

# INSTITUTIONAL CODE OF CONDUCT FOR EDUCATION LOANS

The officers, employees, and agents of the institution are expected to always maintain exemplary standards of professional conduct in all aspects of carrying out their responsibilities, specifically 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. In doing so, the financial aid professionals, officers, employees and agents of the institution shall:

- Refrain from taking any action for their personal benefit.
- Observe the ban on revenue sharing arrangements with any lender or entity offering loans to students.
- Refrain from any contracting arrangements concerning any aspect of education loans and will not accept any fee, payment or other financial benefit as compensations for any type of consulting arrangement or contract to provide services to or on behalf of a lender relating to education loans.
- Refrain from taking any action they believe is contrary to law, regulation, or the best interests of the students and parents they serve.
- Ensure that the information they provide is accurate, unbiased, and does not reflect any preference arising from actual or potential personal gain.
- Be objective in making decisions and advising their institution regarding relationships with any entity involved in any aspect of student financial aid.
- Refrain from steering borrowers to any lender or delay loan certifications, assign lenders through award packaging or any other methods, or otherwise refuse to certify any loan based on the borrowers selection of a particular lender or guaranty agency
- Refrain from soliciting or accepting anything of other than nominal value from any entity (other than an institution of higher education or a governmental entity such as the U. S. Department of Education) involved in the making, holding, consolidation or processing of any student loans, including anything of value (including reimbursement of expenses) for serving on an advisory body or as a part of a training activity or sponsored by any such entity.
- Observe the prohibition on offers of funds for private loans from any lender, including funds for opportunity pool loans, to students in exchange for concessions or promises to the lender.
- Disclose to their institution, in such manner as their institution may prescribe, any involvement with or interest in any entity involved in any aspect of student financial aid.

- Refrain from offers of staffing assistance from lenders for any service other than professional development training, educational counseling materials or staffing on a nonrecurring basis during emergencies or disasters.

There will never be any difference between “ethical” and “best” practices. The ethical practice is the best practice.