

University of Wisconsin – Whitewater

Code of Conduct for Financial Aid Professionals

- I. Purpose
 - a. The purpose of this policy is to prohibit conflicts of interest in situations involving student financial aid and to establish standards of conduct for employees with responsibility for student financial aid.
- II. Applicability
 - a. The Policy applies to all employees who work in the Office of Financial Aid and all other University employees who have responsibilities related to education loans or other forms of student financial aid.
- III. Definitions
 - a. Conflict of Interest: A conflict of interest exists when an employee's financial interest or other opportunities for personal benefit may compromise, or reasonably appear to compromise, the independence of judgment with which the employee performs his/her responsibilities at the University.
 - b. Gift: Any gratuity, favor, discount, entertainment, hospitality, loan, or other item having a monetary value of more than \$10. 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. It does not include any of the following:
 - i. Standard materials, activities, or programs on issues related to a loan, default prevention, or financial literacy, such as brochure, a workshop or training.
 - ii. Training material as part of a training session that is designed to improve the service of a lender, guarantor, or a servicer of educational loans to the University, if such training contributes to the professional development of the University's employees.
 - iii. Entrance and exit counseling services provided to borrowers to meet the University's responsibilities for entrance and exit counseling under federal law, so long as the University's employees are in control of counseling and such counseling does not promote the products or services of any specific lender.
 - iv. Philanthropic contributions from a lender, servicer, or guarantor of education loans that are unrelated to education loans that is not made in exchange for any advantage related to education loans.
 - c. Revenue-sharing arrangement: An arrangement between the University and a lender under which (a) a lender provides or issues a loan to students attending the University or to their families; and (b) the University recommends the lender or

the loan products of the lender and in exchange the lender pays a fee or provides other materials benefits, including revenue or profit sharing.

- d. Lender: an eligible private educational lender engaged in the business of securing, making or extending education loans on behalf of lender.
 - e. Alternative Loan (private educational loan): a non-title IV loan provided by a private educational lender expressly for post-secondary educational expenses. It does not include an extension of credit under an open-end consumer credit plan or secured by real property.
- IV. Institutional Policy Regarding Education Loans and Student Financial Aid
- a. The University of Wisconsin – Whitewater participates in the William D. Ford Federal Direct Loan Program, which include the Subsidized Direct Loan, the Unsubsidized Direct Loan, the Graduate PLUS Loan, and the Parent PLUS Loan. The William D. Ford Federal Direct Loan Program provides student and parent loans through the U.S. Department of Education. Private loans are also processed for students on a needed basis.
 - b. The University will not enter into any revenue-sharing arrangement with any lender.
- V. Interaction with Borrowers
- a. The University will not refuse to certify, or delay certification of, any federal loan based on the borrower's selection or a particular lender or guarantor agency. As a participant of the Federal Direct Loan Program, the University may assign student borrower's federal loan to the Federal Government as the lender.
 - b. Under no circumstances will the University assign a student's alternative loan to a particular lender.
 - c. All decisions will be made by the borrower in his/her independent review of borrower benefits and lender services.
 - d. The University will not intentionally delay certification of loans based on the borrower's selection of a particular lender or guaranty agency.
- VI. Alternative Loans
- a. The University will not request or accept from any lender any offer of funds to be used for alternative loans to students in exchange for the University providing concessions or promises regarding providing the lender with (1) a specified number of loans; (2) a specified volume; or (3) a preferred lender arrangement.
- VII. Co-Branding
- a. The University 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 educational loans by that lender.
- VIII. Conflict of Interest

- a. No employee shall have a conflict of interest with respect to any education loan or other student financial aid for which the employee has responsibilities.
 - b. No employee may process any transaction related to his/her own personal financial aid eligibility or that of a relative.
- IX. Gifts
 - a. No employee may accept any gift from a lender, guarantor, or servicer of education loans.
 - b. Awards from professional associations that recognize professional milestones or extraordinary services to parents and student, or scholarships for conference attendance or other professional development opportunities, may be accepted.
- X. Prohibited Contracting Arrangements
 - a. No employee shall accept from any lender or affiliate of any lender any fee, payment, or other financial benefit 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.
- XI. Advisory Board Compensation
 - a. No employee who serves on an advisory board, commission, or a group established by a lender, guarantor, or a group of lenders or guarantors may receive anything of value from the lender, guarantor, or a group of lenders or guarantors in return for that service.
- XII. Policy Violations
 - a. Violations of this Policy may result in disciplinary action, up to and including dismissal.