

CODE OF CONDUCT
for
Lender Relationships & Education Loans
As required by federal regulations and the Higher Education Opportunity Act

Any Charter College/Charter Institute officer, employee and agent of the school is required to comply with this Code of Conduct for Lender Relationships & Education Loans as outlined below.

- Charter College/Charter Institute shall not enter into any revenue-sharing arrangements with any lender.
- Charter College/Charter Institute officers, employees or agents will not steer borrowers to particular lenders or delay loan certification.
- Charter College/Charter Institute shall not request or accept from any lender any offer of funds to be used for private education loans, including funds for an opportunity pool loan, to students in exchange for providing concessions or promises to the lender for specific number of FSA loans, a specified loan volume or a preferred lender arrangement.
- For any first-time borrower, Charter College/Charter Institute shall not assign, through award packaging or other methods, the borrower's private education loan to a particular lender; or refuse to certify, or delay certification, of any education loan based on the borrower's selection of a particular lender or guaranty agency.
- No officer or employee of Charter College/Charter Institute who is employed in the Student Finance Department or who otherwise has responsibilities with respect to education loans, or an agent who has responsibilities with respect to education loans, shall not accept from any lender or affiliate of any lender any fee, payment or other financial benefit (including the opportunity to purchase stock) as compensation for any type of consulting arrangement or other contract to provide services to a lender or on behalf of a lender relating to education loans.
- Charter College/Charter Institute shall not request or accept from any lender any assistance with call center staffing or financial aid office staffing. Assistance will be permitted for the following instances:
 - Professional development training for Student Finance Department staff;
 - Providing educational counseling materials, financial literacy materials, or debt management materials to borrowers, provided that such materials disclose to borrowers the identification of any lender that assisted in preparing or providing such materials; or
 - Staffing services on a short-term, nonrecurring basis to assist the institution with financial aid-related functions during emergencies, including State-declared or Federally declared natural disasters, Federally declared national disasters, and other localized disasters and emergencies identified by the Secretary of Education.
- Any employee who is employed in the Student Finance Department of Charter College/Charter Institute, or who otherwise has responsibilities with respect to the federal loan programs or private education loans or other student financial aid of the institution, and who serves on an advisory board, commission, or group established by a lender, guarantor or group of lenders or guarantors, shall be prohibited from soliciting or accepting any gift in excess of a de minimis amount from the lender, guarantor, or group of lenders or guarantors, except that the employee may be reimbursed for reasonable expenses incurred in serving on such advisory board, commission or group.