

Education Loan School Code of Conduct

[The following code of conduct applies to the officers, employees and agents of University of Jamestown but primarily affects the financial aid professionals.]

An institutional financial aid professional is expected to maintain exemplary standards of conduct in all aspects of his or her responsibilities. Other University of Jamestown colleagues are to share a common understanding of the code as it relates to their responsibilities. In order to ensure transparency in the administration of the student financial aid program and to avoid the harm that may arise from actual, potential or perceived conflicts of interest, University of Jamestown adheres to the following code of conduct. The financial aid professional shall:

Refrain from taking any action for his or her personal benefit, including revenue-sharing arrangements with any lender.

Refrain from taking any action he or she believes is contrary to law, regulation, or the best interests of the students and parents he or she serves. The financial aid professional works in a complex legal environment. Any doubts as to whether a course of conduct is legally proper should be resolved by referring the matter to University of Jamestown's legal advisors for guidance.

Ensure that the information he or she provides is accurate, unbiased and does not reflect any preference arising from actual or potential personal gain. Students and parents should be able to fully understand their rights, obligations, and alternatives, especially relative to open selection of lenders. University of Jamestown will certify any loan selected by a borrower assuming all eligibility requirements have been met.

Be objective in making decisions and advising University of Jamestown regarding relationships with any entity involved in any aspect of student financial aid.

Refrain from soliciting or accepting anything, including gifts, 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, consolidating or processing of any student loans, including anything of value (including reimbursement of expenses) for serving on an advisory body or as part of a training or sponsored by any such entity. As a general guide, a total retail value of not more than \$10 should be considered reasonable. This element is intended to provide guidance for the financial aid professional to avoid even the appearance of conflict of interest.

Refrain from requesting or accepting from any lender any offer of funds for private loans to students in exchange for providing concessions or promises to the lender for a specific number of loans made, insured, or guaranteed, a specified loan volume, or a preferred lender arrangement.

Refrain from requesting or accepting from any lender any assistance with call center staffing or financial aid office staffing. (There are exceptions such as professional development training, providing counseling materials, debt management materials, etc. provided that the lender is disclosed on the materials; short term nonrecurring assistance during emergencies.)

Refrain from receiving anything of value from the lender, guarantor, or group of lender or guarantors, except that the employee may be reimbursed from reasonable expenses incurred in serving on an advisory board, commission or group. This applies to employees of the University's financial aid offices and those employees who have responsibilities with respect to education loans who serve on an advisory board, commission, or group established by a lender, guarantor, or group of lenders or guarantors.

Refrain from involvement in a contracting arrangement providing financial benefit from any lender or affiliate of a lender.

Refrain from directing borrowers to particular lenders, or refusing or delaying loan certifications.

Report any involvement with or interest in any entity involved in any aspect of student financial aid to the Vice President of Enrollment Management. University of Jamestown's written policy on disclosure of potential conflicts of interest and resolution of such an incident can be found in §108 of the University of Jamestown Staff Handbook (Updated July 2021). It is the obligation of the financial aid professional to strictly abide by the requirements of University of Jamestown, particularly with regard to any activities, involvement, investment or interest in any financial aid-related entity. These principles shall apply throughout the program administration of Federal Direct and Direct PLUS Loans as well as Perkins Loans.

University of Jamestown will not permit a private educational lender to use the University's name, emblem, mascot, logo or any other words, pictures or symbols associated with the University to imply endorsement of private education loans by that lender or vice versa.

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