PURPOSE

The purpose of this policy is to establish a code of conduct that prohibits a conflict of interest with the responsibilities of an agent of the school with respect to any loan made under the William D. Ford Federal Direct Loan Program or private education loans.

SCOPE

The scope of this policy applies to all Employees.

POLICY

The code of conduct requirements are set forth in the Higher Education Opportunity Act (HEOA). All Northwestern Health Sciences University (NWHSU) employees are required to comply with this code of conduct.

1. No employee shall accept a gift, gratuity, favor, discount, entertainment, hospitality, loan, or other item having a monetary value of more than $25 from a lender, guarantor, or servicer of education loans.
2. NWHSU will not accept philanthropic contributions from a lender, lender servicer, or guarantor that are related to the educational loans provided by the lender, servicer, or guarantor to NWHSU or that are made in exchange for any advantage related to education loans.
3. Any employee who serves on an advisory board, commission, group established by a lender, guarantor, or group of lenders shall be prohibited from receiving anything of value for their service except reimbursement for reasonable expenses incurred in serving on such advisory board, commission, or group.
4. No employee shall receive compensation for any type of consulting arrangement or other contract to provide services to a lender. Additionally, NWHSU employees may not solicit or accept a fee, revenue or profit sharing or other materials in exchange for NWHSU recommending a lender or its products.
5. There will be no award packaging or other methods to assign borrower’s loan to a particular lender. There will also be no refusal or delay in certification of any loan based on the borrower’s selection of lender or guaranty agency.
6. No employee shall request or accept any incentives from lenders in exchange for promise of lender use or loan volume.
7. NWHSU will not accept offers for assistance with staffing from any lender.
Northwestern Health Sciences University

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DEFINITIONS

Northwestern Health Sciences University adheres to the National Association of Student Financial Aid Administrator’s on Ethical Principles.

PROCEDURE

All agents with responsibility for loans must be informed annually of the provisions of the code.

Policy Cross Reference
Conflict of Interest