



2020 - 2021 Department of Defense Corrective Action Plan

In Response to Recent Education Institutional
Compliance Program Review

January 2021

Prepared by Laura Biechler
Director of Financial Aid

Summary

Finding Number	Consolidated Findings
Recruiting, Marketing, & Advertising	
Finding # 1 of 6	The institution's website contains unauthorized DoD or Military insignias, logos and/or uniforms (including rank and/or Service), which could be inferred as a DoD endorsement of the institution.
Finding # 2 of 6	Evidence provided does not clearly articulate policies consistent with the ban against providing commission, bonus or other incentive payment based directly or indirectly on securing Service member enrollments.
Finding # 3 of 6	Evidence provided does not clearly articulate policies consistent with the ban against high-pressure recruitment tactics.
Finding # 4 of 6	Evidence provided does not clearly articulate that prospective students are directed to receive approval from the student's ESO, military counselor or Service prior to enrollment.
Financial Matters	
Finding # 5 of 6	Evidence provided does not clearly articulate the training or qualifications of the required financial aid advisor position.
Finding # 6 of 6	The tuition listed on the institution's website does not match the tuition information listed on DoDMOU.com.
Accreditation and Credentialing Requirements	
No Findings for Accreditation and Credentialing Requirements.	
Academic Counseling and Post-Graduation Job Opportunities	
No Findings for Academic Counseling and Post-Graduation Job Opportunities.	

CORRECTIVE ACTION PLAN

Institutional Name: Bridgewater State University

OPEID: 00218300-00

Institution POC: Laura A Biechler

Email: lbiechler@bridgew.edu

Phone: 508-531-1405

**If remediation evidence
is available, include
hyperlink or attachment*

Finding Number	Finding	Corrective Action(s)	Target Completion Date*
1	The institution's website contains unauthorized DoD or Military insignias, logos and/or uniforms (including rank and/or Service), which could be inferred as a DoD endorsement of the institution.	Action to correct complete: BSU has removed all unauthorized DoD or Military insignias, logos and/or uniforms from its website. https://www.bridgew.edu/office/military-veteran-student-services AND https://www.bridgew.edu/office/financial-aid/military-benefits	January 29, 2021
2	Evidence provided does not clearly articulate policies consistent with the ban against providing commission, bonus or other incentive payment based directly or indirectly on securing Service member enrollments.	Please see attached update policy Title of Policy: Recruitment and Enrollment AND BSU also has made this public on our new landing page dedicated to Service Members to reference: https://www.bridgew.edu/office/financial-aid/military-benefits/admission-transfer-credits	January 29, 2021
3	Evidence provided does not clearly articulate policies consistent with the ban against high-pressure recruitment tactics.	Please see attached update policy Title of Policy: Role of Admissions AND BSU also has made this public on our new landing page dedicated to Service Members to reference: https://www.bridgew.edu/office/financial-aid/military-benefits/admission-transfer-credits	January 29, 2021
4	Evidence provided does not clearly articulate that prospective students are directed to receive approval from the student's ESO, military counselor or Service prior to enrollment.	Please see attached policy Title of Policy: Military Advisement	January 29, 2021
5	Evidence provided does not clearly articulate the training or qualifications of the required financial aid advisor position.	Please see the attached documents which clarifies the role and training of the Financial Aid Office: 2 Resumes, Job Description, and Certificates of Completion of Training	January 29, 2021

6	The tuition listed on the institution's website does not match the tuition information listed on DoDMOU.com.	Please see the remarks on the sixth finding below in this document. Link to this information online: https://www.bridgew.edu/office/financial-aid/military-benefits/department-of-defense	January 29, 2021
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Findings and Recommendations

Recruiting, Marketing, & Advertising

#1

Per DoDI 1322.25, *Voluntary Education Programs*, paragraph 1.c.(1)(b), “all educational institutions providing education programs through the DoD Tuition Assistance (TA) Program will not use unfair, deceptive, and abusive recruiting practices.”

Finding: The institution's website contains unauthorized DoD or Military insignias, logos and/or uniforms (including rank and/or Service), which could be inferred as a DoD endorsement of the institution.

Recommendation: Department of Defense and Military Seals are protected by law from unauthorized use, and these seals may not be used for non-official purposes. Each Military Service has a Trademark Licensing Program Office that manages its many trademarks, both graphics and word marks. These protected marks may not be used without prior written permission. Recommend you consult the appropriate Military Service Trademark Licensing Program Office for a written determination regarding your request to use Military-specific materials and take appropriate action to remediate this finding.

Institutional Response:

A complete review of the Bridgewater State University website has been completed. During this review, all unauthorized DoD or Military insignias, logos and/or uniforms have been removed to the best of our knowledge. Upon your review, please let the POC (Laura Biechler) know if this finding has been satisfied. Below are the two links that are tailored to our Military and VA students.

<https://www.bridgew.edu/office/financial-aid/military-benefits>

<https://www.bridgew.edu/office/military-veteran-student-services>

#2

Per DoD MOU, paragraph 3.j.(2), institutions are required to “Refrain from providing any commission, bonus, or other incentive payment based directly or indirectly on securing enrollments or federal financial aid (including Tuition Assistance funds) to any persons or entities engaged in any student recruiting, admission activities, or making decisions regarding the award of student financial assistance.”

Finding: Evidence provided does not clearly articulate policies consistent with the ban against providing commission, bonus or other incentive payment based directly or indirectly on securing Service member enrollments.

