### Introduction

The Ember Education Compliance & Regulatory Affairs Department (CRA) is excited to partner with the Marketing department and campus-staff on the promotion of local news and events at each location of the Colleges it serves. Platforms like Facebook, Twitter, LinkedIn, and Instagram provide a tremendous opportunity to celebrate the achievements of students and staff, spotlight collaborations with local businesses, and publicize the community engagement at each campus.

At the same time, these platforms are also public forums in which we need to tread carefully to not post information that could share proprietary intellectual property to other schools, include the image or statements of individuals that have not released the school to do so, or generally cast the College in a negative light. Ember CRA believes that it is most unlikely that any campus staff would actively seek to share information that could expose the school to risk, but some well-intentioned actions can have unintended consequences.

For instance, posting photos of a birthday celebration on campus, in which a student's full name is included, along with their age on a balloon, or number-shaped candles on a cake can reveal two pieces of personal identifiable information for that individual. Or sharing that all of the students in a Respiratory Therapy cohort, set to graduate on a set date all passed their licensing exam in their first attempt is sharing student-level performance data for a group of students.

That is why Ember CRA has put together the following guidelines to help navigate what can be shared on social media, what cannot be shared on social media, and when to seek assistance when it is not clear.

### Types of Material/Content That Must Be Submitted for Compliance

### Review

 Posts that include inquiry or enrollment-driving language or images, including, but not limited to, upcoming start dates, events, and statements such as "Stop in today," "Give us a call," or "Classes start soon."

- Posts that include detailed program information, including course length, tuition, time to complete, credentials, course credits, or specific details about course content (i.e. benefits of massage therapy, how to perform a blood draw, etc.).
- Posts that include mention of any regulator, accreditor, government official or entity
- Posts that include mention of student financial aid
- Student and colleague testimonials
- Posts that include student data
- Posts that include student outcomes

#### Do not

- Post salary or Bureau of Labor Statistics (bls) information
- Mention other institutions

### General Guidelines

For any additional questions that are not covered below or for posts that need to be compliance approved please send a request to Ali Lebo– Marketing Coordinator at <u>Ali.Lebo@embered.com</u>

#### Post Valuable Content

- Post content that is valuable to prospective, current students, and colleagues. This is best
  accomplished by posting photos and videos that highlight campus culture. Campus content will
  enable prospective students to see what life is like at the campus.
- Campus social media accounts are *not* intended to advertise the college. The purpose of the campus's social media pages are to demonstrate campus culture and engage prospective students, current students, and colleagues in a shared online space.

#### **Content Accuracy**

- Spelling, grammar, and punctuation should positively reflect on the college as a higher education institution. All copy should use complete, descriptive sentences.
- Review all content multiple times prior to publishing or submitting for compliance review.

- When referencing program names use complete approved program name as listed in the college catalog.
- When referring to students in the classroom do not use phrases such as "our medical assistants" or "future registered nurses". Instead use phrases such as "[full program name] students".

#### Confidentiality

- Do not reveal confidential institutional information. This includes strategic plans, budget figures, organization development plans, academic information, unpublished financial results, enrollment figures, etc.
- When revealing personal employee or student information, we must acquire written consent in advance and abide by FERPA, HIPAA, and other laws mandating nondisclosure of personal information.
- Acquire permission. Ask students before posting photos or videos of them online.
- Obtain written consent before disclosing student or graduate employment locations.

#### **Respect Intellectual Property**

• Do not copy and paste material from another web site or publication. This includes photos, text, videos, memes, or graphics found via Google search. Use original content.

#### Communicate Responsibly, Professionally, and Appropriately

- Exercise caution with copy. Avoid exaggeration, guesswork, and derogatory remarks or characterizations.
- Ask yourself: how does the content reflect on the college? Weigh whether a particular post puts colleague or institutional effectiveness at risk.
- Keep it professional/do not "follow" students. Appropriate pages to follow include: Extern Sites, Community Partners, and Local Businesses. Reach out to Marketing for approval to follow additional pages.
- Commenting or responding to individual questions or comments should be limited to the items listed below. "Liking" and retweeting are ok.

- WHERE ARE YOU LOCATED? Sample pre-approved reply: Hi {name}, thank you for your interest in [insert college name]! Our [insert location name] location is at [insert address]. To learn more about this campus click here >> [insert location link].
- GENERAL ADMISSIONS QUESTION? Sample pre-approved reply: Hi {name}, thank you for your interest in [insert college name]! For more information, please call [insert location phone] to speak with a representative.
- WHAT PROGRAMS DO YOU OFFER? Sample pre-approved reply: Hi {name}, thank you for your interest in [insert location name]! For a complete list of our programs, please visit our website here >> [insert location link] or give us a call [insert location phone number].
- COMPLAINT (through private message). Sample pre-approved reply: Hello, we are so sorry to hear you are frustrated, and we are happy to help resolve this! Please reply with the name you are registered under, program, and email, and we will have someone reach out to you ASAP! Thank you and have a great day! DO NOT counsel in ANY WAY via social media, just direct the traffic.
- COMPLAINT or NEGATIVE COMMENTS (on the campus page). DO NOT RESPOND, reach out to Marketing for guidance.
- REQUEST FOR TRANSCRIPTS-Carrington College. Pre-approved reply for Carrington
   College requests: Hello, We'd be happy to help. Please access the transcript request
   form at <a href="https://carrington.edu/admissions/alumni/">https://carrington.edu/admissions/alumni/</a> Thank you!
- REQUEST FOR TRANSCRIPTS-**SJVC**. Pre-approved reply for SJVC requests: Hello, We'd be happy to help. Please access the transcript request form at\_
   <u>https://www.sjvc.edu/career-and-student-services/transcript-request/</u> Thank you!
- AD COMMENT- "SIGN ME UP!" Sample pre-approved reply: Hi {name}, thank you for your interest in [insert college name]! For more information, please call [insert location phone] to speak with a representative.

- WHAT DO I NEED TO GET IN? Sample pre-approved reply: Hi there! We would love for a representative to provide you with all of the specifics for your program of interest, as admissions can vary by program and levels. Give us a call at [location phone number].
- Only appropriate content should be used. Inappropriate content includes, but is not limited to:
  - Content that can be interpreted or perceived to be obscene, defamatory, or unlawful.
  - Content that is disrespectful or has an aggressive tone.
  - Content that contains vulgarity or profanities.
  - Content that contains nudity, violence, or graphic medical imagery.
  - Content that could be interpreted as racist, bigoted, or demeaning to an individual, group, or organization.
  - Content such as narcotics, drinking or illegal activities.
  - Political or contentious topics. Social media is designed to encourage two-way communication. Content and language should not alienate or discourage any user from engaging with published content. Derogatory or discriminatory language (including comments about sex, age, race, sexual orientation, religious affiliation, or political beliefs) are not tolerated and will be deleted.
  - Any content that shows the college, its students, or its colleagues in a negative light (i.e. Students sleeping or on their phone in class, students or colleagues disrespecting the academic environment or facilities, photos of students misusing or goofing off with educational or medical tools, challenge videos that contain humorous but inappropriate content).