

## Shorter College Student Loan Code of Conduct

### Purpose

Shorter College and the financial aid office's primary goal is to assist all students in achievement of their academic successes by providing suitable financial aid resources. Shorter College staff shall maintain integrity and conduct themselves in an ethical and professional manner, in accordance with the "Shorter College Staff Handbook" and other requirements set forth in this policy.

### *Ethical Principles*

#### 1. Ban on Revenue-Sharing

The term "Revenue-sharing arrangement" means an arrangement between an institution and a lender under which the lender participates in Title IV lending to students attending the institution or to family members of the 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. Shorter College and its staff will not enter in to any type of revenue-sharing arrangement with any lender, guarantor, or servicer.

#### 2. Ban on Receiving Gifts

Financial aid employees or any other Shorter College staff member that may have any responsibility with respect to educational loans may not accept or solicit gifts from any lender, servicer, or guarantor. A "gift" is defined as any gratuity, favor, discount, entertainment, hospitality or any other item with monetary value. Gifts to family members of Shorter College staff will be considered as a gift to the employee if the gift was given as a result of the position of that employee.

#### 3. Ban on Contracting Arrangements

Financial aid employees or any other Shorter College staff member that may have any responsibility with respect to educational loans may not accept from a lender, or lender affiliate, any type of fee, payment, or other financial benefit as compensation for consulting or other services proved on behalf of the lender relating to educational loans.

#### 4. Prohibition of Steering Borrowers

Shorter College will not assign a borrower's loan to a particular lender; all decisions will be made by the borrower. In addition, we will not refuse to certify, or delay certification of any loan based on the borrower's selection of a particular lender or guarantor.

#### 5. Prohibition on Offers of Funds for Private Loans

Shorter College will not request or accept any type of funds from lenders to be used for private education loans, including funds for an opportunity pool loan, to students in exchange for providing

concessions or promises to the lender for a specific number of Title IV loans made, insured, or guaranteed, a specific loan volume, or a preferred lender arrangement.

#### 6. Ban on Staffing Assistance

Shorter College will not request or accept from any lender any assistance with staffing of any kind, except for development training, educational counseling materials, or short-term staffing services on a nonrecurring basis during times of emergencies.

#### 7. Ban on Advisory Board Compensation

Financial aid employees or any other Shorter College staff member that may have any responsibility with respect to educational loans who serves on an advisory board, commission, or group established by a lender or guarantor is prohibited from receiving anything of value from the lender, guarantor, or group, except the employee may be reimbursed for reasonable expenses incurred while serving on such advisory board, commission, or group.

Revised 2/12/09