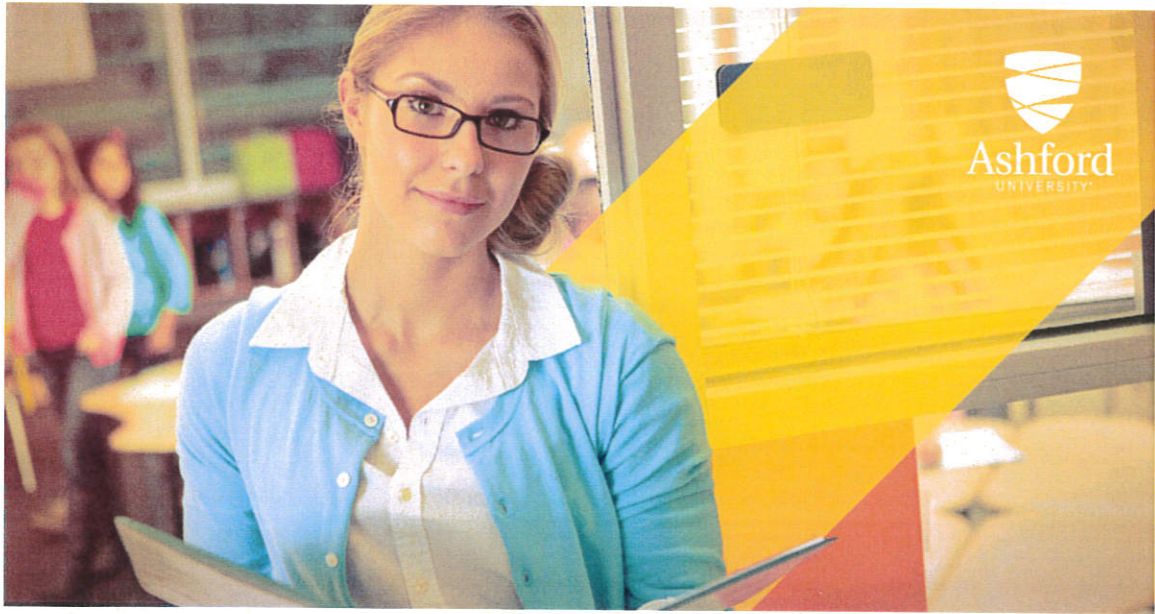


ASH0784







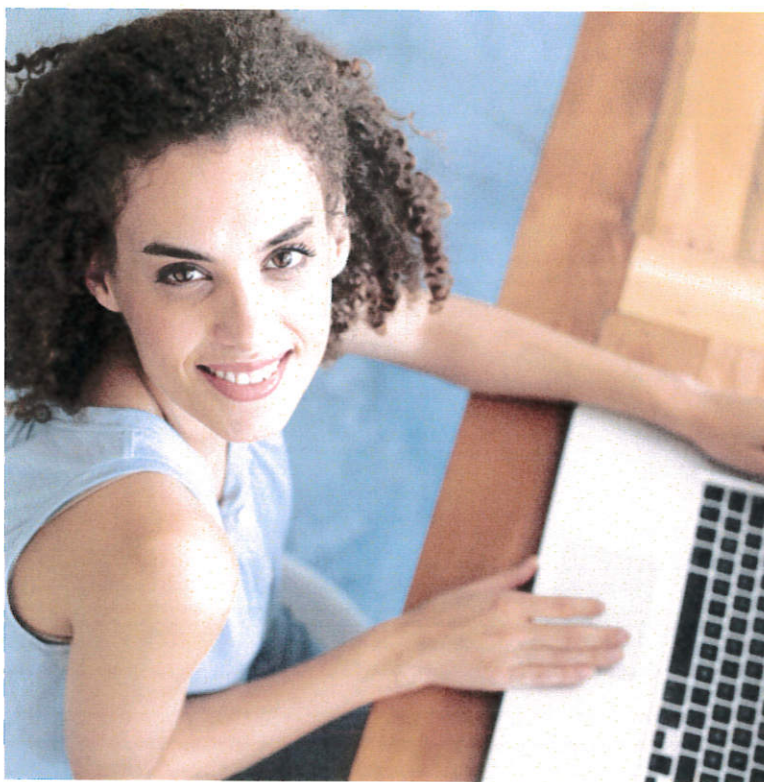


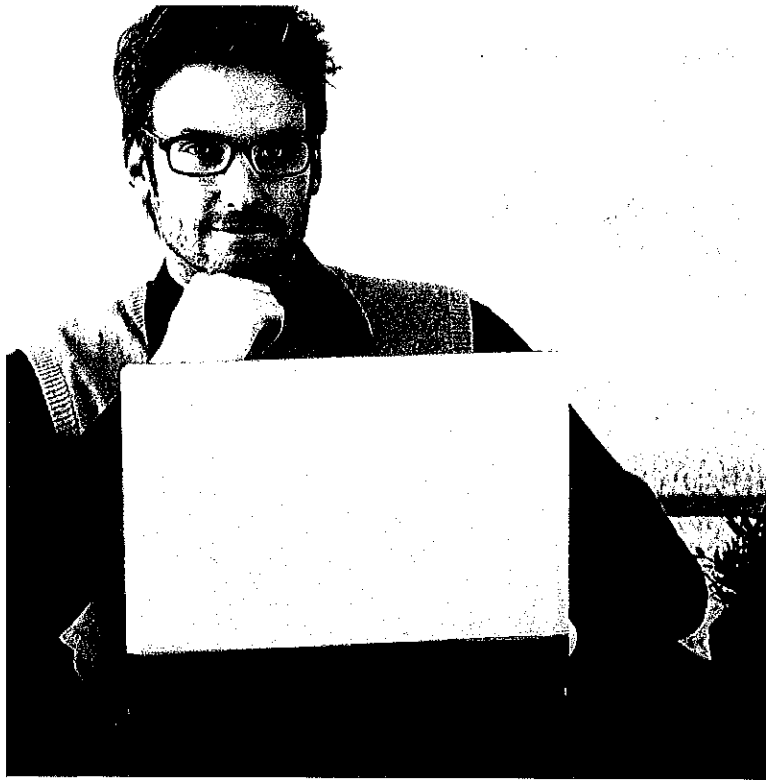












ASH0794









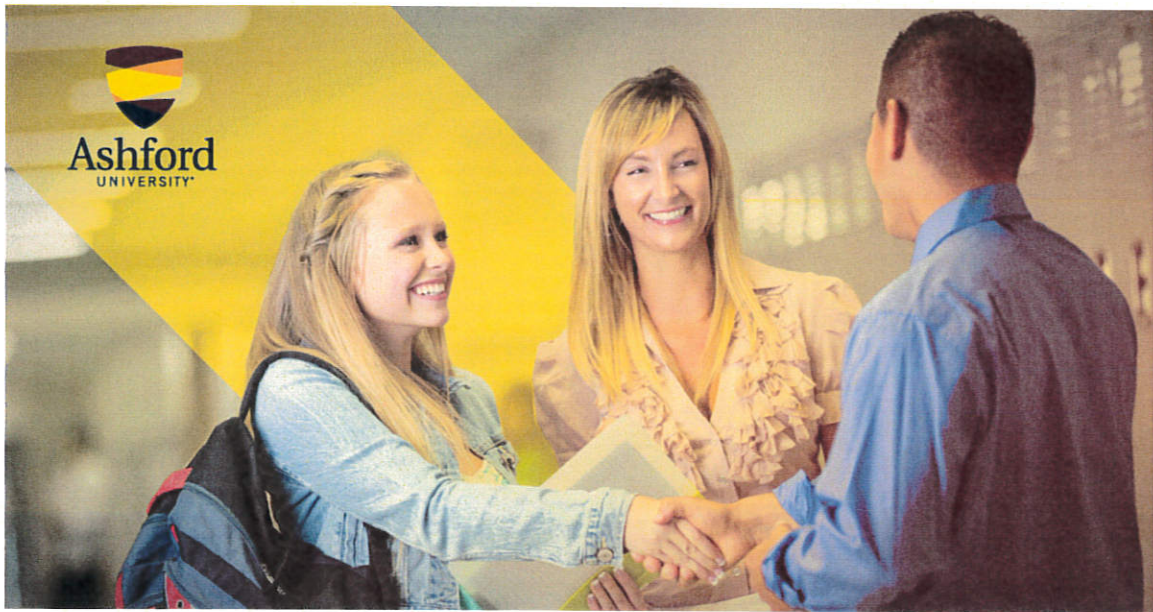










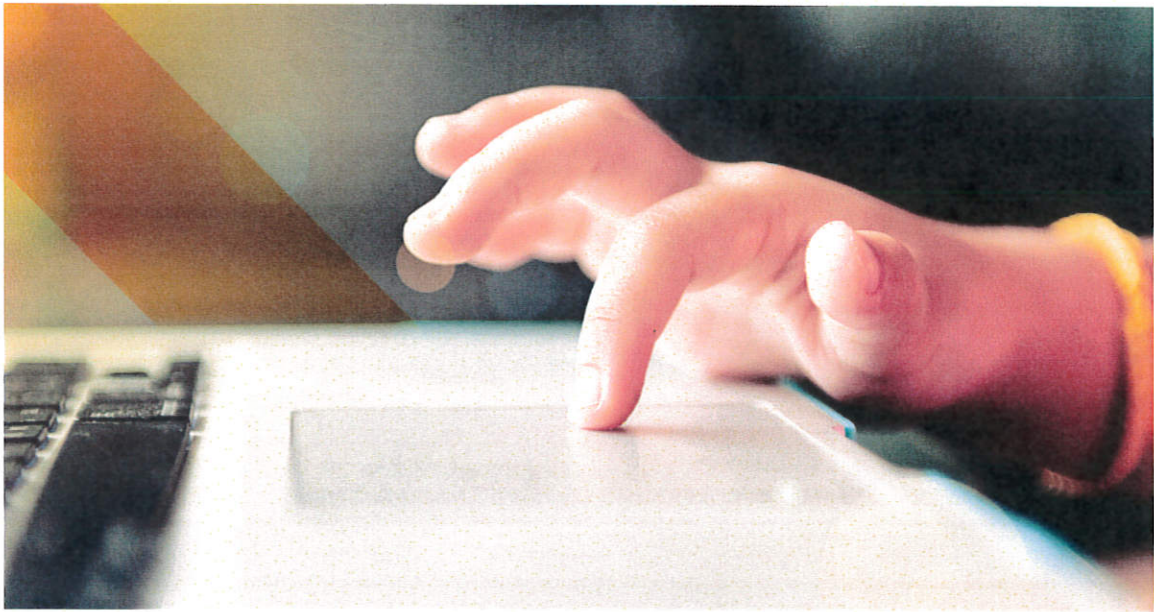








ASH0807







Advertising and Marketing Materials – Section 6

Ashford Social Media Channels

1. <https://www.facebook.com/ashforduniversity>
2. <https://twitter.com/AshfordU>
3. <https://plus.google.com/+ashforduniversity>
4. <https://www.youtube.com/user/AshfordUniversity>
5. <https://www.instagram.com/ashfordu/>
6. <https://www.pinterest.com/ashfordu/>
7. <https://www.facebook.com/AshfordMilitary/>

Ashford Web Properties

1. <http://www.ashford.edu>
 - A. <http://www.ashford.edu/military.htm>
 - B. http://www.ashford.edu/military/military_resources.htm
 - C. http://www.ashford.edu/military/about_ashford_military.htm
 - D. http://www.ashford.edu/military/paying_for_college.htm
(here I'd note that this statement is included at the bottom of the page: GI Bill® is a registered trademark of the U.S. Department of Veterans Affairs (VA). More information about education benefits offered by VA is available at the official U.S. government Web site at <http://www.benefits.va.gov/gibill>.)
 - E. <http://www.ashford.edu/military/transferring.htm>
 - F. http://www.ashford.edu/military/military_faq.htm
2. <http://m.ashford.edu>
 - A. <http://m.ashford.edu/military.php>
3. <http://degrees.ashford.edu>
 - A. <http://degrees.ashford.edu/military.htm>
4. <http://enroll.ashford.edu>
 - A. <http://enroll.ashford.edu/military.htm>
5. <http://forwardthinking.ashford.edu/>



**ONLINE
VENDOR COMPLIANCE GUIDE
VERSION 3**

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INTRODUCTION

Bridgepoint Education, Inc. ("BPI") is committed to improving the way individuals learn through innovative education solutions and to harnessing creativity and cutting edge technology to unlock the true power of the education system, while reimagining what the student experience should be. Bridgepoint's organizational culture consists of innovators and educators who are inspired to refine education's future by making it more practical, dynamic, and significant to all.

As the parent company of Ashford University ("AU" or "University"), BPI supports the University's mission which continues to change the face of education by equipping students with tools to help them change their lives. As a result, BPI's Marketing department is dedicated to providing AU's third-party inquiry aggregators ("vendors") with the following resource on the policies and procedures pertaining to their advertising and inquiry generation activities, which are conducted on behalf of the University.

ABOUT THIS GUIDE

This Guide provides assistance to vendors in complying with AU policies, which are put in place to ensure compliance with higher education regulations promulgated by the United States Department of Education as well as other regulatory bodies. The concepts presented in this Guide are by no means an exhaustive list, and they do not alter or suspend the terms of the MSA or Insertion Order.

