

## **Hampton University's Office of Financial Aid Code of Conduct**

The Higher Education Opportunity Act (HEOA) of 2008 requires institutions of higher education to develop and enforce a code of conduct that prohibits conflicts of interest for financial aid personnel. In compliance with this requirement, Hampton University has created the following code of conduct based on the HEOA of 2008.

Other College employees, officers, and agents with responsibilities in respect to education loans also have to comply with this policy.

### **Code of Conduct**

#### Conflict of Interest

No employee shall have a conflict of interest with respect to any educational loan or other student financial aid for which the employee has responsibility. The University shall treat every scholar, parent, loan approval, and inquiry with equal consideration. Provide information and services that do not discriminate on the basis of race, gender, ethnicity, sexual orientation, religion, disability, age, or economic status.

#### Ban on Revenue-Sharing Arrangements

The University shall not enter into any revenue-sharing arrangement with any lender or other vendor working with any of its financial aid offices. The University shall not accept any fee or other material benefit in exchange for recommending a lender to its students.

#### Gift Ban

It is strictly prohibited that any University officer or employee with financial aid responsibilities shall solicit or accept a gift (e.g., a gift of services, transportation, lodging, or meals, provided by purchase of a ticket, payment in advance, or reimbursement) having a monetary value of more than a de minimus amount from a lender, guarantor, or servicer of education loans.

#### Contracting Arrangements Prohibited

No University officer or employee with financial aid responsibilities shall accept from any lender or lender affiliate any payment or other financial benefit as compensation for any type of consulting arrangement or other contract to provide services to a lender.

#### Interaction with Borrowers

The University shall not automatically assign a particular lender to any borrower, and shall not refuse to certify or delay certification of any loan based on the lender or guarantee agency selected.

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

The University shall not request or accept from any lender an offer of funds to be used for private educational loans in exchange for the University providing the lender with a specified number or volume of federal loans made or in exchange for placement on a preferred lender list.

#### Co-branding

The University will not authorize any co-branding with any individual lender or any affiliations that imply endorsement of private education loans by that lender.

#### Ban on Staffing Assistance

The University shall not request or accept from any lender any assistance with call center staffing or financial aid office staffing. Lenders, however, may provide professional development training to financial aid administrators, educational advising materials to borrowers, or assistance in state or federally-declared natural disasters.