EXT-013

Misrepresentation of the University's Academic Programs and Financial Charges

Effective Date Monday, June 17, 2019

Status Final

Last Revised Wednesday, September 10, 2025

Policy Type University

Contact Office University Registrar (UREG)

Oversight Executive
President of the University

Applies To Academic Division.

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Reason for Policy

The University has established a policy to assist in complying with program integrity requirements as outlined by the Department of Defense (DoD) Voluntary Education Partnership Memorandum of Understanding (MOU). The DoD MOU states that all participating educational institutions must "have policies in place compliant with program integrity requirements consistent with the regulations issued by ED (34 C.F.R. 668.71-668.75 and 668.14) related to restrictions on misrepresentation, recruitment, and payment of incentive compensation."

Definition of Terms

Misrepresentation

Description

Any false, erroneous, or misleading statement made directly or indirectly, in writing, visually, orally, or through other means, including any statement that has the likelihood or tendency to deceive.

Substantial Misrepresentation

Description

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 concerning the nature of an institution's educational programs, financial charges, or the employability of its graduates.

Policy Statement

The University of Virginia has committed to complying with the tenets of its Voluntary Education Partnership Memorandum of Understanding (MOU) with the U.S. Department of Defense (DoD) in the delivery of its educational programs.

No unit of the University is allowed to engage in Substantial Misrepresentation.

1. **Types of Substantial Misrepresentation:**
   A. **Nature of Educational Program:**
      - The institution's accreditation;
      - Advisement on the transferability of credit out of the University;
      - Transferability of credits from another institution to the University;
      - Whether successful completion of a course of instruction qualifies a student:
        - For acceptance to a labor union or similar organization; or
        - To receive licensure or a certification required as a precondition for employment;
      - The requirements for successfully completing a degree program;
      - The circumstances that would constitute grounds for terminating the student's enrollment;
      - Whether the University's 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 by government officials for government employment;
      - The institution's size, location, facilities, and equipment;
      - The availability and frequency of courses and programs;
      - The nature, age, and availability of training devices or equipment;
      - The number and qualifications of the faculty and other personnel;
      - The availability of student wage employment or other forms of financial assistance;
      - The nature and availability of any tutorial or specialized instruction, guidance and counseling, and academic advising; or
      - Whether the degrees offered by the institution have been authorized by the appropriate state educational agency.
   B. **Nature of Financial Charges:**
      - Offers of scholarships;
      - Whether a particular charge is the mandatory charge at the institution for a course;
      - The cost of a program and the institution's refund policy;
      - The availability or nature of any financial assistance offered to students, including a student's responsibility to repay any loans; or
      - 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.
   C. **Employability of Graduates:**
      - The institution's relationship with any organization, employment agency, or other agency providing authorized training leading directly to employment;
      - The institution's job placement services;
      - The institution's knowledge of current and likely future employment opportunities;
      - Whether employment is being offered by the institution;
      - Government job market statistics in relation to the potential placement of its graduates; or
      - Other requirements that are generally needed to be employed in the fields for which specific training is provided.

2. **Compliance with Policy:**
   Failure of the University to demonstrate a willingness to resolve findings may result in penalties from a written warning to revocation of the DoD Voluntary Education Partnership MOU and removal from participation in the DoD TA Program. In addition, failure to comply with the requirements of this policy may result in disciplinary action up to and including termination or expulsion in accordance with relevant University policies.

   Direct questions about this policy to the Office of the Registrar.

Related Information

EXT-014: Use of U.S. Department of Defense Seals or Military Insignias for Educational Programs
Voluntary Education Partnership Memorandum of Understanding (MOU) dated 3/15/11, effective 7/7/14.

Major Category External Relations

Next Scheduled Review Sunday, September 10, 2028

Revision History
Confirmed 9/10/25.

Approved By Executive Vice President and Chief Operating Officer

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