobs,” “employers,” “free,” and also words related to programs the College does not offer (“MBA,” “crime scene investigator,” “Communications major”...)

When creating ads and landing pages, clarity is the highest imperative. Any deceptive words, misleading tactics, even if not expressly prohibited, do not generate qualified inquiries intended in the Ember Ed marketing communications plan. Every ad and landing page is reviewed for clarity and accuracy by the Compliance Department.

Ember Ed takes extra precaution when describing program lengths to avoid promising students a graduation time. Typically, the Colleges use phrases like “Earn your degree in {PROGRAM} in as few as 14 months” or “Graduate in as little as 7-12 months.” Once the ad is clicked, the landing page provides more specific language.

Program lengths are approved by weeks. When converting weeks to months, please use the ratio of 4.33 weeks per month. Additionally, please refrain from using program length in marketing for programs at locations where the official on time completion rate on the school performance fact sheet/receipt of enrollment policies is below 20%. Programs new to a campus may include program length in advertisements as it is meant as an estimate.

All of The Colleges’ landing pages contain links to accreditation and approval information and Consumer Information and privacy policies. On forms where a phone number is requested, text in compliance with TCPA regulations is visible.

If a problem with an ad or landing page is discovered, all landing pages or ads are reviewed for the problem and are resolved within 24 hours. Non-compliant or inaccurate ads are paused as soon as they are discovered and replaced by corrected ads.

E. Social Media

Both San Joaquin Valley College and Carrington College have established and maintain a brand presence on Facebook, Twitter, Instagram, YouTube, Pinterest, Google +, Wikipedia, and local search sites such as Yelp. The Ember Ed Marketing Department members are administrators of the social media pages. The Colleges regularly post brand-related content to social media to engage with prospective, current and former students. The Marketing and Compliance Departments proactively monitor, review and respond to consumer questions and complaints.

The Marketing Department reposts (Facebook, Instagram, LinkedIn, Pinterest, etc.) and re-tweets (Twitter) any relevant content that highlights the accomplishments of College students and graduates that is informative and motivational. The Marketing Department posts compliance approved television commercials and other student and College program related videos to YouTube.

The Marketing Department reviews and responds to all social media messages and comments within 48 hours of notification of their receipt.

If a consumer leaves a comment stating a grievance or expresses that he or she is dissatisfied or displeased with the College, the Marketing Department will follow up directly with the consumer, or direct the matter to the campus contact with a copy to the Compliance Department to resolve.

Ember Ed makes every effort to respond to consumer criticism and resolve problems the consumer is experiencing. Ember Ed will only delete comments or posts from its social media pages and/or profiles if the content contains viruses, corrupted files or any other similar damaging properties; is defamatory, abusive, threatening or otherwise or infringing on the legal rights of others; is inappropriate, obscene, indecent, misleading or unlawful; is not original and appropriate rights are not clearly posted (infringes upon intellectual property laws). Ember Ed identifies these reasons for deletion in the Social Media Platform's Terms & Conditions.

Ember Education's Marketing Department creates ads that are displayed as social media posts. These ads, and the click-through landing pages, are reviewed for compliance and accuracy by the Ember Ed Compliance Department. Once approved the Marketing Department manages and circulates the ads to prospective students based on the criteria set forth by Ember Ed.

Social media ads and promoted posts must link to dedicated landing pages or pages on the College's website where consumers have access to the consumer disclosure link, and accreditation and approval statements.

F. Website

The Colleges' websites, sjvc.edu and carrington.edu, were created and are revised constantly to provide relevant information to consumers. The Colleges' websites provide accurate information regarding campus locations and contact details, program information, admission requirements and process, graduate services, financial aid, student outcomes and student life.

Information for the website's program, campus and admissions pages is taken from the Colleges' Catalog and modified to suit an online readership. When catalog content is modified for web use, the Compliance Department reviews to ensure revisions do not compromise compliance or accuracy.

Website content is constantly monitored and updated to reflect the most up-to-date information for prospective students. The Compliance Department will notify the Marketing Department if website content needs to be updated. The Marketing Department will make necessary content updates within three days of notification, with final approval given the Compliance and Regulatory Affairs Department.

Twice a year, in January and July, the Compliance and Marketing Departments will collaborate to perform a comprehensive audit of the Colleges' website against information in the Colleges' Catalog and Catalog Supplement. Content for programs, campuses, admissions, accreditation and approvals, financial aid, etc., is compared to content in the Catalog to ensure consistency, accuracy and compliance.

The Colleges' websites have a student inquiry form placed throughout the sites. The form collects the consumer's first and last name, phone number, email address, and asks that they select the campus and program of interest and gives them the option to receive text messages from the College. The form also has clear and conspicuous disclaimer text (which links to a privacy policy) that

is TCPA compliant and ensures consumers know how and for what purpose their information will be used.

Disclaimer Text

By clicking “The Button”, I expressly authorize (the College), its subsidiaries, affiliates, agents and contractors to contact me regarding educational services via email, telephone (including cellular) or text message – using automated technology– at the email address and phone numbers provided. I understand this consent is not required to attend (the College). I understand message and data rates may apply, and that my consent may be revoked at any time by notifying (the College). View our [privacy policy](#) (hyperlinked to the privacy policy page)

The College websites also feature a blog that highlights student, graduate and faculty stories, as well as campus news and events and resource articles. The website and blog do not mislead potential students with inaccurate information or lofty claims. Instead, the website and blog provide a straightforward image of the College and what is happening at each of the College’s campuses. The Marketing Department works with a content marketing and search engine optimization (SEO) Vendor on content and content optimization for its blog and website landing pages.

There are no hidden, misleading or misrepresenting keywords on the College websites – not in the text or image content, or in the code that is behind the scenes of the design of the website.

