



Code of Conduct for Education Loans As active institutional members of the National Association of Student Financial Aid Administrators (NASFAA), the Financial Aid employees at Thomas University have historically prescribed to the NASFAA Code of Conduct. The Code is intended to help guide Financial Aid Administrator in carrying out their obligations, particularly with regard to ensuring transparency in the administration of the student financial aid programs, and to avoid the harm that may arise from actual, potential, or perceived conflict of interest. This code does not replace the provisions outlined in the University's Conflict of Interest Policy (AM 02.A.09) applicable to all employees, but rather expands on this policy as it specifically related to Title IV loans and any Thomas University employees associated with these loans. The term "employee" refers to any of the school's officers, employees and agents who are employed in the financial aid office or who have responsibilities with respect to student loans or who have responsibilities with respect to student loans related to Title IV education loans or private loans for educational purposes. The Code of Conduct establishes that:

1. Employees shall not enter into any revenue-sharing arrangement with any lender where the lender provides or issues a Title IV loan to the student or student's family in exchange for the school recommending the lender or the lender's loan products in exchange for a fee or material benefit including profit or revenue sharing that benefits the school or a school's employee or agent.
2. Refrain from taking any action from his or her personal benefit.
3. Refrain from taking any action he or she believes is contrary to law, regulations, or the best interests of the students and parents he or she serves.
4. Ensure that the information he or she provides is accurate, unbiased, and does not reflect any preference arising from actual or potential personal gain.
5. Be objective in making decisions and advising his or her institution regarding relationships with any entity involved in any aspect of student financial aid.
6. Refrain from soliciting or accepting anything other than nominal value from any entity (other than an institution of higher education or a governmental entity such as the U.S. Department of Education) involved in the making, holding, consolidating or processing of any student loans, including anything of value (including reimbursement of expenses) for serving on an advisory body or as part of a training activity of or sponsored by any such entity.
7. Disclose to his or her institution, in such manner as his or her institution may prescribe, any involvement with or interest in any entity involved in any aspect of student financial aid.