

Code of Conduct



Cedarville University (CU) has adopted the following code of conduct (in accordance with the Higher Education Opportunity Act (H.R. 4137)) as signed into law on August 14, 2008. This applies to the officers, employees, and agents of the institution and is inclusive of the following:

- a ban on revenue-sharing arrangements with any lender. The HEOA defines “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;
- a ban on employees of the CU financial aid office receiving gifts from a lender, guaranty agency or loan servicer. No officer or employee of the CU financial aid office (or an employee or agent who otherwise has responsibilities with respect to educational loans) may solicit or accept any gift from a lender, guarantor, or servicer of education loans. A “gift” is defined as any gratuity, favor, discount, entertainment, hospitality, loan, or other item having monetary value of more than a *de minimus* amount.

However, a gift does not include (1) standard material, activities or programs on issues relating to a loan, default aversion, or financial literacy, such as a brochure, workshop or training; (2) food, refreshments, 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 services provided to borrowers 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 any advantage related to education loans, and; (6) State education grants, scholarships, or financial aid funds administered by or on behalf of a State;

- a ban on contracting arrangements. No officer or employee of CU who is employed in the financial aid office (or an employee or agent who otherwise has responsibilities with respect to education loans) may accept from a lender, or an affiliate of any lender, any fee, payment, or other financial benefit as compensation for any type of consulting arrangement or contract to provide services to or on behalf of a lender relating to education loans;
- a prohibition against steering borrowers to particular lenders or delaying loan certifications. For any first-time borrower, CU does not assign, through the award packaging or other methods, the borrower’s loan to a particular lender. In addition, CU will not refuse to certify, or delay the certification, of any loan based on the borrower’s selection of a particular lender or guaranty agency;

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- a prohibition on offers of funds for private loans. CU will not request or accept from any lender any offer of funds for private 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 specified loan volume, or a preferred lender arrangement. An “opportunity pool loan” is defined as a private education loan made by a lender to a student (or the student’s family) that involves a payment by the institution to the lender for extending credit to the student;
- a ban on staffing assistance. CU will not request or accept from any lender any assistance with call center staffing or financial aid office staffing. However, 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; and
- a ban on advisory board compensation. An employee of the CU financial aid office (or employee who otherwise has responsibilities with respect to education loans or financial aid) who serves on an advisory board, commission, or group established by a lender or guarantor (or a group of lenders or guarantors) is prohibited from receiving anything of value from the lender, guarantor, or group, except for reimbursement for reasonable expenses incurred by the employee for serving on the board.
- No action will be taken by financial aid staff that is for their personal benefit or could be perceived to be a conflict of interest.
 - Employees within the financial aid office will not award aid to themselves or their immediate family members. Staff will reserve this task to institutionally designated personnel, to avoid the appearance of a conflict of interest.
 - A borrower's choice of a lender will not be denied, impeded, or unnecessarily delayed by the institution, even if that lender is not included on the institution's preferred lender list.
 - No amount of cash, gift, or benefit in excess of a de minimis amount shall be accepted by a financial aid staff member from any financial aid applicant (or his/her family), or from any entity doing business with or seeking to do business with the institution (including service on advisory committees or boards beyond reimbursement for reasonable expenses directly associated with such service).
- Information provided by the financial aid office is accurate, unbiased, and does not reflect preference arising from actual or potential personal gain.
- Institutional financial aid offers and/or other institutionally provided materials shall include the following:
 - Breakdown of estimated individual [Cost of Attendance](#) components, including which are [direct](#) (billed by the institution) costs vs. [indirect](#) (not billed by the institution) costs
 - Clear identification and proper grouping of each type of aid offered indicating whether the aid is a [grant/scholarship](#), [loan](#), or [work program](#)
 - Estimated [net price](#)

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- Standard terminology and definitions, using NASFAA's [glossary of terms](#)
- Renewal requirements for each aid type being offered as well as next steps and financial aid office contact information

- Financial aid professionals will disclose to their institution any involvement, interest in, or potential conflict of interest with any entity with which the institution has a business relationship.