

## **CODE OF CONDUCT**

The purpose of this policy is to prohibit conflicts of interest in situations involving student financial aid and to establish standards of conduct for employees with responsibility for student financial aid.

### **Revenue Sharing Arrangements**

The institution will not enter into any revenue-sharing arrangement with any lender.

### **Gifts**

No employee may accept any gift from a lender, guarantor, or servicer of educational loans. A gift to a family member of an employee or to any other individual based on that individual's relationship with the employee shall be considered a gift to the employee if the gift is given with the knowledge of the employee and the employee has reason to believe the gift was given because of the employee's position at the institution.

### **Prohibited Contracting Arrangements**

No employee shall accept from any lender or affiliate of any lender any fee, payment, or other financial benefit (including the opportunity to purchase stock) as compensation for any type of consulting arrangement or other contract to provide services to a lender or on behalf of a lender relating to education loans.

### **Interaction with Borrowers**

When participating in the Federal Direct Loan Program, the institution may assign a first-time borrower's Federal loan to the Federal Government as the lender. Under no circumstances will the institution assign a student's private student loan to a particular lender, or refuse to certify or delay certification of any private loan, based upon the borrower's selection of lender or guaranty agency.

### **Private Loans**

The institution will not request or accept from any lender any offer of funds to be used for private education loans, including funds for an opportunity pool loan, to students in exchange for the institution providing concessions or promises regarding providing the lender with: a specified number of private loans, or a preferred lender arrangement for private loans.

### **Staffing Assistance**

The institution will not request or accept from any lender any assistance with call center staffing or financial aid office staffing.

The institution may accept assistance from a lender related to:

- Professional Development Training
- Educational Counseling Materials
- Debt Management Materials
- Financial Literacy Materials

### **Advisory Board Compensation**

No employee who serves on an advisory board, commission, or group established by a lender or a group of lenders may receive anything of value in return for that service.

Expenses incurred while attending professional association meetings, conferences, or in connection with service on an advisory board must be paid by the institution.

Meals offered as a part of meetings, conferences, or other events may be accepted if all participants in the meeting or events are offered the meal or if the meal is included as part of the registration fee.