

STUDENT LOAN CODE OF CONDUCT

1. PROHIBITION OF FINANCIAL ARRANGEMENTS

The college, and college employees, will not accept anything of more than nominal value from any lending institution, guaranty agency, or loan servicer. This specifically includes revenue sharing arrangements and payments or gifts for preferred lender/guarantor/servicer status, and the provision of printing and mailing at below-market prices. It also includes gifts or donations to students or the College endowment and other grants, scholarships or prizes.

2. PROHIBITION OF GIFTS AND TRIPS

College employees may not accept gifts of more than nominal value from any lending institution, guaranty agency, or loan servicer. This includes payments and reimbursement for lodging, meals and travel to conferences, meetings or training seminars.

3. ADVISORY BOARD RULES/COMPENSATION

College employees are prohibited from receiving anything of value for serving on an advisory board, commission or group of any lending institution, guaranty agency, or loan servicer. Employees are also prohibited from any type of consulting arrangement or contract to provide services to or on behalf of a lender, guaranty agency, or loan servicer relating to education loans (except for reimbursement for reasonable expenses).

4. PREFERRED LENDER GUIDELINES

The College's preferred lender list must be based solely on the best interests of the students or parents who may use the list without regard to financial interests of the college. The College will not assign a lender, guaranty agency, or loan servicer to first-time borrowers.

5. PREFERRED LENDER DISCLOSURE

On all preferred lender lists the College will clearly and fully disclose the criteria and process used to select preferred lenders, guaranty agencies, or loan servicers and inform students and parents that they have the right and ability to select the lender of their choice regardless of the preferred lender list. The College will not delay or deny a loan based on a student's choice of lender, guaranty agency, or loan servicer nor steer borrowers to particular lenders, guaranty agencies, or loan servicers.

6. LOAN RESALE DISCLOSURE AND OPPORTUNITY LOAN PROHIBITION

No lending institution, guaranty agency, or loan servicer may appear on a preferred lender list if the lender has an agreement to sell the loans to another lending institution, guaranty agency, or loan servicer without disclosing this fact. In addition, no lending institution may bargain to be a preferred lender, guaranty agency, or loan servicer with respect to a certain type of loan by providing benefits to the College as to another type of loan (opportunity loans, except that the institution may offer loans to international students, at fair market rates, who would be otherwise unable to secure a domestic loan).

7. CALL CENTER AND STAFFING PROHIBITION

The College must ensure that employees of lending institutions, guaranty agencies, or loan servicers never identify themselves to students as employees of the College. No employee of a lending institution, guaranty agency, or loan servicer may ever work in or provide staffing to the College financial aid office.