This Guide is provided to vendors in addition to, and should be read in conjunction with, the Content Brand Standards, which is the universal ad copy created by Marketing, on behalf of AU. This approved ad copy is to be used in vendor marketing and advertising activities. From time to time, this Guide will be updated and the vendor is responsible for ensuring its affiliates, if any, receive this document within 24 hours of any new publication, as instructed by Marketing.

The **Online Vendor Compliance Guide** and the **Content Brand Standards** are distributed via Bridgepoint Education's Marketing Compliance department. For the current version of these documents, please contact Marketing Compliance.

Overall, Vendors and their permitted affiliates who provide prospective student inquiries to AU must ensure their advertisements and promotional activities are conducted in compliance with this Guide.

VENDOR CORE STANDARDS

- Provide the highest level of accuracy regarding the advertising of the Ashford University brand and program offerings
- Assume responsibility for all remediation requests to advertising regarding Ashford University
- Respond immediately to all compliance-related remediation requests
- Ensure full compliance by all permitted affiliates
- Comply with all federal and state laws and regulations covering advertising, marketing, and the Internet
- Comply with the terms of the Master Services Agreement (MSA) and IOs
- Adhere to all compliance provisions addressed herein

There are myriad federal and state restrictions on marketing activities and vendors, and third-party aggregators are required to adhere to all laws pertaining to advertising, marketing, telemarketing, and the Internet as well as comply with the terms of the Master Services Agreements and Insertion Orders ("IOs") entered into between BPI and pertaining to AU. It is of the utmost importance that all vendors and their affiliates comply with all laws pertaining to advertising, marketing, telemarketing and the Internet. All of the obligations set forth herein apply to vendors and to permitted affiliates or subcontractors; it is the obligation of the vendor to ensure compliance by its affiliates or subcontractors. Failure to comply with such laws is grounds for termination as a vendor; and vendors are responsible for the conduct of permitted affiliates.

Such policies and regulations include the **Federal Trade Commission Act (FTC)**, Section 5, which prohibits "unfair methods of competition" and "deceptive acts or practices."ⁱ According to the FTC, an advertisement is unfair if it causes or is likely to cause substantial injury to consumers, cannot be reasonably avoided by consumers, and is not outweighed by countervailing benefits to consumers or to competition.ⁱⁱ An advertisement is deceptive where representation, omission, or practice misleads or is likely to mislead the consumer; a consumer's interpretation of the representation, omission, or practice is considered reasonable under the circumstances, and the misleading representation omission or practice is material.ⁱⁱⁱ Overall, the FTC has broad authority to address deceptive advertising.

Paramount to vendor compliance is the adherence to the FTC Act as well as the Telephone Consumer Protection Act (TCPA), enforced by the **Federal Communications Commission**. Other regulation and oversight includes the **Consumer Financial Protection Bureau**, the U.S. Federal **CAN-SPAM Act**, and the U.S. Department of Education's **Program Integrity Rules**, specifically the **Misrepresentation Rule**.

The Misrepresentation Rule

On July 1, 2011, the Department of Education's Misrepresentation Rule went into effect, which placed an increased focus on marketing and advertising activities in the higher education sector.

Misrepresentation, according to the rule, is defined as any false, erroneous or misleading statement made by the institution, one of its representatives, or any ineligible institution, organization, or person with whom the eligible institution has an agreement to provide...marketing, advertising, and recruiting or admissions services to.^{iv} And "...A statement is any communication made in writing, visually, orally, or through other means."^v

The Rule further states that institutions cannot engage in substantial misrepresentation regarding the nature of their educational programs, their financial charges, and the employability of their graduates or the relationship the University has with the Department of Education. 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."^{vi}

Below is a brief overview of three of the four areas regarding the Rule; however, vendors are required to remain in compliance with the entire Misrepresentation Rule.

Statements about Educational Programs:

Regarding the nature of the educational programs – AU cannot be listed in a manner that would suggest or imply it offers degree programs that it does not or that its degree programs provide benefits (e.g., automatic qualification for or certification to a specific profession) that they do not.

Statements about Financial Charges:

Regarding the financial charges – misrepresentative statements regarding AU's financial charges are prohibited. Please note, the AU website is an excellent source to find the most current information available on tuition and fees, total program costs, the net price calculator, etc.

Statements about Employability of the Graduates: Regarding employability of the graduates – vendors are prohibited from making misleading statements regarding the possibility of or likelihood of employment for AU grads, as there is no guarantee that any student attending or completing any program will obtain employment. There are many factors including, but not limited to, the student seeking employment, the student's overall qualifications for a specific job, and the economic conditions and availability of jobs. The main AU website (ashford.edu) has additional information related to this area.

The Federal Communications Commission

Telephone Consumer Protection Act of 1991

The United States Congress enacted the Telephone Consumer Protection ACT (TCPA) in 1991. This act restricts the making of telemarketing calls and the use of automatic telephone dialing systems and artificial or prerecorded voice messages. This act applies to marketers as well as carriers and is upheld through the FCC which has jurisdiction over telemarketing.

On February 15, 2012, the FCC issued its Final Rules related to changes made to the TCPA. The new rule adopted significant amendments, including new consent to contact standards for solicitation calls made to mobile phones as well as prerecorded solicitation calls made to residential and wireless telephone numbers. The Office of Management and Budget finalized the rule on October 16, 2012 in the Federal Register where it stated prior express written consent is needed for all autodialed or pre-recorded telemarketing calls to wireless numbers and for prerecorded calls to landlines by **October 16, 2013**.^{vii} It is the expectation of the Marketing department that all vendors will be in compliance with this amendment, and collect the prior express written consent from the prospective student, according to the standards outlined by Marketing and AU.

State Requirements

Individual states address false advertising and related consumer protection issues as well, but several may regulate the same conduct differently by identifying several types of problems: i.e. false advertising, misleading, deceptive trade practices, or unfair sales tactics. It is important that vendors are aware of each state's advertising laws and adhere to them. Furthermore, vendors are required to have the appropriate licensure to operate in a given U.S. state.

DEFINITIONS

This section will provide a brief explanation of common terms/phrases that are presented in this Guide:

Media Buyer: This is the BPI Marketing representative who is responsible for purchasing media in the form of inquiry generation and is responsible for managing the vendor/third-party aggregator relationship.

Marketing Compliance specialist: A BPI representative responsible for monitoring the /third party lead aggregators for compliance with internal and external policies and applicable regulation. The Marketing Compliance specialist will communicate on a regular basis remediation requests to vendor with respect to any noncompliance infractions of this Guide.

