



**MARKETING COMMUNICATIONS & REGULATORY COMPLIANCE POLICY
& PROCEDURE GUIDELINES**

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Contents

- INTRODUCTION 5
- GENERAL PURPOSE 5
- MARKETING AND COMMUNICATION REGULATIONS 5
 - A. Advertising and Communication..... 5
 - B. General Requirements 6
 - C. Prohibited Activities..... 6
 - D. PROGRAM NAMES 7
 - E. CAMPUS/LOCATION REFERENCES 7
 - F. TIME TO COMPLETE 8
 - G. THIRD-PARTY SOURCES..... 8
- STUDENT CONSUMER INFORMATION AND DISCLOSURE REQUIREMENTS..... 8
 - A. Required Disclosure Documents..... 8
 - B. Student Consumer Information Statement 9
 - C. Disclaimer Text/TCPA..... 9
- ACCREDITATION 10
 - A. Institutional..... 10
 - B. Programmatic..... 10
- TRADITIONAL ADVERTISING..... 11
 - A. Television and Radio 11
 - B. Billboard, Signs and Banners..... 11
 - C. Print..... 11
 - 1. Magazine/Newspaper 11
 - 2. Phone Books/Directories 11
 - D. Social Media/Ad Copy 12
- PROGRAM BROCHURES 12
- INTERACTIVE ADVERTISING 12
 - A. Affiliate..... 12
 - 1. Compliance Requirements..... 12
 - 2. New Inquiry Providers..... 12
 - 3. Inquiry Provider Onboarding 13
 - B. Email Marketing 13
 - C. Text Message 14

D. Paid Search/Display.....	14
E. Social Media.....	15
F. Website.....	16
ADVERTISING IN LANGUAGES OTHER THAN ENGLISH.....	17
USE OF LOGOS, COPYRIGHTED MATERIALS AND TRADEMARKS.....	18
STATE SPECIFIC REQUIREMENTS.....	18
ADMISSIONS STAFF / RECRUITER TITLES.....	18
ENROLLMENT PROMOTIONS.....	19
SCHOLARSHIPS.....	20
USING REFERENCES TO FINANCIAL AID, SCHOLARSHIPS, AND GRANTS IN ADVERTISEMENTS.....	20
USING MILITARY, VETERANS' AFFAIRS OR GI BILL® REFERENCES, IN ADVERTISEMENTS OR STUDENT-FACING MATERIALS.....	21
SURVEYS.....	22
TESTIMONIALS/ENDORSEMENTS.....	22
SWEEPSTAKES AND CONTESTS.....	24
A. Sweepstakes.....	24
B. Contests.....	25
C. Raffles.....	25
D. Trademarks.....	25
E. Official Rules.....	25
F. Contacting Sweepstakes and Contest Entrants.....	25
COMPLIANCE MONITORING TOOLS.....	26
A. Inquiry Management.....	26
B. Lead Quality.....	26
APPENDIX.....	28
A. San Joaquin Valley College State Disclosures.....	28
B. Programmatic Accreditation and Approvals.....	30
C. Carrington College State Disclosures.....	30
ARIZONA.....	30
ALASKA.....	30
CALIFORNIA.....	30
DISTANCE EDUCATION.....	31
GEORGIA.....	31

IDAHO.....	31
IOWA.....	32
NEVADA.....	32
NEW MEXICO	32
OREGON	32
TEXAS	32
WASHINGTON	33
D. Facebook Terms of Use.....	34

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 Ed marketing and Communication Policy Manual.

A. Advertising and Communication

Advertising and communication include any print, published, recorded, broadcast, electronically transmitted, or publicly 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, Signage, Posters
- Blogs
- Brochures
- 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)
- Catalogs and other school publications
- Magazine and newspaper ads
- PowerPoint presentation and training decks, including talking points
- Press releases and announcements
- Radio, video and television scripts prior to recording
- Student Finance, Enrollment Services, and other presentations and scripts
- 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.

