



Policy on Misrepresentation

This statement addresses the U.S. Department Regulatory Citation: 34 CFR § 668.71 through 668.75.

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

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

Definitions: The current regulations define "misleading statement," "misrepresentation" and "substantial misrepresentation."

- Misleading statement is defined as including any statement that has the likelihood or tendency to deceive or confuse. A statement is any communication made in writing, visually, orally, or through other means.
- Misrepresentation is defined as "any false, erroneous or misleading statement made by an institution, one of its representatives, or any ineligible institution, organization, or person with whom the eligible institution has an agreement to provide educational programs, or to provide marketing, advertising, recruiting, or admissions services, makes directly or indirectly to a student, prospective student, family of either, accrediting agency, state agency, any member of the public, or US Department of Education." This includes "dissemination of a student endorsement or testimonial made under duress or because the school required the student to provide the endorsement to participate in a program."
- Substantial Misrepresentation is defined as "any misrepresentation on which the person to whom it was made could reasonably be expected to rely, or has reasonably relied, to that person's detriment."

The revised definition of misrepresentation, misleading statement, and substantial misrepresentation applies to not just written statements, but to "any communication made in writing, visually, orally, or through other means."

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

Responsibilities toward Misrepresentation to Students and Others: The President/CEO and Dean of Academic Affairs are responsible for providing accurate and timely information for faculty and staff at key junctures during the academic year. PRSNA also conducts training sessions on general school information which is open to all faculty and staff several times a year. A portion of each training session will include the PRSNA's expectations with regard to use of statements that tend to mislead or misrepresent the academic programs or related admissions and financial aid procedures according to U.S. Department of Education statutes.

In addition, departments with proven "high contact" with students and the community like the Financial Aid office, the Office of Admissions and Recruitment provide training opportunities on more focused subject matters to provide clarity on new policy, procedures and regulations.

This statement as it applies to oral statements shall be provided to the faculty and staff on an annual basis particularly for admissions staff and student ambassadors who may represent the institution with presentations in high schools and to faculty prior to college preview events.

Maintenance of Records: Records shall be maintained as follows:

- The Dean of Academic Affairs maintains electronic copies of all documents submitted for proofing.
- The Administrator maintains records of news releases which include quotes and statements made by college personnel.
- The Director of Admissions is responsible for the training of personnel regarding misrepresentation of admissions requirements and other institutional information.
- The director of Financial Aid is responsible for the training of personnel regarding misrepresentation of the financial aid information.

Disciplinary Action

Any employee's conduct resulting in disciplinary actions from misrepresentation activity will be documented in the Board of Directors and maintained in the employee's personnel file.