

Misrepresentation Policy

Brown Aveda Institute makes every effort not to misrepresent itself to students, staff, oversight agencies and the public at large. All staff is responsible for portraying the institute in a manner that is honest and truthful, particularly staff involved in the recruitment of students. Publications and advertising must be factual and truthful in nature.

Information, regardless of how it is presented (verbally, written, visually, website, etc.), is intended to be truthful and complete.

Misrepresentation

- is defined as a false, incorrect, or misleading statement to any individual or agency.
- includes any statement that omits information in such a way as to make the statement false, erroneous, or misleading.
- is any *misleading statement* that has the likelihood or tendency to deceive.

A statement is any communication made in writing, visually, orally, or through other means.

This definition applies to statements made by an eligible school, 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.

Misrepresentation includes the dissemination of a student endorsement or testimonial that a student gives either under duress or because the school required the student to make such an endorsement or testimonial to participate in a program. Brown Aveda Institute does not require student endorsement or testimonials as a condition for enrolling.

A school, one of its representatives, or a related party (see above) engages in *substantial misrepresentation* when it does so about the nature of its educational program, its financial charges, or the employability of its graduates. Substantial misrepresentation is defined as any misrepresentation on which the person to whom it was made could reasonably be expected to rely, or has reasonably relied, to that person's detriment. Substantial misrepresentations are prohibited in all forms, including those made in any advertising or promotional materials or in the marketing or sale of courses or programs of instruction offered by the institution.

Oversight Agencies

Approvals by the state, NACCAS, the school's accrediting agency, and the U.S. Department of Education are to be used to inform the student and public that Brown Aveda Institute has met basic eligibility requirements for approval or participation in

Federal Student Aid Programs. Brown Aveda Institute will not state or suggest that any of its programs are endorsed by the state, NACCAS, its accrediting agency, or the U. S. Department of Education.

Nature of educational program

Brown Aveda Institute strives to comply with FSA administration requirements to avoid misrepresentation of the nature of its educational programs which includes but is not limited to false, erroneous, or misleading statements concerning—

- (1) The types, sources, nature and extent of institutional, programmatic, or specialized accreditation;
- (2) Transferability of course credits earned at Brown Aveda Institute to any other institution;
- (3) Conditions under which Brown Aveda Institute will accept transfer credits;
- (4) Whether successful completion of a program qualifies a student—
 - For acceptance to a labor union or similar organization; or
 - To receive, to apply to take, or to take the examination required to receive, a local, state, or federal license, or a nongovernmental certification required as a precondition for employment, or to perform certain functions in the states in which the educational program is offered, or to meet additional conditions that the institution knows or reasonably should know are generally needed to secure employment in a recognized occupation for which the program prepares;
- (5) The requirements for successfully completing the course of study or program;
- (6) Circumstances that would constitute grounds for terminating the student's enrollment;
- (7) Whether its courses are recommended or have been the subject of unsolicited testimonials or endorsements by—
 - Vocational counselors, high schools, colleges, educational organizations, employment agencies, members of a particular industry, students, former students, or others; or
 - Governmental officials for governmental employment;
- (8) Its size, location, facilities, or equipment;
- (9) The availability, frequency, and appropriateness of its courses and programs to the employment objectives that it states its programs are designed to meet;
- (10) The nature, age, and availability of its training devices or equipment for their appropriateness to the employment objectives that it states its programs and courses are designed to meet;
- (11) The number, availability, and qualifications, including the training and experience, of its faculty and other personnel;
- (12) The availability of part-time employment or other forms of financial assistance;
- (13) The nature and availability of any tutorial or specialized instruction, guidance and counseling, or other supplementary assistance it will provide its students before, during or after the completion of a course;
- (14) The nature or extent of any prerequisites established for enrollment in any course;

- (15) The subject matter, content of the course of study, or any other fact related to the degree, diploma, certificate of completion, or any similar document that the student is to be, or is, awarded upon completion of the course of study;
- (16) Whether the academic, professional, or occupational degree that the institution will confer upon completion of the course of study has been authorized by the appropriate state educational agency. This type of misrepresentation includes, in the case of a degree that has not been authorized by the appropriate

Nature of financial charges

Brown Aveda Institute strives to comply with FSA administration requirements to avoid misrepresentation concerning the nature of its financial charges, including but is not limited to false, erroneous, or misleading statements concerning—

- (1) Offers of scholarships to pay all or part of a course charge;
- (2) Whether a particular charge is the customary charge at the institution;
- (3) The cost of the program and the institution's refund policy if the student does not complete the program;
- (4) The availability or nature of any financial assistance offered to students, including a student's responsibility to repay any loans, regardless of whether the student is successful completes the program or finds employment in the field; or
- (5) The student's right to reject any particular type of financial aid or other assistance, or whether the student must apply for a particular type of financial aid, such as institutional financing

Employability of graduates

Brown Aveda Institute strives to comply with FSA administration requirements to avoid misrepresentation regarding the employability of its graduates includes but is not limited to false, erroneous, or misleading statements concerning—

- (1) Its relationship with any organization, employment agency, or other agency providing authorized training leading directly to employment;
- (2) Its plans to maintain a placement service for graduates or otherwise assist its graduates to obtain employment;
- (3) Its knowledge about the current or likely future conditions, compensation, or employment opportunities in the industry or occupation for which the students are being prepared;
- (4) Whether employment is being offered by the school or that a talent hunt or contest is being conducted, including but not limited to the use of phrases such as "Men/women wanted to train for * * *," "Help Wanted," "Employment," or "Business Opportunities";
- (5) Government job market statistics in relation to the potential placement of its graduates; or
- (6) Other requirements that are generally needed to be employed in the fields for which the training is provided, such as requirements related to commercial driving licenses or permits to carry firearms, and failing to disclose factors that would prevent an applicant from qualifying for such requirements, such as prior criminal records or preexisting medical conditions.