

## Berkeley College Code of Conduct for Financial Aid Professionals

Various federal and state laws require institutions of higher education that participate in certain student loan programs to maintain and prominently display a code of conduct governing the activities of their associates and of private lending institutions involved in such programs.

Berkeley College requires its associates to observe the highest standards of ethics, professionalism, and service in carrying out their administrative responsibilities to the College and its students. This Code of Conduct, which constitutes the policy of the College, embodies those standards.

**Duties of Berkeley College Financial Aid Professionals.** The College requires associates involved in the financial aid process to act (a) in compliance with all applicable laws and regulations, and (b) in the best interests of students and prospective students. At all times, those associates are expected to provide accurate and unbiased information and offer their services to students and prospective students in a non-discriminatory manner. Furthermore, they are required to promptly disclose any potential conflicts of interest, and to report to appropriate College officials any violations or attempted violations of this Code by either associates or lending institutions.

**Prohibited Conduct.** The College and its associates, including associates' family members, shall not

1. Enter into any revenue-sharing or other arrangement by which the College obtains a financial benefit from a lending institution, loan servicer, or guarantor (collectively, "Lending Institution") in connection with student loans;
2. Solicit or accept any form of compensation of more than nominal value (\$25), including fees, gifts, loans, services, computer hardware or printing services at below market cost, entertainment, hospitality, travel or lodging expenses, or other benefits from a Lending Institution in connection with the processing of student loans;<sup>1</sup>
3. Recommend, require the use of, or assign loans to any specific external lender; refuse to process a loan involving a lender selected by a student; or maintain a preferred lender list that does not comply with the Department of Education's requirements;
4. Maintain an employment or consulting arrangement with a Lending Institution, or receive anything of value for serving on an advisory board or board of directors of such Lending Institution;<sup>2</sup>
5. Permit an employee of a Lending Institution to (a) staff the College financial aid office, admissions office, or call center; or (b) represent herself/himself as an associate or representative of the College;<sup>3</sup> or
6. Permit a Lending Institution to use College logos or trademarks in the marketing of loans or services to students, prospective students, or parents in a way that suggests sponsorship by the College.
7. Entrance counseling required by the Department of Education must be completed by the student without any assistance from Berkeley or a representative of Berkeley. Examples of improper assistance include providing answers to students completing the module(s), clicking buttons for them, or encouraging students to complete the entrance counseling at a faster pace. Violation of this provision may expose the employee to employment discipline.

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<sup>1</sup> This provision shall not prohibit acceptance of (a) counseling services provided to borrowers, so long as the College controls such counseling; the counseling does not promote the products of a specific Lending Institution; and the Lending Institution personnel conducting the counseling do not represent themselves as associates of the College; or (b) standard educational materials, activities, training, or other programs related to default prevention or financial literacy, as long as the identity of the Lending Institution that prepared the materials is disclosed; or (c) reasonable food and refreshments provided as an integral part of such programs or activities, or in connection with a reception given by a Lending Institution that is held in conjunction with a professional conference and is open to all conference attendees.

<sup>2</sup> This provision shall not prohibit an associate who is not involved in, is not responsible for, and does not benefit from the financial aid process from receiving compensation for serving on (a) the Board of Directors of a publicly traded or privately held company, or (b) an advisory board unrelated to educational loans; provided that any such relationship between an associate and a lending institution must be disclosed to the College promptly and in writing.

<sup>3</sup>This provision shall not prohibit the College from requesting or accepting assistance from a lending institution related to training for financial aid administrators.