

# Code of Conduct

We abide by NASFAA's Code of Conduct for Institutional Financial Aid Professionals which states an institutional financial aid professional is expected to always maintain exemplary standards of professional conduct in all aspects of carrying out his or her 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 Office at Saint Anthony College of Nursing is bound by the following:

1. The Financial Aid Office will not enter into any revenue-sharing arrangement with any lender.
2. The Financial Aid Office will not accept any gift having a monetary value of more than a de minimus (more than \$10) amount from a lender, guarantor or servicer of education loans.
3. The Financial Aid Office shall not 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.
4. The Financial Aid Office will not assign a first-time borrower the borrower's loan to a particular lender or refuse to certify or delay certification of any loan based on the borrower's selection of a particular lender or guaranty agency.
5. The Financial Aid Office will not request or accept from any lender any offer of funds to be used for private education loans (as defined in section 140 of the Truth in Lending Act), including funds for an opportunity pool loan, to students in exchange for the institution providing concessions or promises regarding providing the lender with -
  - a. A specified number of loans made, insured, or guaranteed under this title;
  - b. A specified loan volume of such loans; or
  - c. A preferred lender arrangement for such loans.
6. The Financial Aid Office will not accept staffing assistance or "call center" services from lenders. Calls to borrowers as part of the lender's normal customer service are exempt from this policy.
7. No officer, trustee or employee of the College who makes financial aid decisions for the College or who is employed in, supervises, or otherwise has responsibility or authority over the College's Financial Aid Office shall receive anything of value for serving as a member or participant of an student loan advisory board of a lending institution or any reimbursement of expenses for such service.

## Definitions

**Revenue Sharing Arrangement** -- means an arrangement between an institution and a lender under which:

- I. A lender provides or issues a loan that is made, insured or guaranteed under this title to students attending the institution or to the families of such students and
- II. The institution recommends the lender or the loan products of the lender in exchange, the lender pays a fee or provides other material benefits, including revenue or profit sharing to the institution, an officer or an employee of the institution, or an agent.

**Gift** -- means any gratuity, favor, discount, entertainment, hospitality, loan or other item having a monetary value of more than a de minimus (gift of not more than \$10) amount. The term includes a gift of 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.

**Opportunity Pool Loan** -- means a private education loan made by the lender to a student attending the institution or the family member of such a student that involves a payment directly or indirectly, by such institution of points, premiums, additional interest, or financial support to such lender for the purpose of such lender extending credit to the student or the family.