If inappropriate, irrelevant or misrepresenting content is discovered on the website, the Marketing Department corrects the content within 24 hours of discovery and notification.

ADVERTISING IN LANGUAGES OTHER THAN ENGLISH

Marketing and communications created in other languages are permitted if the following requirements are met:

English version is routed for Compliance approval.

- A third party, not involved in the development of the piece, must provide the following acknowledgement of accuracy:

The [insert language]-language version of this piece has been developed by [insert name of individual/ agency] and contains the same information as the original English text. Facts and figures have not been modified and are accurate, to the best of our knowledge.

This acknowledgement can be submitted via email. If a hard copy is submitted it must be signed and dated by the reputable person or entity. The marketing or public relations manager/director must retain a copy of the acknowledgement along with the related approval documents for auditing purposes.

- The advertisement must include the following statement:

“The translation is provided as a service for [insert language]-speaking individuals and is for reference only. Should any discrepancies exist between the [insert language] and an English version, the English version prevails. Programs and services are provided only in English.”

- If the equivalent words or meaning are not available when translated, back translation is required and must be approved by Compliance.

PLEASE NOTE – ADDITIONAL CALIFORNIA GUIDANCE

- When advertising in a language other than English, the enrollment agreement, disclosures, and statements shall be available in that language.

USE OF LOGOS, COPYRIGHTED MATERIALS AND TRADEMARKS

The College logos may only be used in jurisdictions where The College is approved to operate. Logo guidelines for Carrington College and downloadable logos are available at brand.carrington.edu/. Logo guidelines for San Joaquin Valley College and downloadable logos will be made available at brand.sjvc.edu.

Copyright notices should be used on all marketing and communications to protect any materials in which the Institution owns the copyright. The Institution automatically owns the copyright in works created by colleagues in the scope of their employment, such as course handouts, shells, course curricula in all formats, websites, etc. and in works made for hire by independent contractors.

STATE SPECIFIC REQUIREMENTS

Arkansas – A school shall not use the words “free” or “guarantee” for advertising or sales promotion purposes.

Arizona – Restricts use of the words “free” and “guarantee” in print materials and advertisements. Consult Regulatory Affairs for guidance.

Florida – An institution shall not use the word “free” or its synonyms in reference to any equipment, tuition, books, or other items in conjunction with recruiting or advertising.

Georgia – The institution does not use the word “free” to describe any item or service included as part of the school’s programs, placement services, preliminary testing or interviews.

Illinois – Use of salary information or dollar figures that are indicative of earning potential for graduates is prohibited.

Louisiana – The word “free” shall not be used for items or services provided “without additional charge,” but only when there is unconditional access without cost or obligation of any type. Almost everything a school offers to its students is normally paid for, at least in part, by students.

Massachusetts – Representing a commodity or service as “free” when in fact such commodity or service is regularly included as part of the course of instruction or service is an unfair and deceptive trade practice.

Oklahoma – Local ads placed in Oklahoma must contain the school name, street address, and phone number.

Utah – An institution does not use such words as “guarantee” or “free” in either its printed publications, television nor radio copy, nor person-to-person solicitations unless such is a fact.

ADMISSIONS STAFF / RECRUITER TITLES

It is a violation of Florida, Massachusetts, Minnesota, Nebraska and Oregon regulations for any agent responsible for recruiting students to use the titles “*counselor*” or “*advisor*,” as these terms imply that the individual recruiter is acting on the students’ behalf instead of the school’s. Admissions staff serving online students must adopt the title **Admissions Representative**.

Marketing and other communication materials used nationally or in FL, MA, MN, NE and OR should contain the term *Admissions Representative*.

ENROLLMENT PROMOTIONS

Colleges considering enrollment promotions to increase the prospects of enrollment must submit to the Compliance and Regulatory Affairs Department prior to the preparation of marketing materials. The use of fee waivers is prohibited in a number of jurisdictions in which Ember Education operates.

States that allow fee waivers			
Arkansas	Kentucky	Nevada	South Dakota
California	Louisiana	New Hampshire	Tennessee
Colorado	Maine	New Jersey	Texas
Delaware	Maryland	New Mexico	Vermont
Guam	Massachusetts	North Carolina	Virgin Islands
Hawaii	Michigan	North Dakota	Virginia
Idaho	Minnesota	Oregon	Washington (state)
Illinois	Mississippi	Pennsylvania	Washington D.C.
Indiana	Missouri	Puerto Rico	Wisconsin
Iowa	Montana	Rhode Island	Wyoming
Kansas	Nebraska	South Carolina	

States that DO NOT allow fee waivers			
Alabama	Connecticut	New York	Utah
Alaska	Florida	Ohio	West Virginia
Arizona	Georgia	Oklahoma	

While some states restrict the waiver of fees, other promotions may be offered.

Note:

- Student referral promotion gifts are prohibited in all states

States that allow other enrollment promotions			
Alabama	Kansas ³	Nebraska	South Dakota
Colorado	Kentucky	Nevada	Texas
Connecticut ¹	Louisiana ²	New Hampshire ¹	Utah ⁷
Delaware	Maine	New Jersey	Vermont
Georgia ²	Maryland	North Carolina	Virgin Islands
Guam	Massachusetts ⁴	North Dakota	Virginia
Hawaii	Michigan	Oregon ⁵	Washington (state)
Idaho	Minnesota	Pennsylvania	Washington D.C.
Illinois	Mississippi	Puerto Rico	West Virginia ⁸
Indiana ³	Missouri	Rhode Island	Wisconsin
Iowa	Montana	South Carolina ⁶	Wyoming

