DIVISION OF ENROLLMENT
Financial Aid & Scholarships

UNIVERSITY OF NORTH TEXAS
CODE OF CONDUCT FOR FINANCIAL AID PROFESSIONALS

In order to prevent any conflicts of interest in the administration of programs for Federal Student Assistance, the University of North Texas ("UNT") has adopted a Code of Conduct for Financial Aid Professionals. The Code of Conduct specifically applies to:

- All officers or employees of the University of North Texas who are employed in Financial Aid & Scholarships.
- All officers or employees of the University of North Texas who otherwise have responsibilities with respect to educational loans; and
- All agents of the University of North Texas who have responsibilities with respect to educational loans.

Individuals who are subject to this Code of Conduct (hereinafter "officers, employees, and agents") must conduct themselves in accordance with the UNT Ethics Policy (04.027) and the standards set out below:

1. **Gifts**. No officer, employee, or agent shall solicit or accept any gift from a lender, guarantor, or servicer of educational loans.

   a. "Gifts" include:

      i. Any gratuity, favor, discount, entertainment, hospitality, loan, or other item in excess of $50, including all cash or negotiable instruments.

      ii. Any gift of service, transportation, lodging, or meals, whether provided in kind, by purchase of a ticket, payment in advance, or reimbursement after the expense has been incurred.

      iii. Any gifts to family members or any other individual based on the individual's relationship with the officer, employee or agent if: (i) the gift was given with the knowledge and acquiescence of the officer, employee or agent and (ii) the officer, employee or agent had reason to believe the gift was given because of her or his official position.

   b. "Gifts" do not include:

      i. Standard material, activities, or programs related to a loan, default aversion, default prevention, or financial literacy, such as a brochure, a workshop, or training.

      ii. Food, refreshments, training, or informational material furnished to an officer, employee or agent, as an integral part of a training session that is designed to improve the service of a lender, guarantor, or servicer of education loans to UNT, if such training contributes to the professional development of the officer, employee, or agent.

      iii. Favorable terms, conditions, and borrower benefits on an education loan provided to a student employed by UNT if such terms, conditions, or benefits

are comparable to those provided to all students of UNT.

iv. Entrance and exit counseling services provided to borrowers to meet UNT's responsibilities for entrance and exit counseling as long as UNT's staff is in control of the counseling and specific lender's products and services are not promoted.

v. Philanthropic contributions to UNT from a lender, servicer, or guarantor of education loans that are unrelated to education loans or any contribution from any lender, guarantor, or servicer that is not made in exchange for any advantage related to education loans.

vi. State education grants, scholarships, or financial aid funds administered by or on behalf of a state.

2. **Stock Ownership**. A person employed by the University of North Texas in Financial Aid & Scholarships may not own stock or hold another ownership interest in a student loan lender, other than through ownership of shares in a publicly traded mutual fund or similar investment vehicle in which the person does not exercise any discretion regarding the investment of the assets of the fund or other investment vehicle. For the purposes of this section, a "student loan lender" means a person whose primary business is: (a) making, brokering, arranging, or accepting applications for student loans; or (b) a combination of activities described in subsection (a).

3. **Contracting Agreements**. No officer, employee, or agent shall 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. This provision does not prohibit:

a. an officer or employee who is not employed by UNT Financial Aid & Scholarships and who does not otherwise have responsibility with respect to educational loans or an agent who does not have responsibility with respect to educational loans from performing paid or unpaid service on a board of a lender, guarantor or servicer of education loans as may be consistent with other university policy.

b. an officer or employee who is not employed by UNT Financial Aid & Scholarships but who has responsibility with respect to educational loans as a result of a position held at the institution, or an agent who has responsibility with respect to educational loans, from performing paid or unpaid service on a board of directors of a lender, guarantor, or servicer of education loans, in accordance with university ethics and dual employment policies.

c. an officer, employee, or contractor of a lender, guarantor, or servicer of education loans from serving on the Board of Regents, consistent with Regents Rules relating to Board Ethics and Standards of Conduct.

4. **Advisory Board Compensation**. No officer, employee, or agent who serves on an advisory board, commission, or group established by a lender, guarantor, or group of lenders or guarantors shall receive anything of value from the lender, guarantor or group of guarantors other than the reimbursement of reasonable expenses incurred in service to such an advisory board, commission or group.

5. **Incentive Compensation.** No officer, employee, or agent shall receive any commission, bonus, or other incentive payment based directly or indirectly on success in securing enrollments or financial aid to any persons or entities engaged in any student recruiting or admission activities or in making decisions regarding the award of student financial assistance.

In addition, officers, employees, or agents of the University of North Texas may not enter into or engage in the following:

1. revenue-sharing arrangements with any lender.

2. assign any first-time borrower's loan, through award packaging or other method, to a particular lender or refuse to certify or delay certification of any loan based on the borrower's selection of a particular lender or guarantee agency.

3. 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 university providing concessions or promises regarding providing the lender with:

   a. a specified number of loans made, insured, or guaranteed; or,

   b. a specified loan volume; or,

   c. a preferred lender arrangement.

4. request or accept from any lender any assistance with call center staff or financial aid office staffing, except in regard to:

   a. professional development training for financial aid administrators;

   b. providing educational counseling materials, financial literacy materials, or debt management materials to borrowers, provided that the materials disclose to borrowers the identification of any lender that assisted in preparing or providing such materials; or

   c. staffing services on a short-term, non-recurring basis to assist the institution with financial aid-related functions during emergencies.

In addition to the above statements, all financial aid staff members have received a copy of NASFAA's *Statement of Ethical Principles* and *Code of Conduct for Institutional Financial Aid Professionals* and have agreed to abide by them.