

ORAL ROBERTS UNIVERSITY
Title IV Aid - School Code of Conduct Policy

Oral Roberts University (ORU) strives to educate, counsel, and provide financial resources to all students so that they may achieve their higher-learning goals and fulfill the great commission given in Matthew 28:19 and God's call to Oral Roberts to "Raise up students to hear My voice, to go where My light is dim, where My voice is heard small, and My healing power is not known, even to the uttermost bounds of the earth..."

In compliance with the federal law [HEOA § 487(e)], ORU officers, employees, and agents shall maintain exemplary standards of professional conduct in all aspects of carrying out his or her responsibilities, including all dealings with any entities involved in any manner in student financial aid, regardless of whether such entities are involved in a government sponsored, subsidized, or regulated activity.

Any ORU officers, employees and agents shall refrain from the following:

- 1) Entering into any revenue-sharing arrangements with any lender. The HEOA defines "revenue-sharing arrangement" as any arrangement between an institution and a lender under which the lender makes Title IV loans to students attending the institution (or to the families of those students), the institution recommends the lender or the loan products of the lender and, in exchange, the lender pays a fee or provides other material benefits, including revenue or profit-sharing, to the institution or to its officers, employees, or agents;
- 2) Receiving gifts from a lender, guaranty agency or loan servicer (employees of the financial aid office). No officer or employee of an institution's financial aid office (or an employee or agent who otherwise has responsibilities with respect to educational loans) may solicit or accept any gift from a lender, guarantor, or servicer of education loans. A "gift" is defined as any gratuity, favor, discount, entertainment, hospitality, loan, or other item having monetary value of more than a de minimus amount. However, a gift does not include the following:
 - a) standard material, activities or programs on issues relating to a loan, default aversion, or financial literacy, such as a brochure, workshop or training;
 - b) food, refreshments, training, or informational material provided as part of a training session designed to improve the service of a lender, guarantor, or servicer if the training contributes to the professional development of the institution's officer, employee or agent;
 - c) favorable terms and benefits on an education loan provided to a student employed by the institution if those terms and benefits are comparable to those provided to all students at the institution;
 - d) entrance and exit counseling services provided to borrowers as long as the institution's staff are in control of the counseling and the counseling does not promote the services of a specific lender;
 - e) philanthropic contributions from a lender, guarantor, or servicer that are unrelated to education loans or any contribution that is not made in exchange for any advantage related to education loans, and;
 - f) State education grants, scholarships, or financial aid funds administered by or on behalf of a State;

- 3) Accepting from a lender, or an affiliate of any lender, any fee, payment, or other financial benefit as compensation for any type of consulting arrangement or contract to provide services to or on behalf of a lender relating to education loans. This applies to an officer or employee of an institution who is employed in the financial aid office of the institution or an employee or agent who otherwise has responsibilities with respect to education loans;
- 4) Steering borrowers to particular lenders or delaying loan certifications. For any first-time borrower, an institution may not assign, through the award packaging or other methods, the borrower's loan to a particular lender. In addition, the institution may not refuse to certify, or delay the certification, of any loan based on the borrower's selection of a particular lender or guaranty agency;
- 5) Requesting or accepting from any lender any offer of funds for private loans, including funds for an opportunity pool loan, to students in exchange for providing concessions or promises to the lender for a specific number of Title IV loans made, insured, or guaranteed, a specified loan volume, or a preferred lender arrangement. An "opportunity pool loan" is defined as a private education loan made by a lender to a student (or the student's family) that involves a payment by the institution to the lender for extending credit to the student;
- 6) Requesting or accepting from any lender any assistance with call center staffing or financial aid office staffing. However, a lender may provide professional development training, educational counseling materials (as long as the materials identify the lender that assisted in preparing the materials), or staffing services on a short-term, nonrecurring basis during emergencies or disasters; and
- 7) Receiving anything of value from the lender, guarantor, or group, except for reimbursement for reasonable expenses incurred by the employee for serving on the board. This applies to an employee of an institution's financial aid office (or employee who otherwise has responsibilities with respect to education loans or financial aid) who serves on an advisory board, commission, or group established by a lender or guarantor (or a group of lenders or guarantors).

Any ORU officers, employees or agents pledges to diligently:

- 1) Help students seek, obtain, and make the best use of all financial resources available and provide services that do not discriminate on the basis of race, gender, ethnicity, religion, disability, age, or economic status.
- 2) Respect and protect the confidentiality the students records and of the economic circumstances of the student and student's family. Information will be released only on the written consent of the student and/or student's family, and all policies and procedures shall protect the student's right of privacy.
- 3) Commit to the highest level of ethical behavior and refrain from conflict of interest or the perception thereof.

Any officer or employee of an institution's financial aid office (or an employee or agent who otherwise has responsibilities with respect to educational loans or financial aid) will diligently:

Ensure equity by applying all need analysis formulas consistently across the institution's full population of student financial aid applicants, making every effort to meet the demonstrated needs of all students to the extent funding will permit, in an honest and ethical manner, recognizing that the primary responsibility for financing postsecondary education rests with the student and student's family.