- ¹ Tuition and fees must be uniformly applied to all students within the school and class. Fee waivers are not permitted unless all students within the school and class receive a waiver.*
- ² The institution must not deviate from the advertised cost of programs offered.*
- ³ Scholarships must be bona fide reductions in tuition and issued under specific, published criteria.*
- ⁴ Representing an offer to be limited as to time or otherwise when it is in fact the school's regular offer is an unfair and deceptive trade practice.*
- ⁵ Outside the regular student financial aid process, there shall be no discounting of tuition as an incentive to enroll.*
- ⁶ Total tuition for any specific program shall be the same for all persons enrolled at the same time.*
- ⁷ An institution shall not use loans, scholarships, discounts, or other such enrollment inducements, where such result in unfair or discriminatory practices.*
- ⁸ Schools shall not advertise any tuition, fees, or charges in amounts other than those currently on file with the state or advertise them without showing the total costs.*

States that DO NOT allow other enrollment promotions			
Alaska	California	New York	Tennessee
Arizona	Florida	Ohio	
Arkansas	New Mexico	Oklahoma	

SCHOLARSHIPS

A scholarship is an award of financial aid for a student to further his/her education that does not have to be repaid. Scholarships are awarded based upon various criteria, which usually reflect the values and purposes of the donor or founder of the award.

Scholarships may be implemented when there are specific criteria for student eligibility and selection procedures precisely disclosed within an institution's policy. All students within the enrollment period that the scholarship is offered must be eligible to apply under the same circumstance.

The institution must maintain verifiable records including detailed and complete data when students are granted a scholarship. Records kept on file at the institution for review must include copies of applications, selection committee meeting notes, and copies of scholarship award notices.

Scholarships may not be offered unless they are bona fide awards issued under specific criteria published in the institution's policies. Promotion of scholarships is considered a monetary incentive to enroll, which is prohibited in a number of states. See section XIX. *Enrollment Promotions* for additional guidance on the promotion of scholarships.

USING REFERENCES TO FINANCIAL AID, SCHOLARSHIPS, AND GRANTS IN ADVERTISEMENTS

- Any messaging related to financial aid (including scholarships, grants, etc.) must be approved by Ember Ed Compliance and Regulatory Affairs Department prior to use.
- References to financial assistance availability shall include the phrase, "Student loans, grants, and scholarships are available to those who qualify."
- References to federal financial aid programs may not be combined with information about state grants or institutional aid.
- Ads implying that a prospective student can determine their financial aid eligibility must include the tools to determine eligibility.

- If this information is not immediately available, a Regulatory Affairs-approved email must be sent with the pertinent information within minutes of the prospective student requesting eligibility information.
 - The inquiry form for the original ad must notify the student that the email will be sent.
- Financial aid references must be transparent and may not give an impression that the information is presented by a government entity.
- References to financial aid programs may not imply that all program costs can be covered with financial aid; that financial aid does not include student loans; or that there may be no student payment obligation.
- Marketing materials with scholarship and/or grant messaging should have twice as much content related to the university and its features than the scholarship/grant programs described. This is commonly known as the “2/3rd 1/3rd rule”.
- References to “FAFSA” **must** include the registered trademark symbol (®) at the upper right corner of the trademark, and must include the following statement on the same page that FAFSA is mentioned:
“FAFSA® is a registered trademark of the U.S. Department of Education.”
- If there is more than one term on that particular page, you can simply combine them in the statement.
“FAFSA® and NSLDS® are registered trademarks of the U.S. Department of Education.”

USING MILITARY, VETERANS’ AFFAIRS OR GI BILL® REFERENCES, IN ADVERTISEMENTS OR STUDENT-FACING MATERIALS

- All messaging related to financial aid (including scholarships, grants, etc.) must be approved by the Compliance and Regulatory Affairs Department prior to use.
- All marketing messaging – whether developed internally or by a vendor – must be approved by Regulatory Affairs prior to use.
- Use of the term “GI Bill” is restricted under federal trademark law. The following restrictions apply to preparation of any materials using the term “GI Bill”:
 - Only institutions eligible to receive VA education benefits; state approving agencies; and recognized Veterans service organizations are permitted to use the term “GI Bill.” **No other third-parties may use the term.**
 - Institutions permitted to use “GI Bill” are prohibited from using the term in any manner that directly or indirectly implies a relationship or affiliation with, or endorsement by, the U.S. Department of Veterans Affairs.
 - Use of the term “GI Bill” **must** include the registered trademark symbol (®) at the upper right corner of the trademark.
 - The trademark attribution notice must also be prominently visible: ***“GI Bill® is a registered trademark of the U.S. Department of Veterans Affairs (VA). More information about education benefits offered by the VA is available at the official U.S. government website: www.benefits.va.gov/gibill.”***
 - The registered symbol is not required every time the mark appears in a single document or on a webpage; however, it must appear in the most prominent place at first usage, such as in a title or header/sidebar, as well as in the first use in the text, on all individual documents or webpages.
 - Additional restrictions will be vetted during the Regulatory Affairs review of the materials.

SURVEYS

Compliance and Regulatory Affairs Departmental approval is required for most surveys fielded to prospective students, rejected applicants, students and alumni. Branded surveys of the general public may also require approval prior to fielding.

TESTIMONIALS/ENDORSEMENTS

Testimonials and endorsements encompass both statements made by students and statements made by experts, or organizations, about the institution's programs.

While the promotion of positive comments on social media is an understood practice, ((Yelp!/Google Reviews, "liking a Facebook post," or retweeting a positive remark), the use of testimonials from active students in traditional advertisement is discouraged.

Marketing plans to solicit testimonials for all platforms must be reviewed by the Compliance and Regulatory Affairs Department prior to launch and specific documentation requirements must be followed.

When using testimonials from a named student or alumni, it must be clear that it was not solicited in exchange for preferential treatment, remuneration, or to avoid penalty.