Recommendation: Institution must provide a clearly articulated policy banning the use of commissions, bonuses, or other incentive payment programs given to employees or contractors for the purpose of securing enrollments of Service members. Please provide a written policy, or a formal training guide or Standard Operating Procedure (SOP) that prevents this practice.

Institutional Response:

Institutional policy has been in place for all onboarding of staff and reviewed annually. Per DoD recommendation to this finding a revision has been applied to include this on the designated DoD landing page online so that it is easily accessible. <https://www.bridgew.edu/office/financial-aid/military-benefits>

Please also see attached policy titled, *Policy Recruitment and Enrollment*.

Please confirm that this satisfies Finding #2

#3

Per DoD MOU, paragraph 3.j.(3), institutions are required to "Refrain from high-pressure recruitment tactics such as making multiple unsolicited contacts (3 or more), including contacts by phone, email, or in-person, and engaging in same-day recruitment and registration for the purpose of securing Service member enrollments."

Finding: Evidence provided does not clearly articulate policies consistent with the ban against high-pressure recruitment tactics.

Recommendation: Institution must provide a clearly articulated policy banning high-pressure recruitment tactics for the purpose of securing enrollments of Service members. Please provide a written policy, or a formal training guide of Standard Operating Procedure (SOP) that prevents this practice.

Institutional Response:

Institutional policy has been in place for all onboarding of staff and reviewed annually. Per DoD recommendation to this finding a revision has been applied to include this on the designated DoD landing page online so that it is easily accessible. <https://www.bridgew.edu/office/financial-aid/military-benefits>

Please see attached policy titled, *Role of Admissions*.

Please confirm that this satisfies Finding #3

#4

Per DoD MOU, paragraph 4.d.(1), “If an eligible Service member decides to use Tuition Assistance (TA), educational institutions will enroll him or her only after the TA is approved by the individual’s Service.”

Finding: Evidence provided does not clearly articulate that prospective students are directed to receive approval from the student's ESO, military counselor or Service prior to enrollment.

Recommendation: Institutions should ensure policies are in place that direct eligible Service members receive approval from an Educational Services Officer (ESO) or counselor within the Military Service prior to enrolling. Please provide an institutional policy that instructs your personnel to direct service members to their ESO or Military Service. Additionally, links on your public-facing website to inform the students will support this requirement.

Institutional Response:

Per DoD recommendation BSU has an on boarding policy that is issued to all Admission and Financial Aid staff when onboarding to ensure that the ESO is contacted before any further action is taken by the school or student for enrollment. Please see attached policy titled, *Military Advisement*.

Please confirm that this satisfies Finding #4

#5

Per DoD MOU, paragraph 3.h.(1) and (4), “Before offering, recommending, arranging, signing-up, dispersing, or enrolling Service members for private student loans, provide Service members access to an institutional financial aid advisor who will make available appropriate loan counseling, including... Providing a clear and complete explanation of available financial aid, including Title IV of the Higher Education Act of 1965, as amended... [and] explaining that students have the ability to refuse all or borrow less than the maximum student loan amount allowed.”

Finding: Evidence provided does not clearly articulate the training or qualifications of the required financial aid advisor position.

Recommendation: The institution needs to provide evidence of the training and qualifications of any financial aid advisors who interact with Service members prior to offering, recommending, arranging, signing up, dispersing, or enrolling in Federal or private student loan programs.

Institutional Response:

Please see the attached documents titled:

Financial Aid Office – Finding #5

McNulty, Denise – Resume, Job Description, and Certifications

Biechler, Laura – Resume and Certifications

Please confirm that this satisfies Finding #5

#6

Per DoDI 1322.25, *Voluntary Education Programs*, paragraph 3.d.(1)(a), institutions will “Provide meaningful information to students on the financial cost of attendance at an educational institution so military students can make informed decisions on where to attend school,” [and]

DoD MOU, paragraph 3.n.(5) requires that institutions “Disclose basic information about the educational institution’s programs and costs, including tuition and other charges to the Service member. This information will be made readily accessible without requiring the Service member to disclose any personal or contact information.”

Finding: The tuition listed on the institution’s website does not match the tuition information listed on DoDMOU.com.

Recommendation: The institution should continually update its information on DoDMOU.com to help ensure it matches the tuition listed on the website.

Institutional Response:

Bridgewater State University Cost & Aid

We acknowledge that understanding the cost of attendance at a MA state institution can be challenging. Two years ago, Bridgewater State University dedicated much time and resources in moving the Cost & Aid categories to its own tab on bridgew.edu. We understand that Service members along with all students at BSU are looking for information that is clear and concise. To specifically address the DoD Finding #6, BSU has updated the DoD MOU in November 2020 and as well has now added an additional resource under the DoD compliance information page located at <https://www.bridgew.edu/office/financial-aid/military-benefits/department-of-defense>

The DoD information landing page also includes link to the Net Price Calculator, COA, and the Cohort Default Rates specific to BSU. In addition, the tuition fee breakdown by in-state and out of state are available to Service members online. For all Service member students, we have also included the document each student receives per semester after direct counseling with the school certifying official Denise McNulty. This provides a clear and personalized breakdown that helps students completely understand cost of attendance and any benefits or financial aid they receive. We will continue to work towards transparency, but we do hope that the steps already taken will satisfy this finding.

Please confirm that this satisfies Finding #6