

COLORADO CHINESE MEDICINE UNIVERSITY

1441 YORK ST, SUITE 202 · DENVER, CO 80206 · 303-329-6355 · 303-388-8165 FAX · WWW.CCMU.EDU

Colorado Chinese Medicine University Website Compliance & Admissions Language Policy

Version 1.0

1. Purpose

This policy establishes institutional standards governing all public-facing communications, including website content, marketing materials, admissions communications, and instructional representations.

The purpose of this policy is to:

- Ensure compliance with federal regulations, including 34 C.F.R. § 685.401 (Borrower Defense to Repayment)
- Prevent misrepresentation, including misleading or unsubstantiated claims related to employment, income, or career outcomes
- Promote consistent, accurate, and responsible communication across the institution
- Protect both students and the institution from misunderstanding or misinterpretation of program outcomes

2. Scope

This policy applies to all CCMU personnel and all institutional communications, including but not limited to:

- Official website (ccmu.edu and affiliated domains)
- Admissions materials (interview scripts, brochures, emails)
- Marketing content (online and offline)
- Faculty presentations and instructional materials when discussing career outcomes
- Social media accounts operated on behalf of CCMU

3. Guiding Principles

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All institutional communications must adhere to the following principles:

1. **Accuracy** – Information must be factually correct and supported by verifiable data where applicable
2. **Clarity** – Statements must not be misleading, ambiguous, or open to misinterpretation
3. **Non-Guarantee** – No communication may imply guaranteed outcomes (employment, income, or business success)
4. **Contextualization** – When discussing general trends or examples, appropriate context and limitations must be clearly stated

4. Prohibited Representations

The following types of statements are strictly prohibited in all CCMU communications:

4.1 Employment and Income Guarantees

- “Guaranteed job placement”
- “Guaranteed income”
- “You will earn [specific amount] after graduation”
- Any direct or implied promise of financial outcomes

4.2 Misleading or Unsubstantiated Earnings Claims

- Specific income figures (e.g., “\$100,000/year”) unless supported by verified, cited, and properly contextualized data
- Earnings projections based on hypothetical calculations presented as realistic or typical outcomes
- Statements that imply typical or expected income without qualification

4.3 Implied Financial Outcomes Through Models

- Patient volume × price calculations that lead to implied income
- “Typical clinic revenue” models presented without clear disclaimers
- Graphs, projections, or scenarios that may be interpreted as expected financial outcomes

4.4 Absolute or Unqualified Success Claims

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- “Successful career” (without qualification)
- “High-demand profession” (without context or variability)
- “You will be able to run a successful clinic”

5. Permitted and Recommended Language

The following types of language are permitted and encouraged:

5.1 Career and Outcomes Language

- “Career opportunities may include...”
- “Outcomes vary based on individual effort, location, and market conditions”
- “The program provides foundational training for professional development”

5.2 Educational Context Language

- “For educational purposes only”
- “Illustrative example”
- “Conceptual model”

5.3 Practice Development Language

- “Practice development”
- “Patient-centered care”
- “Long-term sustainability”

6. Required Disclaimer

The following disclaimer must be included in all relevant materials where career outcomes, business development, or clinical practice are discussed:

“Career outcomes, including employment, patient volume, and income levels, vary widely based on individual effort, geographic location, and market conditions. CCMU does not guarantee employment, income, or business success.”

7. Website Content Standards

All CCMU website content must comply with the following:

7.1 Prohibited Content

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- Income calculations or revenue projections
- “Typical” or “expected” earnings statements
- Financial modeling that can be interpreted as income guarantees

7.2 Required Practices

- Include disclaimers where appropriate
- Use neutral, educational language
- Avoid exaggeration or promotional overstatement

8. Admissions and Recruitment Standards

8.1 Admissions Representatives Must Not:

- Make verbal or written promises regarding employment or income
- Provide specific income figures as expected outcomes
- Pressure applicants using exaggerated career claims

8.2 Admissions Representatives May:

- Describe general career pathways
- Explain variability in outcomes
- Refer applicants to official written materials

8.3 Required Practice

- All applicants must sign an acknowledgment confirming that:
 - Employment and income are not guaranteed
 - Outcomes depend on individual factors

9. Faculty and Instructional Guidance

9.1 Faculty Must Not:

- Present hypothetical models as real-world expected outcomes
- Suggest typical income levels without proper context

9.2 Faculty May:

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- Use models for educational purposes
- Discuss business concepts in general terms

9.3 Required Condition

All instructional examples involving financial concepts must be clearly labeled:

“This example is for educational purposes only and does not represent actual or expected income.”

10. Review and Approval Process

- All new website content must be reviewed prior to publication
- Marketing materials must be approved by designated administrative personnel
- Periodic audits of website and admissions materials will be conducted

11. Training and Implementation

- Admissions staff must receive training on this policy
- Faculty will be informed of relevant instructional guidelines
- Compliance awareness will be incorporated into institutional operations

12. Enforcement

Failure to comply with this policy may result in:

- Required content revision
- Removal of non-compliant materials
- Additional training or corrective action

13. Effective Date

Effective Date: 3/24/2026

Approved by: Songtao Zhou, President / CEO