The individual making the testimonial and their affiliation with the college, if any, should be clearly identified.

Student testimonials should include:

- First name, last initial (only)
- Full approved program name
- The designation that they are a Student

Alumni testimonials should include;

- First name, last initial (only)
- Full approved program name
- The designation that they are a Graduate plus the year of graduation

An example of an approved testimonial with the required information listed is shown below.

“

I realized I could help
change someone's smile
and build their
confidence, and having
that confidence could help
lead to more
opportunities in that
person's life."

-MARITZA E.,
DENTAL ASSISTING
STUDENT



* If a photo is included it must be of the actual student providing the testimonial. Where you do not have a photo of the person providing the testimonial but you would still like to include a photo you may use an "obscure" photo. Below are examples of obscure photos that may be acceptable. Please notify compliance when the photos are not of the person providing the testimonial as they will need to be approved.





When using testimonial or endorsement, any “material connections” the institution provides to the endorser must be disclosed (e.g. free product, payment, opportunity to be on television, etc.). One exception is the use of celebrity or sports star to endorse a service. Consumers expect these figures to be paid to offer their endorsement of the institution, so an explicit disclosure may not be needed.

Testimonials claiming specific results usually will be interpreted to mean that the endorser’s experience reflects what others can also expect. Statements like “Results not typical” or “Individual results may vary” won’t change that interpretation. That leaves advertisers with two choices:

1. Have adequate proof to back up the claim that the results shown in the ad are typical, or
2. Clearly and conspicuously disclose the generally expected performance in the circumstances shown in the ad

Testimonials and endorsements made by third parties who are compensated or receive free products and/or services must be disclosed both by the institution and the blogger. The institution is responsible for ensuring the compensated blogger makes the necessary disclosure.

SWEEPSTAKES AND CONTESTS

Sweepstakes and contests may be held for marketing/promotional purposes if the following legal disclosure requirements are met. These disclosures may appear on the document/page in at least ten point font.

A. Sweepstakes

Use the following language when the value of the sweepstakes prize is \$100 or more:

No purchase necessary to enter. Limit one entry per person. Must be 18 or older and a legal resident of the United States to win. Void where prohibited. Odds of winning depend on the number of entrants. Winning entries will be chosen at random from all entries received by the deadline; decision of the Sponsor is final. Entries must be received by (insert date(s)). To review the complete Official Rules, go to (insert link to rules or otherwise indicated where entrants can find rules.) For additional information or a list of winners, contact (insert name).

All requests for sweepstakes must be submitted to Ember Education Legal for review.

B. Contests

Use the following disclosure when the value of a contest prize is \$100 or more:

No purchase necessary to enter. Limit one entry per person. Must be 18 or older and a legal resident of the United States to win. Void where prohibited. Winning entries will be judged and selected from all entries received by the deadline; decision of the judge(s) is final. Entries must be received by (insert date(s)). To review the complete Official Rules, go to (insert link to rules or otherwise indicated where entrants can find rules.) For additional information or a list of winners, contact (insert name).

All requests for contests must be submitted to Ember Education Legal for review.

C. Raffles

Do not refer to promotions as raffles (purchasing a chance to win a prize.) In most jurisdictions, raffles are illegal.

D. Trademarks

If promotional materials describe a trademarked prize, the third-party trademark is required, for example:

iPod is a registered trademark of Apple, Inc. All rights reserved. Apple, Inc. does not endorse, sponsor or supported this (Sweepstakes/Contest – use correct term) in any manner

When a third-party's trademark is used in the text of Official Rules, it must be properly marked – iPod, since this mark is registered. An unregistered mark must be labeled accordingly – Mark TM or Mark SM.

E. Official Rules

Official rules must be published in connection with Sweepstakes or Contests.

Signature lines and opt-in disclaimers are not required on electronic landing pages, business reply cards or other physical marketing pieces. Simply having a prospective student complete these forms establishes a sound business relationship by which admissions representatives can legally call regarding degree programs. This rule applies in all markets and in all states.

F. Contacting Sweepstakes and Contest Entrants

To Contact sweepstakes/contest entrants by phone, follow these requirements to ensure compliance with various telemarketing regulations:

- Sweepstakes and contest entry forms must include an “opt-in” check box.
- Opt-in language must be included on all forms. It must clearly state that the entrant will be contacted via phone by College representatives. Use the following language:

“Yes, please have someone call or email me about (the College) educational programs”

*Modification to this language is permissible, but must state that the school will contact the entrant **by phone**.*

- Contest and sweepstakes entries may not be taken over the phone.
- If an entrant does not wish to be contacted by phone, direct mail or email can be used to contact.

Always check with the Compliance and Regulatory Affairs department before implementing any sweepstakes or contest.

COMPLIANCE MONITORING TOOLS

Ember Ed employs a number of technical resources to ensure clarity and compliance in its marketing communication programs.

A. Inquiry Management

Ember Ed uses a vendor for third-party inquiry management with the primary purpose being to collect and evaluate inquiry performance. Ember Ed meets with Vendor on a weekly basis to review campaign performance.

Once an inquiry is submitted to the Vendor, it is verified against required fields established by Ember Ed and either rejected if they do not meet the necessary criteria or sent through the Ember Ed CMS for follow-up.

B. Lead Quality

Ember Ed uses Vendor to identify non-compliant and/or fraudulent student inquiries from third-party inquiry vendors. Vendor is a neutral arbiter of digital media transactions. It tracks the origin and history of every inquiry the Colleges buy from third-party vendors, and provides a single, common currency for the College to communicate about an inquiry's quality, risk, compliance and validity.

