



Office of Financial and Business Affairs

2 February 2021

MEMORANDUM FOR RECORD

SUBJECT: University Policy on Incentive Compensation Prohibition

1. Southern Nazarene University (SNU) is a higher educational institution in partnership with the Department of Education, Department of Veterans Affairs (VA), and Department of Defense (DOD) for awarding and/or managing Federal Student Aid (FSA) program funds on their behalf at the university.
2. The policy applies to any, and all recruiters in the SNU College of Professional and Graduate Studies, the SNU College of Undergraduate Studies, and to all SNU administrative and staff departments.
3. SNU does not allow payment of commissions, bonuses, or other incentive payment to any of our faculty and staff employees based directly or indirectly on success in securing student enrollments or financial aid to any individual or entity engaged in recruiting or admission activity or in making decisions about awarding financial student aid and tuition assistance funds.
4. Directors of departments that are involved directly or indirectly with recruiting and admissions activities will ensure their employees are aware of and have received on-boarding training on SNU's incentive compensation prohibition policy. Violations of this policy must be reported to HR immediately for resolution.
 - a. Supervisors will not offer, and employees will not accept, reward or remuneration from a college, agency, or organization for placement of recruitment of students.
 - b. Employees will be compensated in the form of a base salary or base hours rate of pay, rather than commissions or bonuses based on the number of students recruited. Employees will not contract with secondary school personnel for remunerations for referred students.
 - c. Employees will refrain from high-pressure recruitment tactics such as making multiple unsolicited contacts and engaging in same-day recruitment and registration for the purpose of obtaining tuition assistance funds and securing military service member enrollments.
 - d. Supervisors will review this policy and answer any questions with employees engaged in recruiting or admission activity on an annual basis during the employee's annual performance appraisal review.
5. Point of contact for this university policy is the undersigned at office: (405) 491-6392 or email: svanwinkle@snu.edu.

A handwritten signature in black ink that reads "Shannon VanWinkle". The signature is written in a cursive, flowing style.

Shannon VanWinkle
University Controller