University of Minnesota
Code of Conduct for Financial Aid Professionals

I. Introduction: When Congress passed the Higher Education Opportunity Act in 2008, they required that all schools that participate in the Title IV loan program must have a Code of Conduct that clearly prohibits conflicts of interest for employees involved with financial aid.

II. Individuals Covered: The Code of Conduct for Financial Aid Professionals applies to all officers, employees, and agents of the institution who are responsible for student loans and financial aid.

III. Definitions:

Revenue Sharing: An arrangement between the University and a lender under which a) the University recommends the lender or the loan products of the lender, b) the lender makes Title IV loans to students attending the institution (or to the families of those students), and c) in exchange, the lender pays a fee or provides other material benefits, including revenue or profit-sharing, to the University or to its officers, employees, or agents.

Gift: Any gratuity, favor, discount, entertainment, hospitality, loan, or other item having monetary value of more than a *de minimus* amount. However, a gift does not include:

(1) standard material, activities or programs on issues relating to a loan, default aversion, or financial literacy, such as a brochure, workshop or training;
(2) food, refreshments, training, or informational material provided as part of a training session designed to improve the service of a lender, guarantor, or servicer if the training contributes to the professional development of the University's officer, employee or agent;

(3) favorable terms and benefits on an education loan provided to a student employed by the University if those terms and benefits are comparable to those provided to all students at the institution;
(4) entrance and exit counseling services provided to borrowers as long as the University's staff are in control of the counseling and the counseling does not promote the services of a specific lender;
(5) philanthropic contributions from a lender, guarantor, or servicer that are unrelated to education loans or any contribution that is not made in exchange for any advantage related to education loans, and;
(6) State education grants, scholarships, or financial aid funds administered by or on behalf of a State

Opportunity Pool: A private education loan made by a lender to a student (or the student's family) that involves a payment by the University to the lender for extending credit to the student

IV. Terms:

A. The University bans revenue-sharing arrangements with any lender.
B. The University bans employees of the financial aid office receiving gifts from a lender, guaranty agency or loan servicer. No officer or employee of the University's financial aid office (or an employee or agent who otherwise has responsibilities with respect to educational loans) may solicit or accept any gift from a lender, guarantor, or servicer of education loans.
C. The University bans contracting arrangements. No officer or employee of the University who is employed in the financial aid office of the institution (or an employee or agent who otherwise has responsibilities with respect to education loans) may accept from a lender, or an affiliate of any lender, any fee, payment, or other financial benefit as compensation for any type of consulting arrangement or contract to provide services to or on behalf of a lender relating to education loans.

D. The University prohibits steering borrowers to particular lenders or delaying loan certifications. For any first-time borrower, the University may not assign, through the award packaging or other methods, the borrower's loan to a particular lender. In addition, the University may not refuse to certify, or delay the certification, of any loan based on the borrower's selection of a particular lender or guaranty agency;

E. The University prohibits offers of funds for private loans. The University may not request or accept from any lender any offer of funds for private loans, including funds for an opportunity pool loan, to students in exchange for providing concessions or promises to the lender for a specific number of Title IV loans made, insured, or guaranteed, a specified loan volume, or a preferred lender arrangement.

F. The University prohibits staffing assistance. The University may not request or accept from any lender any assistance with call center staffing or financial aid office staffing. However, a lender may provide professional development training, educational counseling materials (as long as the materials identify the lender that assisted in preparing the materials), or staffing services on a short-term, nonrecurring basis during emergencies or disasters.

G. The University prohibits advisory board compensation. An employee of an University's financial aid office (or employee who otherwise has responsibilities with respect to education loans or financial aid) who serves on an advisory board, commission, or group established by a lender or guarantor (or a group of lenders or guarantors) is prohibited from receiving anything of value from the lender, guarantor, or group, except for reimbursement for reasonable expenses incurred by the employee for serving on the board.