C. Prohibited Activities

The Colleges’ promotional materials:

- Will not use placement rates or use the language “job placement”.
- Will not reference salary.
- Will not reference growth within a career field.
- Will not falsely imply that education is “needed”, “required”, “necessary”, etc. for a specific career outcome.
- 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 wording such as “guarantee” and “free.”

- Will not use reference to in-demand career outcomes
- Will not refer to online programs as 100% online, instead use the language “fully online”.
- Will not compare CC/SJVC with 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 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.

Alternate naming conventions for programs are allowable if the full approved program name is also included in the piece. Examples include Registered Nursing, Medical Assistant, and Veterinary Assistant. When referencing alternate naming conventions, refrain from combining a vocational outcome (such as Registered Nurse, Medical Assistant, Veterinary Assistant) and college specific terms such as “school”, “program”, or “courses” in the same sentence. See examples below:

Avoid: Carrington College is a trusted Registered Nurse School.

Allowable: Carrington College is a trusted Registered Nursing School.

Avoid: Registered Nurse Program.

Allowable: Registered Nursing program in Visalia.

References to “training” or “career” can include the vocational outcome such as:

- Medical Assistant training at Carrington College.
- Vet tech training available.
- Train to become a Registered Nurse.

Generally understood abbreviations may be used when referring to programs, such as HVAC-R, DH and VN, so long as the full program name appears in the ad copy and preferably as the first mention of the program name.

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.

E. CAMPUS/LOCATION REFERENCES

When referring to the name of a campus, please follow the guidelines below:

- Do not refer to the **Glendale Learning Center** (GLC) as a campus. GLC is not approved as a full campus and should be referred to as a **location**.
- Do not refer to online offerings as Carrington College Online. You may use phrases such as Carrington College’s Online Division, SJVC’s online Information Technology program, and Carrington College offers Medical Assisting online.

- Reference to Lancaster Campus is acceptable. It is interchangeable with Antelope Valley. The same allowance is allowed for Hesperia/Victor Valley and Modesto/Salida.
- Campus/Location names should be capitalized.

F. TIME TO COMPLETE

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.” This approach is ok for all programs.

The use of phrases like “Become a medical assistant in as few as 9 months”, “You could be working as an IT professional in about 9 months”. This approach is ok for most programs.

Examples of exemptions include:

- Programs that prepare graduates for careers that require licensure or certification to practice. “Become a registered nurse in as few as 23 months” is not accurate because after the program is completed it takes additional time to pass an exam and apply for licensure. This is applicable to Diagnostic Medical Sonography, Respiratory Therapy, Surgical Technology, Radiologic Technology, Physical Therapist Assistant, Dental Hygiene, and all nursing programs.
- The state of Arizona prohibits the use of phrases that imply that a student can become an **electrician** in as few as 10 months. There are steps after completion of the Electrical Technology program that are required to work as an electrician. In Arizona, phrases like “Become an electrician in about 10 months” is prohibited. Phrases like “**Become an electrical technician** in as few as 10 months” and “**Train to become an electrician** in as little as 10 months” is permitted.

Program lengths are approved by weeks. When converting weeks to months, please use the ratio of 4.33 weeks per month (always rounding up). 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.

G. 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 Online](#) 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 other published pieces please cite the original source and not the other piece.

STUDENT CONSUMER INFORMATION AND DISCLOSURE REQUIREMENTS

A. Required Disclosure Documents

- **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.

- **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.

B. Student Consumer Information Statement

All advertisements must include a prominent mention of the Student Consumer Information (SCI) statement which includes a link to the (SCI) webpage on the institutional website. The options for this statement include "Visit (consumer info url) for information on program outcomes.", "For information about student outcomes visit (consumer information URL)." 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.

Consumer information links:

- San Joaquin Valley College - consumerinfo.sjvc.edu
- Carrington College - carrington.edu/sci

C. Disclaimer Text/TCPA

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 shown below:

By clicking the "button" button, I expressly authorize (the College) and its parent company San Joaquin Valley College, Inc., their 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 form in which it is embedded, such as "get started" or "request information", or alternately the statement "By submitting this form "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.

