

University of Northwestern Ohio Student Loan Code of Conduct

The University of Northwestern Ohio has adopted the following Student Loan Code of Conduct in accordance with HEA Sec 487(a)(25), 487(e), and 34 CFR 601.21 as an institution participating in loan programs. UNOH will provide students with the leading information allowing informative decisions free of conflict of interest. The code of conduct applies to students, employees, and all agents of the University. In relationship with lenders, servicers, and guarantors of loans the following code will be upheld.

- UNOH will not enter into any revenue-sharing arrangement with any lender. A revenue-sharing arrangement is an arrangement between a covered institution and a lender under which
 - a lender provides or issues a FFEL Program loan or private education loan to students attending the institution or to the families of such students; and
 - The institution recommends the lender or the loan products of the lender and in exchange, the lender pays a fee or provides other material benefits, including revenue or profit sharing, to the institution.
- No officer or employee within the UNOH Financial Aid Department or any other employee with responsibilities in education loans (FFEL or Private) shall solicit or accept any gift from a lender, guarantor, or servicer of education loans.
 - Gifts can include any gratuity, favor, discount, entertainment, hospitality, loan, or other item having a monetary value of more than a de minimus amount. Also included are gifts 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.
 - Gifts to family members of a UNOH officer, employee, or agent shall be considered a gift to the officer, employee, or agent if:
 - The gift is given with the knowledge and consent of the officer, employee, or agent; and
 - The officer, employee, or agent has reason to believe the gift was given because of the official position of the officer, employee, or agent.
- No officer or employee within the UNOH Financial Aid Department or any other employee with responsibilities in education loans shall accept from any lender or affiliate of any lender any fee, payment, or other financial benefit (including the opportunity to purchase stock) 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.
- UNOH will not, for any first-time borrower, assign a loan to a particular lender on a student's financial aid offer via packaging. UNOH will not refuse to certify, or delay certification of any loan based on the borrower's selection of a particular lender or guaranty agency.
- UNOH will not request or accept from any lender any offer of funds to be used for private education loans (as defined in section 140 of the Truth in Lending Act), including funds for an opportunity pool loan, to students in exchange for the institution providing concessions or promises regarding providing the lender with:
 - A specified number of loans made, insured, or guaranteed
 - A specific loan volume
 - A preferred lender arrangement for such loans
- UNOH shall not request or accept from any lender any assistance with call center staffing or financial aid office staffing. Permitted assistance includes:
 - Professional development or training for FAAs

- Providing educational counseling materials, financial literacy materials, or debt management materials so long as the lender providing the information is disclosed to the borrower.
- Staffing services on a short-term, non-recurring basis to assist the institution with financial aid related functions during emergencies, including state or federally declared natural disasters.
- An officer or employee within the UNOH Financial Aid Department or any other employee with responsibilities in education loans or other financial aid of the institution, and who serves on an advisory board, commission, or group established by a lender, guarantor, or group of lenders or guarantors, shall be prohibited from receiving anything of value from the lender, guarantor, or group of lenders or guarantors, except that the employee may be reimbursed for reasonable expenses incurred in serving on such advisory board, commission, or group.