

# LOGAN UNIVERSITY

## Office of Financial Aid Code of Conduct

### **Introduction:**

The Financial Aid Office of Logan University has developed and implemented this Code of Conduct with respect to private education loans in compliance with the Higher Education Act, adhering to the Statements of Ethical Principles and Code of Conduct set forth by the National Association of Student Financial Aid Administrators (NASFAA), and in conjunction with the Logan College's Guidelines For Appropriate Conduct.

Expanded guidelines are available in [NASFAA's Statement of Ethical Principles and Code of Conduct for Institutional Financial Aid Professionals](#).

### **Purpose:**

The conduct of each member of our staff reflects on the University. The purpose of this Code of Conduct is to establish written guidelines that will enable us to provide financial aid to students in a manner that is free from conflict of interest, is in the best interest of students, and is in compliance with current laws and regulations.

The Financial Aid staff of Logan University strives for the highest standards of professional business principles and personal integrity at all times in order to reflect the University's commitment to excellence in education and standards of service.

### **Definitions:**

For the purpose of this policy, key terms are defined as follows:

A ***Private Education Loan*** is defined as any loan not made under Title IV of the Higher Education Act. The loan is issued to students for higher education expenses, and can refer to loans that are disbursed to the university, or directly to the student

The following are not considered private education loans, and are not covered by this code of conduct:

- A loan secured to cover education expenses through the following means:
  - o Residential mortgage transaction
  - o Reverse mortgage transaction
  - o Extension of credit under an open-end consumer credit plan (i.e., a home equity line of credit, or open line of credit tied to a Certificate of Deposit)
  - o Real property
  - o A dwelling

- An extension of credit in which this institution is the lender if the term of the extension of credit is 90 days or less, or an interest rate will not be applied to the credit balance and the term of the extension of credit is one year or less.

A **Lending Institution** is any entity that makes loans, guarantees or services to students, parents, or others for the purpose of financing the expenses of higher education.

An **Agent** is any employee of the university (Officers, trustees, and employees).

### **Personnel Affected:**

This code of conduct applies to all University staff working with financial aid, including administrators, faculty and student workers in the Financial Aid Office, whether on temporary, permanent, part-time or full-time basis.

### **Policy:**

Logan University:

- Does not require the use of a particular Lending Institution or in any way limit the choice of Lending Institution.
  - Processes loan applications through any Lending Institution a student or parent chooses.
  - Does not assign for any borrower, through the award packaging or other methods, a loan to a particular Lending Institution and does not refuse to certify or delay certification of any loan based on the borrower's selection of a particular Lending Institution.
  - Prohibits conflicts of interest with respect to loans.
  - Prohibits Revenue Sharing Arrangements with any Lending Institution.
  - Does not solicit or accept anything of value from any Lending Institution in exchange for any advantage sought by a Lending Institution to make educational loans to students enrolled at, or admitted to, the University.
  - Prohibits the solicitation or acceptance of any funds to be used for private educational loans in exchange for concession by the University to a Lending Institution.
  - Prohibits any employee of the Financial Aid Office, or any employee who otherwise has responsibilities with respect to educational loans, from soliciting or accepting from a Lending Institution any gift worth more than a nominal value.
  - Prohibits any employee of the Financial Aid Office, or any employee who otherwise has responsibilities with respect to educational loans, from entering into any type of consulting arrangement or other contract to provide to a Lending Institution services relating to educational loans.
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- Prohibits any employee of the Financial Aid Office, or any employee who otherwise has responsibilities with respect to educational loans, who serve on an advisory board (or

commission or group) relating to educational loans established by a Lending Institution or group of Lending Institutions from receiving anything of value from the Lending Institution or group of Lending Institutions in connection with serving on such an advisory board (or commission or group).

- Prohibits external Lending Institutions' employees, representatives, or agents from providing staffing services to the Financial Aid Office.
- Prohibits external Lending Institutions' employees, representatives, or agents from identifying themselves to students of Logan University or their parents as employees, representatives, or agents of the Financial Aid Office.

The staff of the Financial Aid Office at Logan University is bound by the following:

- Refrain from taking any action for his/her personal benefit.
- Refrain from taking any action he/she believes is contrary to law, Logan guidelines, policies and procedures, or the best interests of the students and parents our office serves.
- Ensure that the information he/she provides is accurate, unbiased, and does not reflect any preference arising from actual or potential personal gain.
- Be objective in making decisions and advising his/her institution regarding relationships with any entity involved in any aspect of student financial aid.
- Refrain from soliciting or accepting anything of other than nominal value from any entity (other than an institution of higher education or a government entity such as the U.S. Department of Education) involved in the making, holding, consolidating or processing of any student loans, including any of value (including reimbursement of expenses) for serving on an advisory body or as a part of a training activity of or sponsored by any such entity.
- Disclose to his/her institution, in such manner as his/her institution may prescribe, any involvement with or interest in any entity involved in any aspect of student financial aid.

**Gifts:**

No representative of Logan University employed in Financial Aid with private education loan responsibilities may solicit or accept any prohibited gift from a lending institution. Prohibited gifts include (but are not limited to): gratuity, favor, discount, entertainment (including expenses for shows, sporting events, or alcoholic beverages), hospitality (including private parties of select training or conference attendees), loan, or other item having a monetary value of any significance. This includes services, transportation, lodging, meals, etc. provided in kind, by purchase of a ticket, payment in advance, or reimbursement after expense has been incurred. Items of no significance include marketing or advertising items (i.e., pens, notepads, small tote bags, etc.).