Vendor/Third Party Vendor, Third-Party Lead Aggregator(s): These terms are used interchangeably, as they refer to the same entity—it is defined as any person, corporation, partnership or any other type of entity that is authorized by Respondents to provide prospective student inquiries to BPI on behalf of AU.

Onboarding documents: These refer to various documents that are forwarded to the vendor during the first phase of establishing a relationship a media campaign with Marketing in order to provide prospective student

inquires to the University. Examples include the content brand standards and the list of programs approved to be advertised.

Dojo: The Dojo is the lead management system that BPI utilizes to house prospective student information.

Content Brand Standards: this document is the universal ad copy for the University. This document has gone through an in-depth creative and vetting process and is the main resource a vendor/third party aggregator should utilize to create an effective campaign on behalf of AU. If the vendor/third party aggregator wishes to create its own unique ad copy, they must follow the guidelines listed under "Advertising Approvals", please see p. 7-8 of this Guide.

MARKETING and ADVERTISING COLLATERAL

Marketing Copy Distribution

Vendors are responsible for ensuring its advertising copy is updated with the most current brand voice, logos, and Content Brand Standards, which are supplied, when updates are available, by BPI Marketing in support of AU, must be used in its original form and implemented across all URLs where the brand logo, and/or the University program descriptions are present.

- **Updates to the Content Brand Standards will be issued via email by Bridgepoint's Marketing team. Any update to the Content Brand Standards is considered high-priority.**
- **Once issued, vendors will have two (2) weeks to implement all updates to their marketing collateral (URLs) and ensure their affiliates/partner websites**
- *In the event the new version of the Content Brand Standards is not received or is provided incorrectly, please contact Marketing or Marketing Compliance for a new copy.*
- **Have questions? Contact your Media Buyer point-of-contact or a Marketing Compliance specialist. Contact information is located on p. 32 of this Guide.**

Want to use different ad copy? If a vendor intends to use /create different, unique ad copy, prior approval is required.

Unique Advertising Approvals

If seeking approval for non-standard ad copy it will need to receive prior approval before use. Please submit any non-standard AU branded copy (unique copy) to Media Buyer(s) who will then submit the advertising creative, and or ad copy through the BPI internal review process. This ad copy will be reviewed by the Content and Marketing Compliance departments.

Responsibility for Affiliates:

All unique copy created by a vendor's affiliate is the vendor's responsibility. Marketing Compliance requires each vendor to communicate these advertising approval requirements to all of its affiliates.

Submission Requirements:

- When submitting unique copy, include a description indicating where the content will appear; including URLs; if the content will appear on multiple Web pages, each page must be submitted for approval.
- Plan your creative work and allow a minimum 2 weeks for review and approval of your submitted unique creative and or copy.
- Approval requests can be submitted to your assigned Bridgepoint Education Inc. Media Buyer and cc' Amy Yarnall, amy.yarnall@bpiedu.com, Marketing Compliance Manager.
- Questions can be directed to. Kristopher Seanez, Kristopher.Seanez@bpiedu.com, or Janea Morgan, Janea.Morgan@bpiedu.com, Marketing Compliance Specialists.

- If submitting an email campaign, email campaign submissions have additional requirements; please see p. 13-14 of this Guide for more information.

Submission Rejections:

- If the advertising creative/and or copy is not approved, feedback will be provided as to "why" and the vendor will have the opportunity to resubmit a new version for approval. Possible reasons for unique content rejection include material that may misrepresent, provide incentives, and or include inaccurate information or claims.
- Resubmissions must include the edits provided by the Marketing Content, and Marketing Compliance departments.

CORRECTIVE ACTION

Remediation Requests

Ashford University takes compliance violations seriously, and expects its vendors to do the same. Marketing Compliance, and, or the Media Buyers, will inform the vendors, by email or phone, of all outstanding compliance violations.

Marketing expects vendors to be responsive to remediation requests and participate in reasonable surveys and questionnaires from time to time. Moreover, vendors are required to act responsibly and cooperate with Marketing Compliance and the Media Buyers.

Remediation Process:

- Remediation notices will include a detailed description of the finding to enable the vendor to respond. **These violations require the vendors' prompt attention.**
- Each remediation notice will include a deadline for the vendor to implement changes and to correct the compliance issue.
- **For immediate compliance concerns, vendors will have 48 hours only to correct the advertising infraction identified, or the specific URL campaign will need to be suspended immediately until remediation has been completed by the vendor.**
- For more moderate advertising compliance infractions, Marketing Compliance will set a deadline for the vendor to complete remediation activity, ranging from seven to 10 calendar days.
- **Unresolved compliance infractions**, depending on the severity, will be escalated to the Media Buyer team. Escalated compliance infractions may result in potential sanctions on the campaign, including, but not limited to a suspension in the specific URL or the overall campaign.

SPECIFIC ADVERTISING GUIDELINES

The below list outlines specific advertising guidelines vendors and its applicable affiliates are expected to adhere to:

ACCURACY

- All statements and representations must be clear, factually accurate, and as current as possible.
- Advertising statements and promotional material issued on behalf of the AU Brand must accurately represent the characteristics of the institution and its degree offerings.
- Advertising must abide by all applicable laws, regulations, and BPI Marketing compliance policies.

STATISTICS

- Any statistic or ranking used must be directly attributed to a credible source which the user can rely upon and if feasible, the vendor must include a hyperlink to the source. If it is not feasible, the reference should be thorough enough to direct the consumer to the source without the need for a hyperlink.

RANKINGS ON WEBSITES OR LISTS OF TOP/BEST SCHOOLS

- If a vendor or third party aggregator uses a ranking system to categorize or rate the University or an AU program on a given website, then a clear disclosure must be placed on the website. The disclosure must expressly lay out the criteria used for including the University in a ranking system with other colleges.
- The ranking criteria must be visibly disclosed in a clear and conspicuous location for the consumer's reference. If using an algorithm, it must be readily available and display how the data was gathered and processed.
- Superlatives such as "best" or "top" are a form of ranking and must be accompanied by an adequate disclosure. Overall, this attribution, and or disclosure, will assist in helping to prevent misrepresentation of the information which the user may reasonably rely upon. This disclosure will also aid in creating a transparent and optimal experience for website visitors.

USE OF SUPERLATIVES IN ADVERTISING

Definition:

A superlative, according to the Merriam Webster Dictionary is "1.) Of, relating to, or constituting the degree of grammatical comparison that denotes an extreme or unsurpassed level or extent; 2 a. surpassing all others, b. of very high quality."