Ember Ed uses Vendor data to reject/scrub inquiries. Ember Ed currently rejects inquiries on the following parameters:

Authenticity	Not Authentic
Age	Greater than 30 seconds old
Fraud	High Risk
Entities	4+
Duration	0-30 seconds, 15 minutes+
Duplicate	30 days

C. Compliance Monitoring

Ember Ed uses a Vendor with a cloud-based compliance platform that automatically monitors the web for full regulatory, brand and TCPA compliance.

A list of banned and required terms have been set up for Vendors to consult. This is set up on Vendor's end and can be modified at any time.

When an infraction is flagged on a landing page, an alert is created in the Vendor's platform dashboard. The Marketing Department logs into Vendor's platform dashboard regularly (at a minimum one time per week) to review any news alerts and take necessary remediation steps.

When it is determined that an infraction has been identified, an email is sent immediately to the third-party from the Vendor's platform. This email includes the URL where the infraction was found along with the item(s) needing correction. The remediation timeline is as follows:

- 1st Notice (Day 1): Third-party vendors have 24 hours to respond to the 1st Notice email with acknowledgement of the infraction and action items including timeline for correction.
- 2nd Notice (Day 2): If the third-party vendor has not responded after the first 24 hour period and the infraction still exists, another email is sent to the third-party vendor with notification that the campaign is paused until corrective action is taken. If the infraction has been updated, it's resolved in the system.

APPENDIX

A. San Joaquin Valley College State Approvals

The statement approved for each state approving agency is provided to the Marketing Department by the Compliance and Regulatory Affairs Department. Once the marketing department receives an updated statement, the staff re-publishes the information provided on its website and landing pages within three days of notification.

The Colleges publish the following approved statement(s) in its catalog, and on its website, landing pages and brochures to provide consumers with accurate California state approval information.

CALIFORNIA

This institution is a private institution and is approved to operate as an accredited institution by the California Bureau of Private Postsecondary Education (BPPE). Approval to operate means that (the College) has been found in compliance with the standards set forth in the California Private Postsecondary Education Act of 2009 (as amended) and Title 5, Division 7.5, - Private Postsecondary Education of the California Code of Regulations. As a prospective student, you are encouraged to review this catalog prior to signing an enrollment agreement. You are also encouraged to review the School Performance Fact Sheet, which must be provided to you prior to signing an enrollment agreement.

The College also publishes approvals by state on its website. As information for each state is available from the Compliance and Regulatory Affairs Department, specific statements by state are added/updated by the marketing staff within three days.

Other states:

FLORIDA

SJVC is licensed by the Commission for Independent Education, Florida Department of Education, to deliver education in the State of Florida. Additional Information regarding this institution may be obtained by contacting the Commission at 325 West Gaines Street, Suite 141, Tallahassee, FL 32309-0400, toll-free telephone number (888) 224-6684.

GEORGIA

If a student is unsatisfied by SJVC's resolution of a complaint or does not wish to file a complaint through the College's internal processes, they may instead submit a complaint to the Nonpublic Postsecondary Education Commission of the State of Georgia. The procedure is described and the forms provided at this address: gnpec.org/consumer-resources/gnpec-authorized-school-complainant-form/

MARYLAND

SJVC is registered with the Maryland Higher Education Commission for its fully online programs. For students residing in Maryland, SJVC is subject to investigation of complaints by the Office of the Attorney General or the Maryland Higher Education Commission. Complaints should be directed to:

Maryland Attorney General
Consumer Protection Division
200 St. Paul St.
Baltimore, MD 21202
410-528-8662/888-743-0823 (toll free)

TEXAS

San Joaquin Valley College is not regulated in Texas under Chapter 132 of the Texas Education Code.

Grievances

SJVC has established the General Student Grievance Policy in order to provide for the prompt, effective, and equitable resolution of student grievances not governed by a specific policy of procedure. Under the provisions of the General Student Grievance Policy, students have the right to submit grievances, have their grievances considered by Campus Administration, and be notified of the College's decision on the grievance. A full description of the General Student Grievance Policy is published in the Student Handbook. Any questions or additional information concerning this policy should be directed to Campus Administration.

Complaints

Students who are citizens of California can file a complaint with the Bureau of Private Postsecondary Education, under the California Department of Consumer Affairs.

Bureau for Private Postsecondary Education

2535 Capitol Oaks Drive, Suite 400

Sacramento, CA 95833

Telephone: (916) 431-6924

Fax: (916) 263-1897

http://www.bppe.ca.gov/forms_pubs/complaint.pdf

Any student of the college can file a complaint through the WASC Senior College and University Commission.

WASC Senior College and University Commission (WSCUC)

985 Atlantic Avenue, Suite 100, Alameda, CA 94501

(510)748-9001

<https://www.wscuc.org/>

WASHINGTON

San Joaquin Valley College is authorized by the Washington Higher Education Coordinating Board (HECB) and meets the requirements and minimum educational standards established for degree-granting institutions under the Degree-Granting Institutions Act. This authorization is subject to periodic review and authorizes San Joaquin Valley College to offer field placements within the following degree program: Associate of Science in Clinical Medical Assisting. Authorization by the HECB does not carry with it an endorsement by the board of the institution or its programs. Any person desiring information about the requirements of the act or the applicability of those requirements to the institution may contact the HECB at P.O. Box 43430, Olympia, WA 98504-3430.

B. San Joaquin Valley College Programmatic Accreditation and Approvals

Aviation Maintenance Technology

The Aviation Maintenance Technology program is approved by the Federal Aviation Administration, U.S. Department of Transportation.

Flight Standards District Office
4955 E. Anderson Ave., Ste. 110
Fresno, CA 93727
(559) 454-0286 | <http://www.faa.gov>

Criminal Justice: Corrections

SJVC's Criminal Justice: Corrections program is certified to provide instruction by the Board of State and Community Corrections (BSCC)/Standards & Training for Corrections (STC) and the Bureau of Security and Investigative Services (BSIS).

