

Office of Financial Aid Code of Conduct

The Higher Education Opportunity Act (HEOA) of 2008 requires institutions of higher education to develop and enforce a code of conduct that prohibits conflicts of interest for financial aid personnel.

Additionally, as members of the National Association of Student Financial Aid Administrators (NASFAA), OKWU financial aid personnel also adhere to the NASFAA <u>Statement of Ethical Principles</u> and <u>Code of</u> <u>Conduct</u> which contains principles specific to the financial aid profession.

Consistent with the requirements of the HEOA and the NASFAA Statement, OKWU has adopted the following Code of Conduct for financial aid professionals. Other University employees, officers, and agents with responsibilities in respect to education loans must also comply with this policy.

Conflict of Interest

No employee shall have a conflict of interest with respect to any education loan program or other student financial aid program for which the employee has responsibility.

Ban on Revenue Sharing Arrangements

The University shall not enter into any revenue-sharing arrangement with any lender or other vendor working with its financial aid office. The University shall not accept any fee or other material benefit in exchange for recommending a lender to its students.

Gift Ban

No University officer or employee with financial aid responsibilities shall solicit or accept a gift (e.g. a gift of services, transportation, lodging, or meals, provided by purchase of a ticket, payment in advance, or reimbursement) having a monetary value of more than a de minimus amount from a lender, guarantor, or servicer of education loans.

Contracting Arrangements Prohibited

No University officer or employee with financial aid responsibilities shall accept from any lender or lender affiliate any payment or other financial benefit as compensation for any type of consulting arrangement or other contract to provide services to a lender.

Interaction with Borrowers

The University shall not automatically assign a particular lender to any borrower, and shall not refuse to certify or delay certification of any loan based on the lender or guarantee agency selected.

Prohibition on Offers of Funds for Private Loans

The University shall not request or accept from any lender an offer of funds to be used for private education loans in exchange for the University providing the lender with a specified number or volume of federal loans made or in exchange for placement on a preferred lender list.

Co-branding

The University prohibits any private educational lender from using the University's name, emblem and logo as well as any words, pictures, or symbols associated with the University to imply endorsement of private education loans by that lender.

Ban on Staffing Assistance

The University shall not request or accept from any lender any assistance with call center staffing or financial aid office staffing.

Advisory Board Assistance

All employees with financial aid responsibilities shall be prohibited from receiving anything of value from a lender or guarantor in return for service on its advisory board. Reimbursement for reasonable expenses incurred in connection with such service, however, is permitted.