

TITLE IV LOAN SCHOOL CODE OF CONDUCT

Staff members in the Financial Aid Office are bound to act in compliance with the National Association of Student Financial Aid Administrator's Statement of Ethical Principles and Code of Conduct for Institutional Financial Aid Professionals. To prevent any real or perceived conflict of interest, the additional guidelines will be followed.

- The College will not enter into any revenue-sharing arrangement with any lender.
- The College will not allow a private lender to use the Aquinas name or logo to imply endorsement of any private education loans.
- The College will not enter into an opportunity loan agreement with any lender.
- The College will not accept call center or office staffing assistance from any lender. However, the College may accept training materials for staff and/or educational counseling, financial literacy, and debt management materials for students as long as the lender's product or service is not promoted.
- Staff members may not accept any compensation for consulting services to lenders or serving on a lender's advisory board.
- As a Direct Lending School, the College will process all federal loans through Direct Loans.
- The College will not assign a private lender for any student or refuse to certify a private loan based on lender choice.
- The College will not certify a private loan for a student enrolled at least half time before notifying the student of federal loan eligibility.
- Staff members may not accept gifts worth more than \$10 from loan providers or servicers. However, staff may participate in meals or refreshments in conjunction with meetings or training sessions as long as the events are open to all attendees or are included in a registration fee.

Staff who knowingly fail to follow these guidelines will be subject to disciplinary action.