Board of State and Community Corrections (BSCC)/Standards & Training for Corrections (STC)
600 Bercut Drive
Sacramento, CA 95811
(916) 445-5073 | http://www.bscc.ca.gov/s_standardsandtrainingforcorrections.php

Bureau of Security and Investigative Services
PO Box 980550
West Sacramento, CA 980550
(800) 952-5210 | <http://www.bsis.ca.gov>

Dental Assisting

The SJVC Dental Assisting program is approved by the Department of Consumer Affairs, Dental Board of California.

Dental Board of California
2005 Evergreen Street, Ste. 1550
Sacramento, CA 95815
(916) 263-2300 | <http://www.dbc.ca.gov>

Dental Hygiene

The Dental Hygiene program is accredited by the Commission on Dental Accreditation and has been granted the accreditation status of "approval without reporting requirements." The Commission is a specialized accrediting body recognized by the United States Department of Education.

Commission on Dental Accreditation
211 East Chicago Ave
Chicago, IL 60611-2678
(312) 440-2500 | <http://www.ada.org/en/home-ada/coda>

Registered Nursing

San Joaquin Valley College's RN program is approved by the California Board of Registered Nursing (BRN).

Board of Registered Nursing
1747 North Market Blvd., Ste. 150
Sacramento, CA 95834
(916) 322-3350 | <http://www.rn.ca.gov/>

Respiratory Therapy

The Respiratory Therapy program has been granted continuing accreditation by the Commission on Accreditation for Respiratory Care (CoARC), 1248 Harwood Road, Bedford TX 76021, 1-817-283-2835.

Surgical Technology

The Surgical Technology program on the Bakersfield and Fresno campuses is accredited by the Commission on Accreditation of Allied Health Education Programs (CAAHEP) in cooperation with the Accreditation Review Council on Education in Surgical Technology and Surgical Assisting (ARC-STSA). The Surgical Technology program on SJVC's Rancho Cordova and Temecula campuses is new and not yet accredited. The campuses are in the process of seeking accreditation.

ARC-STSA
6 W. Dry Creek Circle, Ste. 110
Littleton, CO 80120
(303) 694-9262 | <http://www.arcstsa.org/>

CAAHEP
25400 US Highway 19 N, Suite 158
Clearwater, FL 33763
(727) 210 2350 | <http://www.caahep.org>

Vocational Nursing

The Licensed Vocational Nursing program is approved by the California Board of Vocational Nursing and Psychiatric Technicians (BVNPT).

BVNPT
2535 Capital Oaks Dr., Ste. 205
Sacramento, CA 95833
(916) 263-7800 | <http://www.bvnpt.ca.gov>

C. Carrington College State Agency Approvals

ARIZONA

Arizona campuses are licensed by the Arizona State Board for Private Postsecondary Education. Inquiries concerning the standards or school compliance may be directed to the Board at 1740 West Adams Street, #3008, Phoenix, AZ 85007, 602 542 5709, website: www.azppse.gov

For student complaints that cannot be resolved after exhausting the Institution's grievance procedure, students may file a complaint with the Arizona State Board for Private Post-Secondary Education. Students must contact the State Board for further details. The State Board address is: 1740 West Adams Street, #3008, Phoenix, AZ 85007. Phone: 602 542 5709, website: www.azppse.gov.

IDAHO

The Carrington College Boise campus is registered with the Idaho State Board of Education under Idaho Statutes Title 33, Chapter 24. Board offices: 650 West State Street, Suite 307, PO Box 83720, Boise, ID 83720 0037, 208 334 2270, boardofed.idaho.gov

NEVADA

The Nevada campuses are licensed by the Nevada Commission on Postsecondary Education. Inquiries concerning the standards or school compliance may be directed to the Commission at 8778 S. Maryland Pkwy., Suite 115, Las Vegas, Nevada 89123, 702 486 7330, www.cpe.nv.gov

Students not satisfied with the final disposition of a grievance may contact the State of Nevada licensing authority.

Nevada Student Indemnification Fund Nevada operates a student indemnification fund which may be used to indemnify any student or enrollee who has suffered damage as a result of the discontinuance of operation of a postsecondary educational institution licensed in Nevada or the violation by a Nevada institution of any provision of the Nevada Revised statutes (394.383 to 394.560) or the regulations adopted pursuant thereto. The existence of this account does not create a right in any person to receive money from the account.

NEW MEXICO

The Albuquerque campus is licensed by the New Mexico Higher Education Department. Inquiries concerning the standards or school compliance may be directed to the Department at 2044 Galisteo Street Suite 4, Santa Fe, NM 87505, 505 476 8400, www.hed.state.nm.us.

OREGON

Carrington College is a business unit of a corporation and is authorized by the State of Oregon to offer and confer the academic degrees and certificates described herein, following a determination that state academic standards will be satisfied under OAR 583 – 030. Inquiries concerning the standards or school compliance may be directed to the Office of Degree Authorization, 775 Court St. NE, Salem, Oregon 97301.

TEXAS

Carrington College is not regulated in Texas under Chapter 132 of the Texas Education Code.

Grievances

Carrington College has established the General Student Grievance Policy in order to provide for the prompt, effective, and equitable resolution of student grievances not governed by a specific policy of procedure. Under the provisions of the General Student Grievance Policy, students have the right to submit grievances, have their grievances considered by Campus Administration, and be notified of the College's decision on the grievance. A full description of the General Student Grievance Policy is published in the Student Handbook. Any questions or additional information concerning this policy should be directed to Campus Administration.

