

APPLICATION FRAUD

Overview

The Common Application, Inc. (“Common App” “Organization” or “our”) takes College and/or University Admissions application fraud, misrepresentations, or other inappropriate acts or omissions in connection with an application using our services seriously. Common App monitors instances of alleged fraud perpetrated on our websites, our mobile phone applications, our portals, our admissions and transfer application forms, our recommender forms, and across all the services that Common App provides (collectively, the “Solution”). This includes but may not be limited to alleged fraud that Common App identifies, allegations of fraud by a Reporting Individual or Reporting Member, misrepresentations, or other inappropriate acts or omissions in connection with a Member college and/or university admission application by a Registered User.

Common App’s [Terms of Use Policy](#) expressly prohibits Registered Users from using our Solution for any fraudulent, unlawful, deceptive, or other harmful or injurious purposes, including but not limited to the transmission of materially inaccurate or untrue information through the Solution. Consistent with Common App’s Terms of Use and Privacy Policy, in our sole discretion, Common App reserves the right to limit, restrict, or terminate access to the Solution by any Registered User alleged to have engaged in Fraud or other misuses on a temporary or permanent basis. Common App also reserves the right to disclose information from or about a Registered User or in connection with an application as required by law and consistent with our Privacy Policy, which can be accessed [here](#).

Scope

This policy applies to all Registered Users, Reporting Individuals, and Reporting Members of Common App’s Solution.

Fraud

Common App defines Fraud as an intent to deceive, mislead, or otherwise perpetuate misinformation upon a Common App member regarding the candidacy of a student-applicant for admission. An alleged act of Fraud generally occurs, for example, when information is entered by a Registered User into the Solution intending to deceive or mislead a member. Fraud may occur in the following circumstances, without limitation:

- i. Submitting fabricated or materially misleading letters of recommendation;
- ii. Submitting fabricated, untrue, or otherwise inaccurate transcripts and/or test scores;
- iii. Submitting plagiarized essays or other written or oral material, or intentionally misrepresenting as one’s own original work: (1) another person’s thoughts, language, ideas, expressions, or experiences or (2) the substantive content or output of an artificial intelligence platform, technology, or algorithm;
- iv. Materially misrepresenting an individual’s background, role, job title, or other qualifications;
- v. Perpetuating a false identity and/or using fictitious or materially inaccurate applicant, counselor, or recommender contact information; and/or
- vi. Circumventing the use of official counselor communication channels.

Registered User

An individual who opts to register an account using the Common App Solution and agrees to provide accurate, complete, and up-to-date information submitted through the Common App Solution. Registered Users may include, for example, first-year or transfer student applicants (or their parent or guardian, as applicable), counselors, teachers, advisors, or other professionals who work with applicants.

Reporting Individual

An individual who reports to Common App an instance of Fraud or alleged Fraud by an applicant or other Registered User in connection with an application. These individuals may include, without limitation, an

applicant's counselor, recommender, high school representative, school advisor, parent or guardian; a government agency or other public authority; a Registered User; or other relevant third parties.

Reporting Member

A member College or University that reports to Common App an alleged Fraud by an applicant or other Registered User in connection with an application.

Identification and/or Report of Alleged Fraud

Common App is committed to creating an admissions application Solution that ensures access, equity, and integrity in the higher education admissions process for Common App members, applicants, and recommenders. Common App also recognizes the emotional and practical challenges of the admissions process for many applicants. As such, Common App provides education and reminders to applicants regarding the risks and consequences of Fraud.

When Common App identifies or receives a report of alleged Fraud from any Reporting Individual or Reporting Member, Common App will adhere to the following steps:

- Common App will provide written notice to the Registered User alleged of fraud. This notice shall state that Common App received an allegation of fraud from [the source identified by name] in connection with an application and is taking reasonable efforts to determine if Common App's Terms of Use have been violated.
- Upon such reasonable efforts to investigate whether the alleged fraud occurred, Common App may communicate with the Reporting Member or the Reporting Individual to share information about the investigation, as appropriate under the circumstances.
- Common App will subsequently share our determination regarding the investigation of the alleged fraud with the accused Registered User. If Common App determines that Fraud has occurred, Common App will notify the Registered User and provide the basis for the fraud determination.
- A Registered User who receives notice that Common App has determined a violation of our Terms of Use occurred shall be provided an opportunity to appeal Common App's decision within ten (10) business days from the date of Common App's written notice by submitting a written statement and any relevant supporting documentation refuting the Fraud determination or otherwise explaining the circumstances around the misconduct.
- Within fourteen (14) business days of receiving a Registered User's statement and supporting documentation, Common App will review the Registered User's submission and, as applicable, contact relevant parties for additional information or take other actions as deemed appropriate.
- Subsequent to the conclusion of the 14-day review period, Common App will make a final determination regarding whether the Registered User has violated our Terms of Use or committed Fraud as defined in this Policy and will communicate its findings to the Registered User and Reporting Individual in writing.

Other Considerations

Common App does not guarantee confidentiality or anonymity to any Reporting Individual. In making reasonable efforts to investigate if an alleged Fraud occurred, Common App will maintain confidentiality to the greatest extent possible. In Common App's sole discretion, Common App may disclose or withhold the name of a Reporting Individual or Reporting Member from disclosure to the Registered User who is alleged of Fraud and/or other relevant parties.

Upon request by a Reporting Member or on our own volition, Common App may, in our sole discretion and consistent with our Privacy Policy, disclose to the member colleges and universities on the Registered User's "My Colleges List" that Registered User's name and Common App's findings regarding the Registered User's alleged conduct.

Common App will not facilitate dialogue or information sharing amongst the Reporting Member or Reporting Individual, student-applicant, other members, or related third parties.

Common App does not require members to report to us every instance of alleged Fraud, but members may do so consistent with the member's own internal fraud detection protocols.

Common App also will not independently judge, evaluate, conduct any verification of, or perform an investigation on any information provided on or about a student-applicant and/or application from a Reporting Member, except to the extent required to address misuse of the Common App Solution consistent with this Policy and our Terms of Use. Any determination made or action taken with regard to the disposition of an application by a member College and/or University for any reason is undertaken solely at the discretion and risk of the member.

Actions Subsequent to a Fraud Determination

Registered Users who have been determined to have engaged in Fraud will be immediately notified by Common App in writing, via their registered email account of the Fraud determination and subsequent actions resulting from such a determination.

Common App in its sole discretion may take action as a result of a Fraud determination which may include permanent suspension, temporary suspension, or termination of their Common App user account, and disclosure of the Fraud to the Registered User's "My Colleges List."