The AU brand may not be attributed to the following prohibited superlative phrases. Please note that this list is not exhaustive and may include other superlatives not listed below:

- "Best Online College"
- "Fast Online College"
- "Top Online College."
- "Highest Transferability of Credits"
- "Lowest Cost"
- "Great Programs"
- "Greatest Programs"
- "Most Affordable"
- "The Cheapest"

Superlatives may be perceived as a form of hyperbole; and therefore, embellished phrases must be exercised in advertising with care. The use of superlatives in relation to or associated with AU degree programs and the services which the University provides must be substantiated and disclosed to the consumer either in the paid search ad copy, display, or digital advertising; or on the corresponding Web page to which traffic is driven. This disclosure or substantiation must include the research/data/or evidence used to support any claim made.

USE OF CLAIMS URLs

- I. A "Claims URL" is any website whose domain name or landing pages:
 - a. Contain terms which may imply specific characteristics of the colleges listed on the website by applying a superlative to URL, including, but not limited to, "best," "top," "cheapest," "fast," etc. These terms may imply that the entire website is making claim that the advertised schools are associated with the adjective or superlative used to describe the site, such as *best*, *top*, *cheapest*, *fast*, etc.
 - b. Contains terms which may imply that the schools or colleges on the site are all inclusive (for instance, "every," "all," "complete"; or
 - c. Contains terms which may imply that the website is military-associated, for instance "thebestmilitarycolleges.xyz";
- II. Vendors who use "Claims URLs" MUST receive prior approval to list AU on the associated site.

USE OF CAREERS IN ADVERTISING

Any use of careers in relationship to, or associated with, degree programs and their outcomes must align with the AU website career outcomes and the applicable SOC code(s). Furthermore, such advertising is considered non-standard and prior approval is required. See the Advertising Approval section of this Guide for an overview of this policy and its process.

USE OF THE BUREAU OF LABOR STATISTICS IN ADVERTISING

The Bureau of Labor Statistics (BLS) of the U.S. Department of Labor is an independent national statistical agency "responsible for measuring labor market activity, working conditions, and price changes in the economy. Its mission is to collect, analyze, and disseminate essential economic information to support public and private decision-making."^{viii}

The BLS offers a wealth of information and is often used in advertising to support advertising claims. Marketing is understanding of this usage and has released the following policy toward the use of BLS statistics in relation to AU. Therefore, any use of BLS information (career-oriented, salary expectations etc.) must be referenced as such:

- I. Provide an accurate depiction of the data. Please **LIST THE SALARY MEDIAN** and properly disclose the source and direct link to the source in close proximity to the statement. Please do not list the highest salary or the mean salary as the only or predicted outcome for a particular degree.
- II. **Ensure attribution, and/or use of disclosures is provided to help prevent misrepresentation of the information which the user may reasonably rely upon.** Attributing the data will help create a transparent and optimal consumer experience for prospective students and the general public. If referencing the information with the use of a BLS URL, provide the consumer the specific URL link that leads to information referenced.
- III. Marketing expects that vendors will maintain any and all URLs used to support its advertising claims, including those that utilize a BLS URL link, ensuring the information is kept updated. General URLs that lead a consumer to a landing page will not suffice where they need to search for the information will not suffice, unless the referenced data lives specifically on the general landing page.

AU LOCATION STATEMENTS

When referencing the AU degree program location, please note that third-party aggregator advertising is **PERMITTED ONLY FOR AU ONLINE PROGRAMS**; therefore, any reference to the AU campus in Clinton, IA must be clearly marked. Media Buying is conducted for AU online degree programs only. Campus is excluded, therefore the address must be referenced is the San Diego Address. This designation will help avoid misleading or confusing statements about which programs are offered with AU Online vs. AU Campus.

CLAIM SUBSTANTIATION

Vendors and their affiliates are required to have a reasonable basis for brand-based claims made in advertisements concerning the efficacy of the service before the advertisement is released. Claim Substantiation, often referred to as evidentiary support for claims made in advertisements, is a **requirement for all AU advertising**.

When seeking to make claims concerning the efficacy of the service (other than claims from Pre-approved AU Branded material), vendors and their affiliates must seek prior approval from Ashford, as they must for any unique content, and they must also provide Claim Substantiation. It is **imperative that vendors and their affiliates maintain a record of the substantiation of their claims for at least two years after the claim first appears in an advertisement**.

STATE AUTHORIZATION/LICENSURE

Appropriate state and accrediting agency approval is required to operate in a given U.S. state. Vendors must ensure they have the required approvals in order to maintain a business relationship with the Ashford University.

DOJO

Vendors and their affiliates are required to use the most current degree program list in their advertisements and on the lead forms. Refer to the Dojo to obtain this list.

BLOCKED STATES

Refer to the Dojo to view Marketing's list of currently blocked states.

GEO-DISCLAIMER

This statement must be on or in close proximity to the lead generation form for AU:

Certain degree programs may not be available in all states.

VIOLENCE & ILLEGAL ACTIVITY

Please review the general requirements for the AU Brand regarding violence and illegal activity:

- I. Advertising may not constitute, facilitate, or promote illegal activity.
- II. Advertising may not harass, insult, attack, bully, demean, or threaten others.
- III. Advertising may not contain "hate speech," whether it is directed at an individual or a group. Types of "hate speech" include, but are not limited to, race, sex, gender, creed, national origin, religious affiliation, marital status, sexual orientation, language, or identity.
- IV. Advertising may not target minors.
- V. Advertising may not include content that infringes upon or violates the rights of any third party, including copyright, trademark, privacy, or other personal or proprietary rights.

DISCLOSURES

Gainful Employment Disclosure

Gainful Employment disclosure is required on all promotional material whenever a specific program is mentioned. (i.e., if a vendor has a long program list on a website, the list must have the University's program disclosure statement, and link, prominently displayed on the page.)

Required Disclosure Statement

For more information about on-time completion rates, the median loan debt of students who completed each program, and other important information, please visit: <http://ashforddisclosures.com/>

The required disclosure information has been provided to the vendor via the onboarding documents in the Dojo and can be accessed through the Asset Library.

Program Terms and Conditions

Specific programs are accompanied with certain terms and conditions. If a vendor chooses to list a program description, the corresponding terms and conditions must also be listed. Refer to the current issue of the AU Content Brand Standards for programs with required terms and conditions. If you're unsure if you have the most current copy, contact Marketing Compliance Specialists, Kristopher Seanez, kristopher.seanez@bpiedu.com, or Janea Morgan, janea.morgan@bpiedu.com.

ACCREDITATION

Below is the approved accreditation statement for third-party aggregator-use. If listing the Ashford University accreditation, please use this approved statement only.

Ashford University is accredited by WASC Senior College and University Commission (WSCUC), 985 Atlantic Avenue, Suite 100, Alameda, CA 94501, 510.748.9001, www.wascsenior.org.

