

## **Kettering University Federal and Private Loans Code of Conduct**

To comply with the 2008 Higher Education Opportunity Act, Kettering University adopts the following Student Loan Code of Conduct to serve as the formal guiding principles in insuring the integrity of the student financial aid process. All Kettering University officers, employees and agents who have responsibilities with respect to student educational loans are required to comply with this Student Loan Code of Conduct.

**No** employee, officer or agent of Kettering University will have any arrangement with a lender that results in the lender paying a fee or other benefits, including a share of profits, to the school, its officers, employees or agents, in exchange for loan referrals or preferential treatment.

**No** employee, officer or agent of Kettering University who has responsibilities with respect to education loans or financial aid services shall solicit or accept any gift from any lending institution.

Prohibited gifts include, but are not limited to:

- transportation
- lodging
- meals
- entertainment
- discounts
- loans
- favors or any other item having a monetary value of more than a de minimus amount

The law does provide for some exceptions related to specific types of activities or Literature:

- Brochures or training material related to default aversion or financial literacy
- Food, training or informational materials as part of training as long as that training contributes to the professional development of those individuals attending the training.
- Entrance and exit counseling as long as the institution's staff are in control and they do not promote the services of a specific lender.
- Philanthropic contributions from a lender, GA or servicer unrelated to education loans
- State education, grants, scholarships or financial aid funds administered by or on behalf of the State.

**No** employee, officer or agent of Kettering University who has responsibilities with respect to education loans or financial aid services shall accept from any lending institution any fee, payment, or other financial benefit as compensation for any type of consulting arrangement or other contract to provide services to any lending institution relating to education loans.

Kettering University **will not** request or accept any offer of funds for an opportunity loan pool, in exchange for providing concessions or promises to the lender for a specific number of loans, or inclusion on a preferred lender list.

Kettering University **will not** request or accept any assistance with call center staffing or financial aid office staffing.

**No** employee of Kettering University may receive anything of value from a lender, guarantor, or group in exchange for serving on an advisory boards. They may, however, accept reimbursement for reasonable expenses incurred while serving in this capacity.