ACCREDITATION

A. Institutional

Institutional accreditation statements are provided to the Marketing Department by the SJVC Director of Program Compliance and the Carrington College Associate Vice President, Learning and Development. 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, 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), 1080 Marina Village Parkway, Suite 500, Alameda, CA 94501, (510) 748-9001.

WSCUC.org

The WSCUC is an institutional accrediting body recognized by the Council for Higher Education Accreditation and the U.S. Department of Education.

Carrington College is accredited by the Accrediting Commission for Community and Junior Colleges (ACCJC), 428 J Street, Suite 400, 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 <http://www.accjc.org/>.

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

Prohibited Accreditation Statement Examples:
"Accredited Degrees"
"Degrees or programs are accredited by ACCJC"
"Fully Accredited" or "full accreditation" – these statements must not be used since partial institutional accreditation is not possible.
"Nationally Accredited" or "Regionally Accredited"- this terminology is no longer utilized.

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 web pages, and in the Colleges' Catalog and College brochures.

Programmatic accreditation and/or approval updates are provided to the Marketing Department by the Compliance and Regulatory Affairs 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 the (SCI) statement which includes a link to the (SCI) webpage on the institutional website. See the STUDENT CONSUMER INFORMATION SECTION for detailed information.

All traditional advertisements, whether created by the Ember Ed Marketing Department or a contractor, are reviewed and approved by the Compliance and Regulatory Affairs 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 student 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 and Regulatory Affairs 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 the (SCI) statement

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 and Regulatory Affairs 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, (SCI) statement, 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 and Regulatory Affairs 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.

2. Phone Books/Directories

All print advertising for The Colleges in phone directories includes the campus phone number and address. The (SCI) statement is also included.

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 (student learning outcomes from the academic catalog), the program credentials available, career information, admissions requirements, the standard course listing, and if the program prepares graduates for a credentialing exam.

These brochures are updated as program and campus details change over time. All low-priority updates (not related to compliance) are made to print materials prior to shipping the next supply order. 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 may also list the College's institutional accreditation statement, state approval, (SCI) statement, and programmatic accreditation or approvals where applicable.

INTERACTIVE ADVERTISING

Ember Ed 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 Ed 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, (SCI) statement, 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 and Regulatory Affairs 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 at the student consumer information disclosure with 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. See Disclaimer Text section for prescribed language.

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 programs 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 review and submit the email creative (subject line and content) to Compliance and Regulatory Affairs Department for approval. Once approved, the Marketing Department will schedule email delivery to prospective students.

Every email campaign the Colleges send must include the (SCI) statement, and 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 Verity to send SMS messages.

Text message language should be submitted to the Compliance and Regulatory Affairs Department for review prior to initial distribution.

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 must 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. See Disclaimer Text section for prescribed language.

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 the colleges 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 and Regulatory Affairs Department.

All of The Colleges' landing pages contain links to accreditation and approval information, Student Consumer Information, and privacy policies. Any form where a prospective student would enter their telephone number must include the mandatory TCPA language.

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 and Regulatory Affairs Department proactively monitor, review and respond to consumer questions and complaints.

The Marketing Department reposts (Facebook, Instagram, LinkedIn, Pinterest, etc.) and re-tweets (Twitter/X) 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 and Regulatory Affairs 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 Ed'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 and Regulatory Affairs 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 and Regulatory Affairs 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 and Regulatory Affairs 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 by the Compliance and Regulatory Affairs Department.

Twice a year, in January and July, the Compliance and Regulatory Affairs Department 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. See Disclaimer Text section for prescribed language.

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 will 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 and Regulatory Affairs Department 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 a 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 and Regulatory Affairs Department.

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 [on InfoZone](#).

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.

Registered marks need to be included when referring to Apple ® and iPad ®, and the following disclosure must be present: Apple and iPad are trademarks of Apple Inc., registered in the U.S. and other countries and regions.

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 across both brands use the title **Enrollment Services Associate**.