SUSPECTED TRADEMARK INFRINGEMENT (™)

A trademark is a distinctive name, symbol, motto, or design that legally identifies a company or its products and services. Bridgepoint Education's Marketing department proactively safeguards the Ashford University brand. Please adhere to the following Guidelines:



GENERAL POLICY ON TRADEMARKS

- I. Aggregators are prohibited from bidding on AU trademark terms or utilizing the logos of the schools or utilizing copyrighted content without prior permission from the Marketing department. This usage includes variations, plurals, and misspellings of trade names.
- II. Trademark terms should be set up as negative keywords, including: Ashford University, Ashford
- III. Vendor abuse of this policy will not be tolerated; such acts may have potential damages to the brand and potentially dilute the brand.

POLICY ON AGGREGATOR SUSPECTED PAID SEARCH TRADEMARK INFRINGEMENT

- I. Aggregators may not buy AU trademark terms for paid search advertising efforts. This usage includes all variations, plurals, and misspellings of these trade names.
- II. Aggregators are restricted from using trade name terms in the body of paid search ad messages, or display URL's (for both paid and natural search) regardless of the term(s) purchased, generic or otherwise.
- III. Trademark terms must be set up as negative keywords, including: Ashford University, Ashford
- IV. If conducting Paid Search, please reach out to Marketing for a complete list of AU's trade terms and its variations in order to set them as negative keywords.

POLICY ON SUSPECTED SEO TRADEMARK INFRINGEMENT

For SEO efforts, trademark terms should be set up as negative keywords, including: Ashford University and Ashford.

REMEDATION PROCESS

It is the expectation of the Marketing Department that upon notification of any suspected "TM" infringement, the aggregator will have forty-eight (48) hours to respond and remove the University from the SEM campaign. If such an issue arises a representative from Marketing or Marketing Compliance will be in contact with the applicable vendor.

Any found instance of suspected infringement will be escalated to Marketing for its review.

Persons with information regarding suspected trademark infringement issues on the AU brand are encouraged to inform Marketing or Marketing Compliance of any suspicious activity.

EMAIL

Guidelines to Follow for a Compliant Email Message:

Email Marketing must remain compliant with the CAN-SPAM Act, which includes messages intended to sell a product or service. Third-party aggregators are prohibited from conducting an email campaign which references AU's name, logo, program offerings, or other University information, for the purpose of driving traffic to a vendor or affiliate site where marketing offers are available for the consumer's review and consideration, without appropriate authorization from Marketing. Without approval, email campaigns are considered a prohibited activity for third-party aggregators.

If a vendor wishes to conduct an email campaign containing the AU Brand, or linking directly to an AU branded landing page, it must receive prior written permission from Marketing and undergo Marketing Compliance Review. To seek approval, vendors are required to submit a plan, outlining the proposed email campaigns, including such details:



The image shows a screenshot of an email client's 'Compose' window. On the left is a 'Send' button with an envelope icon. To the right are four input fields: 'To...' with the text 'Prospective Student', 'Cc...' (empty), 'Bcc...' (empty), and 'Subject:' with the text 'Your Advertisement Statement'.

Submit the following for approval:

- Specify if the email campaign is a nationally-focused email campaign, specific to a demographic or includes state and its residents,
- Provide the campaign ad copy and creative;
- Provide the email subject lines to be used;
- Provide the associated Website landing pages (URLs) to be used within the email and also the destination URLS which the email directs the consumer to;
- Provide the expected lifespan of the email creative
- Include a statement regarding how you (the vendor) maintain compliance with CAN-SPAM requirements
- Provide your unsubscribe policy;
- Ensure every email sent out includes an explicit email disclaimer statement that clearly identifies that the sender of the email is from the vendor and not the associated with the school brand.

Other Requirements:

The vendor will be provided an exclusion list by Marketing Compliance, detailing specific states to which AU is prohibited from advertising as a result of state compliance restrictions on advertising. Work with your Media Buyer contact to ensure any necessary exclusions are implemented.

Appropriate state and accrediting agency approval is required to operate in a given U.S. State, and state agencies may have restrictions on email marketing. Therefore, third-party aggregators are required to have the necessary approval to market and advertise in a given state.

Approval Finalization:

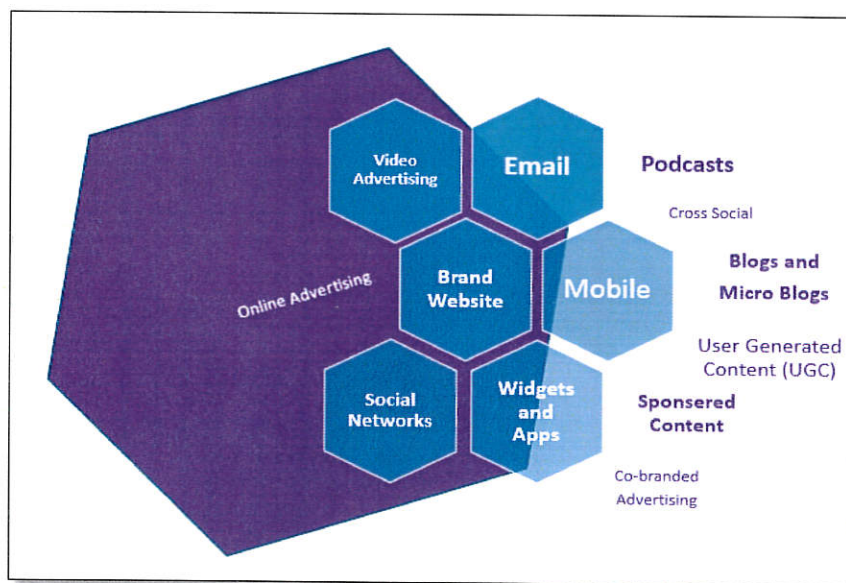
Work with your Media Buyer contact to submit this information for approval. The Media Buyer will submit this through the internal review process; once this information has been submitted, the proposal will be reviewed by Marketing's Content team as well as by the Marketing Compliance team. Please allow at least 2 weeks for approval.

SOCIAL MEDIA

Marketing maintains control over the use of Social Media by the organization and carefully reviews statements made and articles posted on Social Media for SEC and legal concerns. Furthermore, Marketing's Social Media department has a team dedicated to the monitoring of Social Media postings that reference the AU Brand. Furthermore, the team uses Social Media as a resource for AU's own branding and student community-building activities.

It is the policy of AU that posting on Social Media, as related to AU, without prior written permission, constitutes infringement of the AU registered trademark. As such, Marketing's policy instructs vendors and or third-party aggregators to seek prior written permission before use of 'Ashford University' in its Social Media.

