

Student Loan Code of Conduct

As a part of the Program Participation Agreement for participating in Title IV financial aid programs, institutions are required to develop and comply with a loan code of conduct that prohibits conflicts of interest for financial aid personnel with respect to all student loans. Any Claremont Lincoln University financial aid officer or employee who has responsibilities with respect to student educational loans must annually be reminded to comply with this code of conduct. The following provisions bring Claremont Lincoln University into compliance with the federal law [CFR 34 601.21 and HEOA 487]

1. Revenue-Sharing Prohibition

Neither Claremont Lincoln University as an institution nor any individual financial aid officer or financial aid employee shall enter into any revenue-sharing arrangement with any lender which makes loans to students attending the institution.

2. Gift Prohibitions

No financial aid officer, or financial aid employee of Claremont Lincoln University who has responsibilities with respect to education loans, or any of their family members, shall solicit or accept any gift from a lender, guarantor, or servicer of education loans.

- a. For purposes of this prohibition, the term "gift" means any gratuity, favor, discount, entertainment, hospitality, loan or other item having a monetary value of more than a nominal value (defined here to be any item of value in excess of \$25).

3. Contracting Arrangements

A financial aid office or employee at Claremont Lincoln University who has responsibilities with respect to education loans shall not 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

4. Preferred Lender Guidelines

Claremont Lincoln University shall not:

- assign a lender to a first-time borrower through award packaging or any other method; or

- refuse to certify or delay certification of any loan based on the borrower's selection of a particular lender or guaranty agency.
- request or accept from any lender any offer of funds to be used for private education loans, including funds for an opportunity pool loan, to students in exchange for the institution providing concessions or promises regarding providing the lender with:
 - a specific loan volume of such loans; or
 - a preferred lender arrangement for such loans.
 - an "opportunity pool loan" is defined as a private education loan made by a lender to a student (or the student's family) that involves a payment by the institution to the lender for extending credit to the student

5. Call Center & Staffing

Claremont Lincoln University shall not request or accept from any lender any assistance with call center staffing or financial aid office staffing

6. Advisory Board Compensation

Any financial aid office employee who has any responsibilities with respect to education loans or other student financial aid, 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 an advisory board, commission, or group.

