



## BOARD POLICY ON ADMISSIONS DEPARTMENT COMPENSATION POLICY NO: BRD-301

POLICY TYPE:	Board Policy
OFFICE:	President
INITIAL POLICY APPROVED:	12/2004
CURRENT REVISION APPROVED:	12/2012

LIBI will not offer to its admissions representatives any payments beyond fixed annual salaries or fixed hourly wages.

In compliance with the Incentive Compensation Prohibition regulations for-profit colleges may not provide any commission, bonus, or other incentive payment based directly or indirectly upon success in securing enrollments or the award of financial aid to any individual or entity engaged in any recruiting or admission activities or in making decisions about awarding FSA program funds. Therefore, in compliance with these regulations, LIBI will ensure that it has clear policies and procedures ensuring that anyone employed in securing enrollment (recruitment) and securing financial aid is salaried or compensated on a fixed hourly basis.

Further, in compliance with federal regulations, LIBI will ensure that the payment of fixed compensation, such as a fixed annual salary or a fixed hourly wage, is not adjusted up or down more than twice during any 12-month period, and any adjustment is not based on the number of students recruited, admitted, enrolled, or awarded financial aid. For this purpose, an increase in fixed compensation resulting from a cost-of-living increase that is paid to all, or substantially all, full-time employees will not be considered an adjustment.

The Board approves the following as factors that may be used to adjust salaries of employees covered by the incentive compensation regulations:

- seniority or length of employment;
- qualitative factors as long as they are not related to the employee’s success in securing student enrollments or the award of financial aid;
- job knowledge and professionalism;
- initiative in work improvement;

- use and understanding of technology;
- traits such as accuracy, thoroughness, dependability, punctuality, adaptability, peer rankings, student evaluations, and interpersonal relations.

Other qualities may be used to justify pay increases for employees subject to the incentive compensation regulations as long as they do not include the number of students recruited, admitted enrolled, or how many students were awarded financial aid.

75 FR 66877 (Oct. 29, 2010). [Guidance issued 3/17/2011]

<https://www.govinfo.gov/content/pkg/FR-2010-10-29/pdf/2010-26531.pdf>