Any mention of the AU brand and/or its program offerings in social media is strictly prohibited. Social Media includes, but is not limited to, Craigslist, Facebook, Twitter, YouTube, Google+, Pinterest, Instagram, LinkedIn, Tumblr, Foursquare, Yelp, Reddit.com, Vine, Flickr, etc. The use of Social Media may be linked to any of the following marketing tactics or reside within the media networks themselves. Some may exist within branded websites, emails, video advertising, mobile phone campaigns, etc.



The exception to this policy is as follows:

PRIOR APPROVAL PROCESS

If a vendor wishes to utilize Ashford University branding in their social media campaign efforts, submit your concept to your Marketing point of contact and Marketing Compliance for prior written permission.

Requirements are:

- Submission of a detailed campaign plan.
- A vendor's use of social media will need to be addressed contractually before being authorized to post on AU's behalf, as social media posting comes with its own specific set of legal issues.

MILITARY ADVERTISING POLICY

Any and all military-themed or military-based advertising activities proposed to be conducted by any vendor or affiliate must be pre-approved in writing by Marketing Compliance prior to launch.

Marketing Compliance would like to provide its third-party advertisers some helpful dates and information on current events taking place within online education and specifically related to military advertising. Please be aware of this information and act accordingly.

Important Dates

- *In April 2012, U.S. President Barack Obama signed an executive order in Fort Stewart, GA. The White House said in a press release that the order will help ensure service members and their families have the information they need to make informed educational decisions and protect them from aggressive and deceptive targeting by educational institutions.*
- *In December 2012, the U.S. Department of Veteran Affairs announced that the term 'GI Bill' is now a trademark of the U.S. Patent and Trademark Office and the VA is the sole owner of the mark.*
- *On January 30, 2014, the Departments of Veterans Affairs, Defense, Education and Justice, along with the Consumer Financial Protection Bureau and the Federal Trade Commission announced the launch of a new online complaint system designed to collect feedback from veterans, service members, and their families who are experiencing problems with educational institutions receiving funding from federal military and veterans educational benefits programs, including benefits programs provided by the Post-9/11 GI Bill and the DoD Military Tuition Assistance Program.*
- *As of March 2014, only "authorized third-parties may use the registered trademark 'GI Bill' in print, electronic, radio, digital, or other media as established by the terms of use." Furthermore, at this time, "third-party use of the trademark is restricted to the education and training institutions eligible to receive VA education benefits, State Approving Agencies, and recognized Veterans Service Organizations." Any entity not listed is "prohibited from using GI Bill in any manner that directly or indirectly implies a relationship, affiliation, or endorsement with the Department of Veterans Affairs."*

BPI Marketing is a dedicated advocate for providing accurate, reliable information to all audiences, not only military service members. In support of this, AU provides information to service members regarding the educational opportunities, degree programs, and services which it offers. Aggregators may advertise to this audience but must comply with the following Military Advertising Requirements:

MILITARY ADVERTISING REQUIREMENTS:

Below are the military advertising guidelines for Ashford University:

Military-related Website- is any website that is principally focused on, or relating to, United States military personnel or their families (including, but not limited to, education-related issues) and/or sites that contain substantial volume of symbols or images related to the United States armed forces including but not limited to United States military insignias, soldiers, medals, uniforms, weapons, and/or which contain information related to United States military enlistment, advancement, rules, regulations, bulletins, manuals, weapons, procedures, or military education benefit programs.

Web Content/Creative Review Required

The vendor must send to Marketing Compliance for prior review and approval **ALL** content and creative collateral that is aimed at military. Please refer to the standards listed in the 'Advertising Approvals' section of this Guide as all content tailored to the military is considered unique content and may not be published without prior approval.

"Claims URLs"

- I. Vendors who use military-"Claims URLs" **MUST** receive prior approval to list AU on the associated site.
- II. A "claims URL" is defined as any website whose domain name contains terms which may imply that the website is military-associated, for instance "thebestmilitarycolleges.xyz", or the or any lists of schools or colleges contained therein which are all inclusive, (for instance, "every," "all," "complete"). If using a "Claims URL," the vendor must list on the page, clear and conspicuously, a disclosure that the site is sponsored and is not a comprehensive list.
- III. A "Claims URL" may also imply specific characteristics of the colleges listed on the site by applying a superlative to the colleges listed, including, but not limited to, "best," "top," etc. The superlative may be listed in the domain name or on the landing page environment. These terms may imply that the entire website is making claim that the advertised schools are associated with the adjective or superlative used to describe the site, such as "best," "top," "cheapest," "fast," etc.

In addition, third-party vendors and their affiliates must comply with the following military specific-guidelines:

- I. Vendors and associated affiliates **MAY NOT LIST** AU on a site that suggests/implies the University or any of its programs is endorsed by, affiliated with, or benefits from, the U.S. Government, U.S. Armed Forces, or U.S. Department of Veteran Affairs, when it is/does not. Some exceptions may apply. Please reach out to BPI Marketing Compliance for further information.
- II. The University may **NOT** be associated with websites that use the seals (official or imitation), emblems, and initials of the U.S. Government, U.S. Armed Forces, or U.S. Department of Veterans Affairs, including those of the Navy, Air Force, Marines, Army, Coast Guard, National Guard, or Veterans Affairs. Military seals etc. are trademarked and require written permission and or a license from the military branch in question.
- III. Vendors and affiliates should be aware of the other military trademarks and should abide by the applicable military branch's trademark requirements. **A trademark is any mark, logo, symbol, nickname, letter(s), or any combination of these that points to and can be associated with a military branch.** For example, some Marine Corps. trademarks are as follows: the Eagle, Globe and Anchor emblem, the term Marine Corps., Marines, U.S. Marine Corps, the initials USMC, enlisted rank insignia, unit logos, and USMC slogan: The Few. The Proud; and the official Seal are deemed insignia owned by the U.S. Marines Corps. This list is not exhaustive. Similarly, other military branches have trademarks.
- IV. Vendors **MUST LIST** a prominent and direct disclosure, located adjacent to, or immediately below the website's logo and or name, designating it as a *non-government, privately-sponsored website*.

- V. Wherever a former member of the military presents information and/or responds to questions (i.e. military bloggers), vendors **MUST INCLUDE** a prominent disclosure that informs the consumer whether or not:
 - a.) the individual is retired or no longer in the service; and
 - b.) Lists his or her former branch of service, last rank, rate, and total number of years in service.
- VI. Within the "About" section or "Information" section, etc. of the military-related website, the vendor **MUST LIST** the site as a private website which is not affiliated with the U.S. government, U.S. Armed Forces, or Department of Veteran Affairs.
- VII. Within the "About" section or "Information" section of the military-related website, the vendor **MUST LIST** who owns the website (vendor name), including the address of the vendor's place of business and a direct link to the Home Page of the vendor's corporate website.
- VIII. Vendors **MUST** include their privacy policy within any military-related website.
- IX. If discussing military benefits, accurately disclose all information and attribute it to an official authority on military benefits. Vendors must not represent or imply that schools listed on their websites are the only schools at which Military Benefits could be used. Furthermore, it is recommended to **LIST, WHERE APPLICABLE**, a direct link to the official U.S. Department of Veterans Affairs and Department of Defense websites for obtaining more information about veterans benefits.

