



## STUDENT LOAN CODE OF CONDUCT

Beckfield College supports and complies with the Higher Education Opportunity Act's (HEOA) provisions regarding the Code of Conduct required to be adopted and enforced by institutions participating in the Title IV loan program. All Beckfield College employees with responsibilities for the administration of student educational loans are informed annually of the provisions of the Student Loan Code of Conduct.

### Student Loan Code of Conduct Purpose

Beckfield College recognizes that ensuring the integrity of the student financial aid process is critical to providing fair and affordable access to higher education. Therefore, the College has formalized the following guiding principles that shall be effective immediately. These guidelines are designed to avoid any potential for a conflict of interest between the College and its students, or their parents, in the student financial aid process. For purposes of this Code of Conduct, a "Lending institution" is any entity (other than an institution of higher education or a governmental entity such as the U.S., the Kentucky or Ohio Department of Education) involved in the making, holding, consolidating or processing of any student loans.

### Policy

1. Beckfield College employees shall receive no personal benefit.
  - a. No employee or officer of Beckfield College shall accept or solicit anything of more than nominal value on his or her behalf or on behalf of another person or entity from any Lending institution.
  - b. Specifically, no employee or officer of Beckfield College shall accept or solicit, from any Lending Institution:
    - i. Payment for entertainment expenses or any lodging, rental, transportation or other gratuities related to lender-sponsored activities;
    - ii. Payments for registration, transportation or lodging at lender-sponsored conferences and trainings; and
    - iii. Solicitations or invitations to serve on lender advisory boards and/or payments related to such service.
  - c. Additionally, Beckfield College employees and officers shall not accept or solicit, from any student loan guarantee agency:
    - i. Payments for expenses or any lodging, rental transportation or other gratuities related to activities sponsored by the guarantee agency.
2. Beckfield College employees shall not serve on lender advisory board for remuneration.
  - a. No officer or employee of the College who makes financial aid decisions for the College or who is employed in, supervises or otherwise has responsibility or authority over the College's financial aid office shall receive any remuneration for consulting services and/or serving as a member or participant of a student loan advisory board of a Lending Institution or any reimbursement of expenses for such service.
  - b. Any officer or employee of the College who serves as a member or participant of a Lending Institution's board shall recuse himself or herself from any board discussions regarding the College's financial aid operations.

3. Beckfield College shall not provide any advantage to a Lending Institution.
  - a. The College shall not accept anything of value from any Lending Institution in exchange for any advantage or consideration provided to the Lending Institution related to its student loan activities, including but not limited to revenue-sharing, printing costs or below-cost computer hardware or software.
  - b. Also, the College shall not allow any Lending Institution to:
    - i. staff the College's financial aid office at any time; or
    - ii. communicate with the College's students or their parents in such a manner as to create the impression that the Lending Institution is an employee or agent of Beckfield College in connection with the College's student financial aid operations, including through the use of mascots, logos, and other marks.
  - c. Finally, the College shall not enter into any agreement with a Lending Institution to provide alternative (i.e., private, non-federal or "opportunity") student loan programs if the provision of such alternative loan programs prejudices other students or parents, or if the acceptance of such funds by the College is conditioned on the College providing concessions to the Lending Institution.
  
4. Beckfield College shall make appropriate use of any Preferred Lender Lists.
  - a. If the College decides to promulgate a list or lists of preferred or recommended lenders for student loans or similar ranking or designation (Preferred Lender List), the selection of Lending Institutions for inclusion on the Preferred Lender List shall be based on the best interests of the College's students and their parents without regard to the financial interests of the College. In addition, any Preferred Lender List shall clearly indicate:
    - That students and their parents are not required to use any of the "preferred lenders";
    - Where to find information on their Lending Institutions for student loans;
    - That the College will promptly certify any loan from any Lending Institution selected by a borrower, in accordance with U.S. Department of Education regulations;
    - The process the College utilized to select "preferred lenders", including but not limited to the criteria used and the relative importance of such criteria.

Beckfield College shall review any Preferred Lender List on an annual basis to determine that the information appearing on the list is accurate and that any website links are still available.

**Beckfield College**

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