

Institutional Code of Conduct for Private Education Loans

November 12, 2019

1 - Introduction

The Higher Education Act requires institutions to develop and implement a code of conduct with respect to private education loans. This code of conduct addresses standards of business for the working relationships between University officials and private loan lenders and servicers.

2 - Purpose

This code of conduct is intended to provide written guidance to University officials in regards to interactions with lending institutions and agents thereof. It follows University policies of providing financial aid to students in a manner that is free from conflict of interest, in the best interest of the student, and in compliance with current laws and regulations. This code of conduct is published as a part of our internet site Consumer Information material.

3 - Definitions

For the purpose of this policy, key terms are defined as follows:

Private Education Loan- any loan not made under Title IV of the Higher Education Act. The loan is issued to students for higher education expenses, and can refer to loans that are disbursed to the university, or directly to the student. The following are not considered private education loans, and are not covered by this code of conduct:

A loan secured to cover educations expenses through the following means:

- Residential mortgage transaction
- Reverse mortgage transaction
- Extension of credit under an open-end consumer credit plan (i.e., a home equity line of credit, or open line of credit tied to a Certificate of Deposit)
- Real property
- A dwelling

An extension of credit in which this institution is the lender if the term of the extension of credit is 90 days or less, or an interest rate will not be applied to the credit balance and there term of the extension of credit is one year or less.

Lending Institution – any entity that makes loans, guarantees or services to students, parents, or others for the purpose of financing the expenses of a higher education

Agent – Any employee of the university (Officers, trustees, and employees)

4 - Personnel Affected

This code of conduct applies to all employees of the University, including administrators, faculty, staff and representatives. All employees with private loan responsibilities will be updated annually of the terms of this code of conduct and any changes made.

5 - Policies

Gifts

No agent who is employed by the institution or who has responsibilities with private education loans may solicit or accept any prohibited gift from a lending institution. Prohibited gifts include: any gratuity, favor, discount, entertainment (including expenses for shows, sporting events, or alcoholic beverages), hospitality (including private parties of select training or conference attendees), loan, or other item having a monetary value of more than *de minimus* amount. A gift includes services, transportation, lodging or meals whether provided in kind, by purchase of a ticket, payment in advance, or reimbursement after the expense has been incurred.

An agent of the institution may accept items of a *de minimus* amount from an private education loan lender that are offered as general marketing or advertising or to create good will. Examples of *de minimus* gifts include, but are not limited to: pens or pencils, notepads, sticky-notes, rulers, calculators, small tote bags, calendars, and other individual office supply items.

Philanthropic Gifts/Contributions to the Institution

The University will not accept any philanthropic contributions from a lending institution related to the loans that are provided to students or that is provided to gain an advantage related to private education loans. In addition, we will not accept scholarships or grants from a private lending institution in exchange for loan applications or referrals for applications, or for a specific volume or dollar amount of private loans received.

The University may accept philanthropic contributions from a lender that are not related to the loans provided to our students or that is not provided in exchange to receive an advantage related to private education loans.

An agent for a lending institution may serve as a member of the University's board of directors, as long as the agent does not participate in decision making related to private education loans

points, premiums, additional interest, or financial support to the lender for the purpose of that lender extending credit to the borrower.

The University will not accept or request an offer of funds from an opportunity pool to be used for private education loans.

Publications

We do not permit lenders to print or distribute any University related publications. A lender is not permitted to use the University logo in the marketing of private education loans to our students or parents.

The University does accept limited quantities of publications from a lender as informative references for staff regarding the private education loan options that are available. We do not distribute these publications to students or parents.

Revenue Sharing Arrangements

An agent of the institution will not solicit or accept a fee, revenue or profit sharing, or other material benefit from a private education lender that issues loans to or on behalf of our students in exchange for our recommendation of that lender or the lender's loan products.

Staffing Assistance

The University will not allow any member of a lending institution to staff the Division of Operational Excellence under any circumstances.

Student Aid Related Programs

We may accept, free of charge, from a lending institution workshops or trainings that are designed to improve the lender services or contribute to staff professional development. The lender or guarantor must disclose its identity in the materials that it assists in preparing or providing and the materials must not promote its education loan products.

Technology

The University will not accept computer hardware or software unrelated to the processing of private education loans from a lender. We will not accept free data transmission services from a private loan lender that is unrelated to electronic processing of private education loans. We will accept, free of charge, technology that is associated with loan processing. Toll-free numbers may be used to obtain information and assistance with the processing of a private education loans.

Training

An agent of the university will not accept payment of training or conference registration, travel, or lodging costs from any lender. We may accept, free of charge, from any lender or guarantor workshops or trainings that are designed to improve the lender services or contribute to staff professional development.

Travel and Lodging

An agent of the institution will not request or accept lodging or travel costs from a lender.