

## ECU Office of Student Financial Aid Code of Conduct

In compliance with the Higher Education Opportunity Act (HEOA) of 2008, the following Code of Conduct was written in respect to the Title IV Stafford Loan program. Financial Aid employees are held to the following standards:

1. Prohibited from conflicts of interest in respect to loans.
2. Prohibited from revenue sharing arrangements with any lender.
3. Prohibited from the soliciting or accepting of gifts from a lender, guarantor, or servicer. Gifts include any “gratuity, favor, discount, entertainment, hospitality, loan, or other item that have a monetary value of more than a de minimus amount,” including services, transportation, lodging, and meals. A gift does not include the following:
  - standard materials, activities, or programs related to a loan being provided
  - food, refreshments, training, or informational materials provided as part of a training session conducted by the lender for the institution to improve services
  - favorable terms, conditions, or borrower benefits provided to a student employed by the institution if comparable terms are provided to all students of the institution
  - Entrance and Exit counseling services provided to borrowers if a covered institution’s staff is in control of the counseling and the counseling does not promote one specific lender
  - philanthropic contributions to an institution unrelated to education loans
  - state education grants, scholarships, or financial aid funds
4. Prohibited from receipt of any fees, payments, or other financial benefits for consulting services by anyone with responsibilities in respect to education loans.
5. Prohibited from assigning first-time borrower’s loan to a particular lender and requires the institution to certify and not delay certification of any loan regardless of the lender or guaranty agency the borrower selects.
6. Prohibited from accepting any funds to be used for private education loans in exchange for the institution providing concessions to the private lender.

In general, ECU is held to the following standards:

1. Prohibited from accepting assistance with call center staffing or Financial Aid Office staffing from any lender. ECU may accept professional development training for its Financial Aid administrators, counseling, financial literacy, and debt management materials from lenders as well as short-term, non-recurring staffing assistance during an emergency.
2. Any employee with responsibilities in respect to financial assistance at ECU who serves on an advisory board or commission of a lender or guarantor may not accept anything of value from the lender or guarantor except reimbursement for the reasonable expenses for serving the board or commission.