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 several jurisdictions in which Ember Ed 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 and Regulatory Affairs Department 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 Disclosures

Alaska

San Joaquin Valley College does not have a physical presence in Alaska. The programs offered through distance education are exempt from authorization by the Alaska Commission on Postsecondary Education under AS 14.48.

Arizona

If the student complaint cannot be resolved after exhausting the Institution's grievance procedure, the student may file a complaint with the Arizona State Board for Private Postsecondary Education. The student must contact the State Board for further details. The State Board address is:

1740 W. Adams Street, #3008 Phoenix, AZ 85007

Phone: 602/542-5709

Website: www.ppse.az.gov

California

SJVC 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 SJVC 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.

Any questions a student may have regarding this catalog that have not been satisfactorily answered by the institution may be directed to the Bureau for Private Postsecondary Education at:

1747 N. Market Blvd. Ste. 225 Sacramento, CA 95834 or

P.O. Box 980818, West Sacramento, CA 95798-0818

bppe.ca.gov

Telephone: (888) 370-7589 and (916) 574-8900

Fax: (916) 263-1897

COMPLAINTS

A student or any member of the public may file a complaint about this institution with the Bureau for Private Postsecondary Education by calling (888) 370-7589 or by completing a complaint form, which can be obtained on the Bureau's internet website (bppe.ca.gov).

It is highly recommended but not mandatory, to bring all complaints first to the attention of the Institution. In most cases this will resolve the complaint faster and will result in a satisfactory outcome. We suggest that students use this internal process first, but that is not required and they may contact the Bureau at any time.

Iowa

SJVC is registered with the Iowa College Student Aid Commission (Iowa College Aid) for its programs offered through the Online Division. Pursuant to Iowa Code Section 261.9(1) "g" Iowa's military deployment tuition and fee refund policy for students is as follows:

A policy to offer not less than the following options to a student who is a member, or the spouse of a member if the member has a dependent child, of the Iowa national guard or reserve forces of the United States and who is ordered to state military service or federal service or duty:

- i. Withdraw from the student's entire registration and receive a full refund of tuition and mandatory fees.
- ii. Make arrangements with the faculty member for the student's course grades, or for incompletes that shall be completed by the student at a later date. If such arrangements are made, the student's registration shall remain intact and tuition and mandatory fees shall be assessed for the courses in full.
- iii. Make arrangements with only some of the faculty teaching courses in which the student was enrolled for grades, or for incompletes that shall be completed by the student at a later date. If such arrangements are made, the registration for those courses shall remain intact and tuition and mandatory fees shall be assessed for those courses. Any course for which arrangements cannot be made for grades or incompletes shall be considered dropped and the tuition and mandatory fees for the course refunded.

IOWA STUDENT COMPLAINTS

Students residing in Iowa who have questions or complaints about this institution may contact the Iowa Department of Education – Bureau of Iowa College Aid at 400 E. 14th Street, Des Moines, IA 50319, toll-free telephone number (877) 272- 4456.

<https://educate.iowa.gov/higher-ed/student-complaint>

Texas

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

Washington

For Washington state residents seeking information and resources about student loan repayment or seeking to submit a complaint relating to your student loans or student loan servicer, please visit www.wsac.wa.gov/loan-advocacy or contact the Student Loan Advocate at loanadvocate@wsac.wa.gov.

San Joaquin Valley College is authorized by the Washington Student Achievement Council 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 placement components for specific degree programs. The Council may be contacted for a list of currently authorized programs. Authorization by the Council does not carry with it an endorsement by the Council 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 Council at P.O. Box 43430, Olympia, WA 98504-3430 or by email at degreeauthorization@wsac.wa.gov.

The transferability of credits earned at San Joaquin Valley College is at the discretion of the receiving college, university, or other educational institution. Students considering transferring to any institution should not assume that credits earned in any program of study at San Joaquin Valley College will be accepted by the receiving institution. Similarly, the ability of a degree, certificate, diploma, or other academic credential earned at San Joaquin Valley College to satisfy an admission requirement of another institution is at the discretion of the receiving institution. Accreditation does not guarantee credentials or credits earned at San Joaquin Valley College will be accepted by or transferred to another institution. To minimize the risk of having to repeat coursework, students should contact the receiving institution in advance for evaluation and determination of transferability of credits and/or acceptability of degrees, diplomas, or certificates earned.

