

## Education Loan Code of Conduct

### **Introduction**

Any institution of higher education that participates in the federal student loan programs must publish and enforce a code of conduct that applies to all employees. Occidental College values the integrity of our institution and its people. This Code of Conduct is provided to all Office of Financial Aid staff and is published online.

The position you hold within Occidental College is evidence of the trust we have in our faculty and staff. Compliance with the spirit as well as the letter of all applicable laws, regulations, and Occidental College policies, and performance of our duties according to the highest standards of honesty and integrity is expected of all of us. This Code of Conduct applies to all officers and staff in the Office of Financial Aid and all officers and staff, directors or trustees who have any duties with respect to education loans ("Covered Employees"). If you violate any of the policies set forth in this Code of Conduct, you subject yourself to discipline, up to and including termination of your employment. Moreover, if you violate provisions of the Code of Conduct you also subject Occidental College to possible sanctions or liability. If you do not understand any provisions of the Code of Conduct or have any related questions you should always feel free to call on any of the resources listed in the section below titled Places for Assistance. If you observe violations or potential violations of this Code of Conduct you should also call on any of the resources listed in the Places for Assistance section.

### **Code of Conduct Provisions**

A Covered Employee of Occidental (the "School") acting in their role as a financial aid professional will:

1. Refrain from taking any action he or she believes is contrary to law, regulation, or the best interests of the students and parents they serve.
2. Ensure to the best of the employee's ability that the information they provide to students and parents is accurate, unbiased, and does not reflect any preference arising from actual or potential personal gain.
3. Disclose to the School any financial interest in or similar involvement with any non-School entity involved in any aspect of student financial aid at the School.
4. Be objective in advising the School regarding relationships with any entity involved in any aspect of the School's student financial aid administration.
5. Disclose to the School any instance of a lender, guaranty agency or loan servicer attempting to give a gift to you, or any family member or relative of yours, or any other individual who has a close relationship with you. For purposes of this section, "gift" means any gratuity, favor, discount, service,

entertainment, hospitality, loan, transportation, lodging, or meals, or other item that has monetary value

6. Except as described in this section, refrain from soliciting or accepting anything of value (including any gift as described above), whether provided in kind, by purchase of a ticket, payment in advance or reimbursement after the expense has been incurred, from any person or business involved in the education loan business, including lenders, servicers or guarantors. This prohibition on accepting gifts also applies to your family members, or any other person based on that person's relationship with you, if the gift is given with your knowledge and you have reason to believe that the gift was given because of your official position with the School. Notwithstanding the above, you may accept reimbursement of reasonable expenses related to service on an advisory body established by a lender or guarantor or a group of lenders and guarantors, and you may accept food, refreshments, training or informational material that are an important part of a training session that is designed to improve the service of a lender, guarantor or servicer of education loans to the School, if such training contributes to your professional development, all as approved in writing by the School's legal counsel.
7. Refrain from performing any consulting or other services for a lender or its affiliates in return for any fee, payment or other financial benefit.
8. Inform students they have the right and ability to select the lender of their choice regardless of whether that lender appears on the School's preferred lender list for federal or private education loans.
9. Not impede a student's right to select a particular lender.

#### **The School Will:**

1. Refrain from accepting anything of value (including any revenue or profit sharing) from any lender, guarantor or servicer of education loans, in exchange for recommending such entity or recommending the loan products of such entity. The School may accept permissible assistance provided by a lender in managing loan programs, including: (1) material, activities or programs on issues related to default aversion, default prevention, or financial literacy, such as a brochure, a workshop or on-site training; (2) entrance and exit counseling services, so long as the School's staff is in control of the counseling and the counseling does not promote the products and services of any specific lender; (3) philanthropic contributions from a lender, servicer or guarantor of education loans that are not made in exchange for any advantage related to education loans; (4) state education grants, scholarships, or financial aid funds administered by or on behalf of a state; (5) reimbursement of reasonable expenses for employee service on an advisory body and reimbursement for reasonable expenses related to employee participation in professional development activities; (6) professional development training for financial aid administrators; or (7) educational counseling materials, financial literacy materials, or debt

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management materials, provided that such materials contain the identification of any lender that assisted in preparing or providing such materials, all as approved in writing by the School's legal counsel.

2. Ensure to the best of its ability that employees of lenders do not identify themselves to School's students as employees of the School and that no employee of a lender works in or provides staffing to the School's Office of Financial Aid, with limited exceptions allowed under the law and approved in writing by the School's legal counsel.
3. Not assign, through packaging or other methods, a first-time borrower's loan to a particular lender or refuse to certify or unnecessarily delay certification of any loan based on a borrower's selection of a particular lender or guaranty agency.
4. Maintain any preferred lender list used by the School, including preferred lender lists for private education loans, in compliance with federal law.
5. Not request or accept funds to be used for private student loans, including a private education loan made by a lender that involves the payment by the School of points, premiums, additional interest or financial support to such lender in order for the lender to extend credit to a student or a student's family, in exchange for providing any concessions or promises regarding providing the lender with a specified number of loans to be made, insured or guaranteed under the federal loan program, a specified loan volume of such loans or a preferred lender arrangement for such loans.
6. Report annually to the Department of Education any reasonable expenses paid or provided to any employee who is employed in the Office of Financial Aid or who otherwise has responsibilities with respect to education loans or other financial aid. This report will contain: (1) the amount of each specific instance of reasonable expenses paid or provided; (2) the name of the employee or agent to whom the expenses were paid or provided; (3) the dates of the activity for which the expenses were paid or provided; and (4) a brief description of that activity.

### **Places to go for Assistance**

If you have a question regarding any policy contained in this Code of Conduct or you are aware of any actual or potential breach, you should contact the Occidental College General Counsel. If you feel that this person has not addressed your question or information appropriately or if the circumstances make it inappropriate **to discuss the matter with them, please contact the Occidental College President's Office.** To the maximum extent possible, the School will protect the confidentiality of persons who report possible breaches of this Code of Conduct on the part of other persons.