

Title IV Loan Code of Conduct

All Officers and employees of the University of Portland, who have responsibilities with respect to student educational loans, must comply with the Oregon College Loan Code of Conduct, outlined below.¹

Code of Conduct

Revenue sharing prohibition – The University of Portland and its employees are prohibited from receiving anything of value from any education loan lending institution in exchange for promoting the education loan products of that lending institution. This provision does not prohibit University of Portland employees from receiving compensation for conducting non-University business with any education loan lending institution or from accepting compensation that is offered to the general public. This provision also does not prohibit the University of Portland from accepting charitable contributions from an education loan lending institution, so long as the University of Portland gives no competitive advantage or preferential treatment to the education loan lending institution related to its education loan activity in exchange for such support.

Gift and trip probation – University of Portland employees are prohibited from receiving anything of more than nominal value (\$50) from any education loan lending institution during any 12-month period. This prohibition includes trips for university employees paid for by education loan lenders; except that this provision shall not be construed to prohibit any University of Portland employee from receiving compensation for the conduct of non-University business with any education loan lending institution, or from accepting compensation that is offered to the general public.

Advisory board compensation rules – University of Portland employees are prohibited from serving on the advisory board of any education loan lending institution. Education loan lending institutions may obtain advice and opinions of financial aid officials on financial aid products and services through Trade Associations, industry surveys or other mechanisms that do not require service on education loan lending institution advisory boards, provided such person receives no compensation for such service. This provision shall not apply to participation on advisory boards that are unrelated in any way to financial aid or higher education loans.

Preferred lender guidelines – University of Portland "preferred lender lists" must be based on the characteristics of the education loan products – including interest rates, borrower benefits, and services to borrowers – offered by the listed education loan lending institutions rather than on the financial interests of the University. If the University of Portland also makes education loans, the education loan(s) it provides must have characteristics that are comparable to or better than those of the other education loan lending institutions listed.

Preferred lender disclosure – The University of Portland preferred lender list must clearly and fully disclose the criteria and process used to select preferred lenders. Every brochure, web page or other document that sets forth a preferred lender list shall state in the same font and same manner as the predominant text on the document that students and their parents have the right and ability to select the lender of their choice and are not required to use any lenders on the preferred lender list.

¹ This Code was prepared by the Oregon Department of Justice with the assistance of a multi-institution committee coordinated by the Oregon Independent Colleges Association and composed of representatives from independent institutions and community colleges.

Use of mascot, logo, emblem, or name by lenders – The University of Portland shall not authorize or permit an education loan lending institution to use the name, emblem, mascot, or logo of the University; or words, pictures, marks, or symbols readily identified with the University; in the marketing of education loans in any way that implies that the college endorses those loans.

Loan resale disclosure – To be eligible to appear on a preferred lender list, a lender must disclose any agreement(s) to sell its loans to another entity. In addition, no lender may bargain to be a preferred lender with respect to a certain type of loan by providing benefits to a college as to another type of loan.

Lender identification requirement – The University of Portland will not permit employees of education loan lending institutions on campus to identify themselves as employees of the University, and no employee of an education loan lender may work in or provide staffing assistance to the University of Portland Office of Financial Aid; except that employees of the University that also make education loans may perform their normal functions as long as those functions comply with relevant laws and regulations, and with the other items of this Code of Conduct.