

Under federal law (specifically the **Higher Education Opportunity Act of 2008**), every college and university that participates in the federal student loan program must publish and enforce a **Student Loan Code of Conduct**.

The purpose of this code is to ban conflicts of interest between university financial aid officers and private lenders. Below are the mandatory prohibitions that every school's code must contain.

## 1. Ban on Revenue-Sharing Arrangements

- **The Rule:** Schools cannot enter into agreements where a lender pays the school a fee or percentage of profits in exchange for the school recommending that lender's loans to students.
- **In simple terms:** Your college cannot get a "kickback" for signing you up for a specific private loan.

## 2. Ban on Gifts

- **The Rule:** Financial aid office employees (and their family members) cannot accept gifts from lenders, guarantors, or loan servicers.
- **What counts as a "gift"?** Any gratuity, favor, discount, entertainment, hospitality, loan, or other item having a monetary value of more than a nominal amount.
- **Exceptions:** Standard materials like brochures, training materials, or food at a training conference are usually exempt.

## 3. Ban on Consulting or Contracting Fees

- **The Rule:** Financial aid staff cannot accept any fee, payment, or other financial benefit (including stock options) for acting as a consultant or providing services to a lender.

## 4. Ban on Steering Borrowers

- **The Rule:** For private student loans, schools cannot assign a first-time borrower's loan to a specific lender or refuse to certify a loan based on the borrower's choice of lender.
- **Preferred Lender Lists:** If a school provides a list of "preferred lenders," they must disclose *why* those lenders were chosen, confirm the lenders are not affiliates of each other, and explicitly state that students do not have to use the lenders on that list.

## 5. Ban on "Opportunity Pool" Offers

- **The Rule:** Schools cannot request or accept an offer of funds for private loans (an "opportunity pool") from a lender in exchange for providing the lender with a specific number of loans or a specific loan volume.
- **In simple terms:** A school cannot say to a bank, "We will give you all our business if you agree to lend to our high-risk students."

## **6. Ban on Staffing Assistance**

- **The Rule:** Schools cannot request or accept assistance from a lender to staff their financial aid office or call center.
- **Exception:** Lenders can provide professional development training or educational counseling materials, provided the lender's staff identifies themselves clearly and does not promote their specific products.

## **7. Ban on Advisory Board Compensation**

- **The Rule:** Financial aid office employees cannot receive compensation (money) for serving on a lender's advisory board.
- **Exception:** They may be reimbursed for reasonable expenses (like travel costs) incurred in serving on the board.