Complaints

Any student of the college can file a complaint through the Accrediting Commission for Community and Junior Colleges, of the Western Association of Schools and Colleges.

Accrediting Commission for Community and Junior Colleges

Western Associate of Schools and Colleges

10 Commercial Boulevard, Suite 204

Novato, CA 94949

Telephone: (415) 506-0234

Fax: (415) 506-0238

<http://www.accjc.org/complaint-process>

WASHINGTON

The Carrington College Spokane campus is licensed under Chapter 28C.10 RCW. Inquiries or complaints regarding this private vocational school may be made to the Workforce Training and Education Coordinating Board, 128 10th Avenue SW, PO Box 43105, Olympia, WA 98504, 360 709-4600, wtb.wa.gov, email: wtecb@wtb.wa.gov.

OTHER STATES

Georgia

Grievance Policy

The student has the right to appeal all unresolved matters or the final institutional decision to:

The State of Georgia Nonpublic Postsecondary Education Commission

2082 East Exchange Place, Suite 220

Tucker, Georgia 30084

(770) 414-3300

<https://qnpec.georgia.gov/>

Minnesota

Carrington College is registered with the Minnesota Office of Higher Education pursuant to Minnesota Statutes sections 136A.61 to 136A.71. Registration is not an endorsement of the institution. Credits earned at the institution may not transfer to all other institutions.

Nebraska

If a student has a complaint regarding a private postsecondary career school that is overseen by the Nebraska Department of Education (NDE)-Private Postsecondary Career Schools, he/she should contact NDE at (402) 471- 4825 301 Centennial Mall South P.O. 94987 Lincoln, NE 68509-4987 or <https://ccpe.nebraska.gov/studentcomplaints-against-postsecondary-institutions>.

D. Carrington College Programmatic Accreditation and Approvals

DENTAL

The Dental Board of California, 2005 Evergreen Street, Suite 1550, Sacramento, CA 95815, 877 729 7789, <http://www.dbc.ca.gov>, approves the Carrington College Dental Assisting programs at the Citrus Heights, Pleasant Hill, Pomona, Sacramento, San Jose, San Leandro and Stockton campuses.

The Dental Assisting certificate program at the Boise campus is accredited by the Commission on Dental Accreditation (CODA). The Commission is a specialized accrediting body recognized by the United States Department of Education. The Commission on Dental Accreditation can be contacted at 312 440 4653 or at 211 East Chicago Avenue, Chicago, IL 60611-2678. The Commission's web address is ada.org/en/coda.

Note: The Commission on Dental Accreditation will review complaints that relate to a program's compliance with the accreditation standards. The Commission is interested in the sustained quality and continued improvement of dental and dental-related education programs but does not intervene on behalf of individuals or act as a court of appeal for treatment received by patients or individuals in matters of admission, appointment, promotion or dismissal of faculty, staff or students.

The Dental Hygiene programs at the Boise, Mesa, Sacramento and San Jose campuses are accredited by the Commission on Dental Accreditation. The Commission is a specialized accrediting body recognized by the United States Department of Education. The Commission on Dental Accreditation can be contacted at 312 440 4653 or at 211 East Chicago Avenue, Chicago, IL 60611-2678. The Commission's web address is <http://www.ada.org/en/coda>.

MASSAGE THERAPY

The Stockton campus is a California Massage Therapy Council approved school (CAMTC Approved School Number SCH0078). Pursuant to California Business and Professions Code section 4611, it is an unfair business practice for a person to do any of the following:

- a. To hold himself or herself out or to use the title of "certified massage therapist" or "certified massage practitioner," or any other term, such as "licensed," "certified," "CMT," or "CMP," in any manner whatsoever that implies or suggests that the person is certified as a massage therapist or massage practitioner, unless that person currently holds an active and valid certificate issued by the California Massage Therapy Council.
- b. To falsely state or advertise or put out any sign or card or other device, or to falsely represent to the public through any print or electronic media, that he or she or any other individual is licensed, certified or registered by a governmental agency as a massage therapist or massage practitioner. A student or any member of the public with questions that have not been satisfactorily answered by the school or who would like to file a complaint about this school may contact the California Massage Therapy Council at One Capitol Mall, Suite 320, Sacramento, CA 95814, <http://www.camtc.org/>, phone (916) 669-5336, or fax (916) 669-5337.

Carrington College, registration number 043, is authorized to provide massage therapy instruction with the State of New Mexico Massage Therapy Board under the registration category RMTS.

MEDICAL ASSISTING

The Medical Assisting certificate programs at the Citrus Heights, Pleasant Hill, Portland, Sacramento, San Jose, San Leandro and Stockton campuses are accredited by the Commission on Accreditation of Allied Health Education Programs (CAAHEP) upon the recommendation of the Medical Assisting Education Review Board (CAAHEP, 25400 US Highway 19 North, Suite 158, Clearwater, FL 33763, 727 210 2350, caahep.org).

The Medical Assisting certificate programs at the Boise, Mesa, Phoenix North, Spokane and Tucson campuses are accredited by the Accrediting Bureau of Health Education Schools (ABHES), 7777 Leesburg Pike, Suite 314 N, Falls Church, VA 22043, 703 917 9503. The Bureau's web address is: abhес.org

MEDICAL RADIOGRAPHY

The Medical Radiography program at the Spokane campus is accredited by the Joint Review Committee on Education in Radiologic Technology, 20 North Wacker Drive, Suite 2850, Chicago, IL 60606–3182, 312 704 5300, jrcert.org, e-mail: mail@jrcert.org.

NURSING

The Arizona Board of Nursing certifies that Mesa, Phoenix East, and Tucson campuses have satisfactorily fulfilled requirements and are granted full approval. Board offices: 1740 West Adams Street, Suite 2000, Phoenix, AZ 85007, 602 771 7800.

