



**AUBURN UNIVERSITY  
AT MONTGOMERY**

## **Institutional Code of Conduct for Education Loans**

Auburn University at Montgomery participates in the William D. Ford Federal Direct Loan Program which includes the Direct Subsidized and Direct Unsubsidized Student Loans, the Direct Graduate PLUS Loans, and the Direct Parent PLUS Loans. In some cases, Private Student Loans are needed to supplement the cost of education. Auburn University at Montgomery recommends that students exhaust all other methods of financing their education before applying for Private loans. To comply with the 2008 Higher Education Opportunity Act (enacted August 14, 2008) Auburn University at Montgomery adopts the following Institutional Code of Conduct for Education Loans to serve as the formal guiding principles in insuring the integrity of the student aid process and ethical conduct of Auburn University at Montgomery employees in regard to student loan practices.

### **Revenue Sharing**

The term “revenue-sharing arrangement” means an arrangement between an institution and a lender which – (i) a lender provides or issues a loan that is made, insured, or guaranteed to students under the Higher Education Act attending the institution or to the families of such students; and (ii) 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, an officer or employee of the institution. Auburn University at Montgomery and its employees will not enter into any type of revenue-sharing arrangement with any lender, guarantor or servicer. Auburn University at Montgomery does not provide students a preferred lender list from which to select a lender for a private student loan. All loans are processed without regard to lender or mode of transmission (i.e., electronic or paper). Auburn University at Montgomery will neither recommend a private loan lender nor accept material benefits including revenue or profit sharing to the institution, an officer, or an employee of the institution or an agent.

### **Gifts**

Employees of the Financial Aid Office are prohibited from soliciting or accepting any gift from a lender, guarantor, or servicer of education loans.

- Gifts include any gratuity, favor, discount, entertainment, hospitality, loan or other item. This 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 incurred.

- Gifts to family members of an Auburn University at Montgomery employee are considered to be a gift to the employee if the gift is given with the knowledge and consent of the employee and there is reason to believe the gift was given because of the official position of that employee.

### **Contracting Arrangements**

Employees of the Financial Aid Office shall not accept from any lender or affiliate of any lender any fee, payment, or other financial benefit (including opportunity to purchase stock) as compensation for any consulting arrangement or other contract to provide services to a lender or on behalf of a lender relating to education loans.

### **Preferred Lender Status**

Auburn University at Montgomery participates in the William D. Ford Federal Direct Loan Program which provides student and parent loans through the U.S. Department of Education. Lenders in the private student loan industry will not be given a preferred status. Auburn University at Montgomery will not produce a preferred lender list that gives any lender an advantage in securing business from Auburn University at Montgomery students.

### **Private Loan Certification**

Auburn University at Montgomery will not assign a borrower's private student loan to a particular lender; all decisions will be made by the borrower in his/her independent review of borrower benefits and lender services. Auburn University at Montgomery will not refuse to certify, or delay certification of, any loan based on the borrower's selection of a particular lender or guaranty agency.

### **Opportunity Pool Loan**

Auburn University at Montgomery will not request or accept from any lender any offer of funds to be used for private education loans (defined in section 140 of the Truth in Lending Act) including funds for an opportunity pool loan in exchange for Auburn University at Montgomery providing concessions or promises regarding providing the lender with a specified number of loans made, insured or guaranteed; a specified loan volume of such loans; or a preferred lender arrangement for such loans.

### **Staffing Assistance**

Auburn University at Montgomery will not request or accept from any lender, guarantor, or servicer of student loans any assistance with call center staffing or financial aid office staffing.

### **Advisory Board Compensation**

Employees of the Financial Aid Office who serve on an advisory board, commission, or group established by a lender, guarantor, or group of lenders or guarantors, are 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.