Washington Student Complaints

The Washington Student Achievement Council (WSAC) has authority to investigate student complaints against specific schools. WSAC may not be able to investigate every student complaint. Visit <https://www.wsac.wa.gov/student-complaints> for information regarding the WSAC complaint process.

B. Programmatic Accreditation and Approvals

The most up to date program specific accreditation and approval statements are available in the college's academic catalogs. These catalogs can be found at:

- Carrington College - [Academic Catalog | Carrington College](#)
- San Joaquin Valley College - [SJVC Catalog | Program Listings, Course Descriptions, and More](#)

C. Carrington College State Disclosures

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: <http://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: <http://ppse.az.gov/>.

ALASKA

Carrington College online is exempt from Alaska Commission on Postsecondary Education authorization requirements under Alaska Statutes 14.48 and this chapter, because the programs offered to Alaska residents are online and the institution does not have a physical presence in the state.

CALIFORNIA

This institution is a private institution approved to operate by the California Bureau for Private Postsecondary Education. Approval to operate means the institution is compliant with the minimum standards contained in the California Private Postsecondary Education Act of 2009 (as amended) and Division 7.5 of Title 5 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.

Any questions a student may have regarding this catalog that have not been satisfactorily answered by the institution may be directed to the Bureau for Private Postsecondary Education at 1747 North Market Blvd., Suite 225 Sacramento, CA 95834, <http://www.bppe.ca.gov/>, 888 370 7589 and 916 574 8900 or by fax 916 263 1897.

Pursuant to BPPE regulations, Carrington College is required to disclose the following:

the College does not have a pending petition in bankruptcy.

is not operating as a debtor in possession.

has not filed a petition within the preceding five years.

has not had a petition in bankruptcy filed against it within the preceding five years that resulted in reorganization under Chapter 11 of the United States Bankruptcy Code (11 U.S.C. Sec 1101 et seq.).

DISTANCE EDUCATION

Carrington College Online is approved or exempt from supervision to enroll residents of the following states: AK, AZ, AR, CA, CO, GA, HI, IA, ID, IL, MS, MO, MT, ND, NV, NM, OR, SC, SD, TN, TX, UT, VT, WA, and WY. Program availability varies by state. Program availability varies by state.

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://gnpec.georgia.gov/student-resources/complaints-against-institution>

IDAHO

The Boise campus is registered with the Idaho State Board of Education under Idaho Statutes Title 33, Chapter 24 Board office: Physical location is 650 West State Street, Third Floor, Boise, ID 83720. Mailing address is PO Box 83720, Boise, ID 83720-0037, 208 334 2270, boardofed.idaho.gov.

Students that have exhausted their school's institutional grievance or complaint process may file a student complaint form with the Idaho State Board of Education at

<https://boardofed.idaho.gov/resources/complaint-form-for-proprietary-and-private-postsecondary-schools/>. Veterans Affairs Benefit Recipients may also submit feedback to the VA via the [GI Bill® School Feedback Tool | Veterans Affairs \(va.gov\)](#) and contact the Idaho State Approving Agency via email at education@veterans.idaho.gov or mail letter of complaint to 351 Collins Road, Boise, Idaho, 83702.

GI Bill® is a registered trademark of the U.S. Department of Veterans Affairs (VA).

IOWA

Carrington College is registered with the Iowa Department of Education – Iowa College Aid and authorized to offer degree granting, distance education programs in the state of Iowa.

Iowa College Aid has created a Student Complaint Form to accept a student's questions, concerns, or complaint related to a postsecondary school.

A student may also contact Iowa College Aid toll-free at 877 272 4456. Iowa Department of Education – Bureau of Iowa College Aid (Iowa College Aid) student complaint website <https://educate.iowa.gov/higher-ed/student-complaints>.