In General, Vendors MUST Provide Accurate and Complete Information on ALL of the following:

- I. Institutional accreditation
- II. Programmatic accreditation, only add if instructed by Marketing, on behalf of AU;
- III. Programmatic terms and conditions, including whether a program meets minimum requirements to qualify a student for state licensure and/or certification in relevant occupation(s);
- IV. Clearly define the academic program requirements,
- V. Clearly define financial information, and the total cost of admissions, tuition, and mandatory fees. (NOTE: remember that all such information must be pre-approved by the Content and Marketing Compliance departments if it is unique content; in general, this kind of information will always be unique).
- VI. Institution participation in veteran programs, partnerships, and institution transfer credits.
- VII. Ensure the most current Content Brand Standards are used.
- VIII. Ensure the AU mission statement is clearly articulated and defined.
- IX. Remain in compliance with all other policies addressed within this guide.

ADVERTISING ASHFORD COLLEGE OF EDUCATION PROGRAMS

It is the policy of Ashford University, that all third-party aggregators maintain the accuracy of reporting the degree programs it offers, **including the University's education programs offered online through the College of Education.**

- **MUST NOT** list or describe AU as offering "teaching" degrees or programs and **MUST NOT** represent or imply that AU's education programs are "teaching" degrees or programs.

- Furthermore, any AU education program that is featured in an online, third-party aggregator advertisement or lead form must describe the program and its degree outcomes accurately. **If the degree program is being described, it must include the terms and conditions** listed in the Marketing issued Content Brand Standards or found on ashford.edu.

'Teaching'/'Teaching Degrees' used in Headlines

- I. AU education programs **MAY NOT** be included or listed on Web pages whose headlines or sub-headlines describe succeeding programs as being "teaching degrees," "programs for teaching," or similar.
- II. AU education programs may only be included on a Web page that focuses on "teaching" or "teaching degrees" **IF AND ONLY IF** it is previously approved by Marketing Compliance to ensure accuracy. Among other things, the Web page must include a statement in close proximity to, and clearly identified with, the listing for AU indicating that the University does not offer "teaching degrees" and that "An online degree from Ashford University does not lead to immediate teacher licensure in any state." Marketing Compliance may require additional steps to ensure that the listing is accurate and is not misleading.

This will help to ensure a prospective student, or the general public, does not misconstrue AU educational degrees as meeting various state requirements to become a licensed or certified teacher.

- **Reference the "Advertising Positioning/Layout Section", later in this guide, for added clarification**
- III. If a page lists, or describes, multiple areas of interests (i.e. "Teaching," "Education," "Education Administration"), a clear statement should be included with AU educational programs designating to which specific interest a degree program has been matched.
- IV. Always utilize the current Content Brand Standards, and incorporate the licensing disclosures listed within when citing any of Ashford's College of Education Programs.

If you have any questions regarding this section, please reach out to Marketing Compliance to discuss the matter further and gain additional insight, etc.

ADVERTISING SPECIALIZATIONS AND TRANSFER CONCENTRATIONS

Within the Dojo is a list of approved programs which vendors and respective affiliates are required to list on their websites. However, some AU programs do offer prospective students the ability to add to their degree what is known as a "transfer concentration," which is not to be confused with a degree specialization.

Third-party advertisers and their affiliates **ARE ONLY APPROVED** to advertise the degree program's specialization and **ARE NOT APPROVED** to promote or advertise transfer concentrations. If the vendor wishes to market a degree program's transfer concentrations, they must obtain prior-approval from the Marketing department.

For background, the below definitions outline the distinction between a degree program's specialization and a degree program's transfer concentration.

Definitions:

Specializations are part of a program's curriculum. If a program with a specialization is chosen by a student, the student will receive specific instruction on the chosen specialization. Therefore, all specializations are allowed in Internet advertising and program listings, unless otherwise indicated by Marketing or Marketing Compliance.

Transfer Concentrations are intended for Bachelor's students who have experience and/or extensive transfer credit coursework in a field of study outside of their major at the time of admission. Students must petition for a transfer concentration in a defined subject area and submit a minimum of twelve (12) credits of coursework before approval is granted.

Refer to the onboarding documents, located in the Dojo, to view the approved program list for vendor use.

These particular “transfer concentrations” listed below are no longer allowed to be included in vendor advertising. If you have any questions, please contact the BPI Marketing department.

BA in Organizational Management Concentrations removed from Online Advertising	
<ul style="list-style-type: none"> Accounting Applied Behavioral Science (Human Services) Art History Biology Business Business Administration Child Study Criminal Justice Communications Computer Science Computer Science Studies Culinary Arts Management Early Childhood Education Education Elementary Education Engineering Studies English/Language Arts Environmental Science Fire Science Administration Foreign Language Studies Health Care Administration History Homeland Security 	<ul style="list-style-type: none"> Hospitality Management Human Services Administration Information & Communication Technology Insurance & Risk Management Law Enforcement Administration Liberal Studies Management Marketing Mathematics Physical Education Political Science Project Management Psychology Public Administration Public Safety Administration Recreation Retail Management Sociology Physical Education Public Health Recreation Retail Management Visual Communications
BA in Business Administration Concentrations removed from Online Advertising	
<ul style="list-style-type: none"> Accounting Business Management Computer Science Studies Finance 	<ul style="list-style-type: none"> Hospitality Management Marketing Retail Management
BA in Health Care Studies Concentrations removed from Online Advertising	
the entire BA in Health Care Studies should not be advertised as it is no longer offered	
<ul style="list-style-type: none"> Applied Behavioral Sciences (Human Services) Biology Chemistry Environmental Science Exercise Science Health Care Administration Health Studies Human Resources Management 	<ul style="list-style-type: none"> Liberal Studies Medical Records Medical Technology Physical Education Psychology Sociology Social Services Speech and Language Therapy
BA in Social Science Concentrations removed from Online Advertising	
<ul style="list-style-type: none"> Anthropology Applied Behavioral Science Art Art History Biology Child and Family Development Communications Economics Education Studies 	<ul style="list-style-type: none"> English/Language Arts Environmental Studies. Fire Science Administration Geography Health Studies Law Enforcement Marketing Mathematics Education