



## Code of Conduct

The 2008 Higher Education Opportunity Act (HEOA) conditions the eligibility of educational institutions to participate in Title IV programs on the development, advertisement and administration of and compliance with a code of conduct prohibiting conflicts of interest for its financial aid personnel [HEOA § 487(a)(25)]. Southwestern College's officers, employees and agents are required to comply with this code of conduct. The following specific provisions bring Southwestern College into compliance with the federal law [HEOA § 487(e)].

1. Neither Southwestern College as an institution nor any individual officer, employee or agent shall enter into any revenue-sharing arrangements with any lender. The HEOA defines a "revenue-sharing arrangement" as any arrangement between an institution and a lender under which the lender makes Title IV loans to students attending the institution (or to the families of those students), 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 or to its officers, employees, or agents.
2. No officer or employee of Southwestern College who is employed in the financial aid office or who otherwise has responsibilities with respect to education loans, or agent 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. 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 de minimus amount. A gift does not include (1) a brochure, workshop, or training using standard materials relating to a loan, default aversion, or financial literacy; (2) food, training, or informational material provided as part of a training session designed to improve the service of a lender, guarantor, or servicer if the training contributes to the professional development of the institution's officer, employee or agent; (3) favorable terms and benefits on an education loan provided to a student employed by the institution if those terms and benefits are comparable to those provided to all students at the institution; (4) entrance and exit counseling as long as the institution's staff are in control of the counseling and the counseling does not promote the services of a specific lender; (5) philanthropic contributions from a lender, guarantor, or servicer that are unrelated to education loans or any contribution that is not made in exchange for advantage related to education loans, and; (6) State education grants, scholarships, or financial aid funds administered by or on behalf of a State.
3. An officer or employee of Southwestern College who is employed in the financial aid office or who otherwise has responsibilities with respect to education loans, or an agent 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. Southwestern College shall not:
  - a. for any first-time borrower, assign, through award packaging or other methods, the borrower's loan to a particular lender; or
  - b. refuse to certify, or delay certification of, any loan based on the borrower's selection of a particular lender or guaranty agency.
5. Southwestern College shall not 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. a specified number of loans made, insured, or guaranteed under Title IV;
  - b. a specified loan volume of such loans; or
  - c. a preferred lender arrangement for such loans.
6. Southwestern College shall not request or accept from any lender any assistance with call center staffing or financial aid office staffing, except that a lender may provide professional development training, educational counseling materials (as long as the materials identify the lender that assisted in preparing the materials), or staffing services on a short-term, nonrecurring basis during emergencies or disasters.
7. Any employee who is employed in the financial aid office, or who otherwise has 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 advisory board, commission, or group.