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 2800 E. St. Louis Avenue, Las Vegas, Nevada 89104 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.

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 Oregon Higher Education Coordinating Commission, 3225 25th Street SE, Salem, OR 97302; Phone 503 947 5716 or email Info.PPS@state.or.us.

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.

Accrediting Commission for Community and Junior Colleges
428 J Street, Suite 400
Sacramento, CA 95814

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, Physical location is 128 10th Avenue SW, 6th Floor, Olympia, WA 98501. Mailing address is PO Box 43105, Olympia, WA 98504, 360 709 4600, wtb.wa.gov, email: workforce@wtb.wa.gov.

Carrington College does not discriminate against students or potential students on the basis of race, creed, color, national origin, sex, veteran or military status, sexual orientation or the presence of any sensory, mental or physical disability or the use of a trained guide dog or service animal by a person with a disability.

The Carrington College Spokane campus is authorized by the Washington Student Achievement Council 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 Carrington College to offer specific degree programs. The Council may be contacted for a list of currently authorized programs. Authorization by the Council does not carry with it an endorsement by the Council 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 Council at P.O. Box 43430, Olympia, WA 98504-3430 or by email at degreeauthorization@wsace.wa.gov.

The transferability of credits earned at the Carrington College Spokane campus is at the discretion of the receiving college, university, or other educational institution. Students considering transferring to any institution should not assume that credits earned in any program of study at the Carrington College Spokane campus will be accepted by the receiving institution. Similarly, the ability of a degree, certificate, diploma, or other academic credential earned at the Carrington College Spokane campus to satisfy an admission requirement of another institution is at the discretion of the receiving institution. Accreditation does not guarantee credentials or credits earned at the Carrington College Spokane campus will be accepted by or transferred to another institution.

To minimize the risk of having to repeat coursework, students should contact the receiving institution in advance for evaluation and determination of transferability of credits and/or acceptability of degrees, diplomas, or certificates earned.

The Carrington College Sacramento campus is authorized by the Washington Student Achievement Council 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 the Carrington College Sacramento campus to advertise/recruit and offer field placement components for specific degree programs. The Council may be contacted for a list of

currently authorized programs. Authorization by the Council does not carry with it an endorsement by the Council 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 Council at P.O. Box 43430, Olympia, WA 98504-3430 or by email at degreeauthorization@wsac.wa.gov.

The transferability of credits earned at Carrington College Sacramento is at the discretion of the receiving college, university, or other educational institution. Students considering transferring to any institution should not assume that credits earned in any program of study at the Carrington College Sacramento campus will be accepted by the receiving institution. Similarly, the ability of a degree, certificate, diploma, or other academic credential earned at the Carrington College Sacramento campus to satisfy an admission requirement of another institution is at the discretion of the receiving institution. Accreditation does not guarantee credentials or credits earned at the Carrington College Sacramento campus will be accepted by or transferred to another institution.

To minimize the risk of having to repeat coursework, students should contact the receiving institution in advance for evaluation and determination of transferability of credits and/or acceptability of degrees, diplomas, or certificates earned.

Veterans Benefits Approval Statements

Selected programs of study at the Carrington College Spokane campus are approved by the Workforce Training and Education Coordinating Board's State Approving Agency (WTECB/SAA) for enrollment of those eligible to receive benefits under Title 38 and Title 10, USC. Points of contact for students using

Veterans Education benefits at the Carrington College Spokane campus:

Alissa Shaub
Senior Director Financial Services
Alissa.Shaub@carrington.edu
628 239 121

Carrington College does not and will not provide any commission, bonus or other incentive payment based directly or indirectly on success in securing enrollment or financial aid to any persons or entities engaged in any student recruiting or admissions activities or in making decisions regarding the award of student financial assistance.

Carrington College displays all approval and accreditation documents at each campus.

The most current information on accreditation and approvals can be found at <https://carrington.edu/accreditation-and-approvals/>.

D. Facebook Terms of Use

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