The Registered Nursing program at the Phoenix East campus is accredited, with conditions, by the Accreditation Commission for Education in Nursing (ACEN), 3343 Peachtree Road NE, Suite 850, Atlanta, Georgia 30326, 404 975 5000, www.acenursing.org.

The California Board of Registered Nursing, PO Box 944210, Sacramento, CA 94244–2100, 916 322 3350, <http://www.rn.ca.gov/index.shtml>, approves the Registered Nursing LVN to RN program at the Sacramento campus.

The Vocational Nursing program at the Sacramento campus is approved and the Vocational Nursing program at the San Jose campuses have provisional approval by the Board of Vocational Nursing and Psychiatric Technicians, 2535 Capitol Oaks Drive, Suite 205, Sacramento, CA 95833, 916 263 7800, www.bvnpt.ca.gov.

Carrington College holds full approval for its Practical Nursing program and its associate degree professional nursing education program. The Idaho Board of Nursing issued a certificate of approval. Board offices: 280 North 8th Street, Suite 210, P.O. Box 83720, Boise, ID 83720 – 0061, 208 334 3110, www.ibn.idaho.gov.

The Practical Nursing program at the Boise campus is accredited by the Accreditation Commission for Education in Nursing (ACEN), 3343 Peachtree Road NE, Suite 850, Atlanta, Georgia 30326, 404 975 5000, www.acenursing.org.

Carrington College holds approval for the Reno campus from the Nevada State Board of Nursing, 2500 W. Sahara Ave., Suite 207, Las Vegas, NV 89102 – 4392, 702 486 5800, 888 590 6726 (toll free), www.nursingboard.state.nv.us. Upon graduation from the Registered Nursing program, students are eligible to sit for the state licensing exam, which is required to achieve the Registered Nurse licensure.

The Registered Nursing program at the Reno campus is accredited by the Accreditation Commission for Education in Nursing (ACEN), 3343 Peachtree Road NE, Suite 850, Atlanta, Georgia 30326, 404 975 5000, www.acenursing.org.

The New Mexico Board of Nursing certifies that Carrington College is granted full approval in the State of New Mexico, 6301 Indian School NE, Suite 710, Albuquerque, NM, 87110 505 841 8340, bon.state.nm.us.

The Registered Nursing program at the Albuquerque campus is a candidate for accreditation by the Accreditation Commission for Education in Nursing (ACEN), 3343 Peachtree Road NE, Suite 850, Atlanta, Georgia 30326, 404 975 5000, www.acenursing.org

The Board of Nursing for the State of Texas granted initial approval for Carrington College Mesquite to offer an Associate of Science in Nursing Degree in the State of Texas, 333 Guadalupe Street, Austin, Texas 78701, www.bon.texas.gov/.

PHARMACY TECHNOLOGY

The Pharmacy Technology programs at the Albuquerque, Boise, Citrus Heights, Mesa, Pleasant Hill, Phoenix East, Portland, Sacramento, San Jose, San Leandro, Spokane, Stockton, and Tucson campuses are accredited by the American Society of Health System Pharmacists, 7272 Wisconsin Avenue, Bethesda, MD 20814, 301 657 3000, <https://www.ashp.org/Professional-Development/Technician-Program-Accreditation>.

PHYSICAL THERAPIST ASSISTANT

The Physical Therapist Assistant programs at the Boise, Las Vegas, Mesa and Pleasant Hill campuses are accredited by the Commission on Accreditation in Physical Therapy Education (CAPTE), 1111 North Fairfax Street, Alexandria, VA 22314; telephone: 703-706-3245; email: accreditation@apta.org; website: <http://www.capteonline.org>. If needing to contact the program/institution directly, please call 1-877-623-1442 or email contactcenter@carrington.edu.

RESPIRATORY THERAPY

The Respiratory Care Associate of Science degree programs at the Las Vegas (#200536), Phoenix East (#200390) and Pleasant Hill campuses (#200542) are accredited by the Commission on Accreditation for Respiratory Care: <http://www.coarc.com>.

SURGICAL TECHNOLOGY

The Surgical Technology programs at the Citrus Heights and San Jose campuses are accredited by the Commission on Accreditation of Allied Health Education Programs (CAAHEP) upon the recommendation of the Accreditation Review Council on Education in Surgical Technology and Surgical Assisting, (CAAHEP, 25400 US Highway 19 North, Suite 158, Clearwater, FL 33763, 727 210 2350, www.caahep.org). The program at the Citrus Heights campus has been placed on Probationary Accreditation as of September 16, 2016.

VETERINARY TECHNOLOGY

The Veterinary Technology programs at the Citrus Heights, Pleasant Hill, Pomona, Sacramento, San Jose, San Leandro and Stockton campuses are accredited by the American Veterinary Medical Association as a program for educating veterinary technicians, <http://www.avma.org/professionaldevelopment/education/accreditation/programs/pages/default.aspx>.

E. Vendors

- i. Agency Vendor for SEM, SEO: DoublePositive
- ii. Email Marketing Vendors – [Mail Chimp](#); [Mandrill](#)
- iii. Student Relationship Management Vendors – [Velocify](#); [CampusNexus](#); [Sparkroom](#)
- iv. Email Verifying Vendor – [Quick Email Verification](#)
- v. SMS Vendor – Velocify
- vi. Search/Display Advertising Platforms - [Google Adwords](#), [Google Display Network](#) & [Bing Ads](#)
- vii. Content Marketing and SEO Vendor – [Vertical Measures](#)
- viii. Lead Quality Vendor – [Jornaya](#) (formerly LeadID)
- ix. [Performline](#), creator of [PerformMatch](#)

F. Facebook Terms of Use

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