UMF Code of Conduct

In accordance with the Higher Education Opportunity Act (Public Law 110-315)(HEOA), UMF is complying with the Program Participation Agreement requirement by publishing this Code of Conduct. In the HEOA, each institution that has a preferred lender arrangement for the purpose of offering FFEL or private education loans must comply with the code of conduct that is required under section 487(a)(25) of the HEA by institutions of higher education participating in the Title IV student loan programs (see Title IV-Student Assistance, Title IV programs-General, Program Participating Agreement, Code of Conduct). Although UMF does not have preferred lender list, this code of conduct is to reinforce our commitment to maintaining the highest standards in the best interest of our educational loan borrowers.

This Code of Conduct applies to all of the officers, employees, and agents of the institution.

UMF officers, employees and agents shall not participate in the following activities:

- revenue-sharing arrangements with any lender. The HEOA defines "revenue-sharing arrangements" as any arrangement between an institution and a Page 70 of 219- The Higher Education Opportunity Act lender under which the lender makes Title IV loans to students attending the institution (or to the families of those students), the institution recommends the lender or the loan products of the lender and, in exchange, the lender pays a fee or provides other material benefits, including revenue or profit-sharing, to the institution or its officers, employees, or agents;
- employees of the Financial Aid Office receiving gifts from a lender, guaranty agency or loan servicer. No officer of employee of an institution's Financial Aid Office (or an employee or agent who otherwise has responsibilities with respect to education loans) may

solicit or accept any gift from a lender, guarantor, or servicer of education loans. A "gift" is defined as any gratuity, favor, discount, entertainment, hospitality, loan or other item having monetary value of more than $10 per employee in the department. However, a gift does not include (1) brochure, workshop, or training using standard materials relating to a loan, default aversion, or financial literacy, such as a brochure, workshop or training; (2) food, training, or informational material provided as part of a training session designed to improve the service of a lender, guarantor, or servicer if the training contributes to the professional development of the institutions Officer, employee or agent; (3) favorable terms and benefits on an education loan provided to a student employed by the institution if those terms and benefits are comparable to those provided to all students at the institution; (4) entrance and exit counseling as long as the institution's staff are in control of the counseling and the counseling does not promote the services of a specific lender; (5) philanthropic contributions from a lender, guarantor, or servicer that are unrelated to education loans or any contribution that is not made in exchange for advantage related to education loans, and; (6) State education grants, scholarships, or financial aid funds administered by or on behalf of a State;

- contracting arrangements. No officer or employee of an institution's Financial Aid Office (or employee or agent who otherwise has responsibilities with respect to education loans) may accept from a lender, or an affiliate of any lender, any fee, payment, or other financial benefit as compensation for any type of consulting arrangement or contract to provide services to or on behalf of a lender relating to education loans;
- steering borrowers to particular lenders or delaying loan certifications. For any first time borrower, an institution may not assign, through the award packaging or other methods, the borrower's loan to a particular lender. In additional, the institution may not refuse to certify, or delay

the certification, of any loan based on the borrower's selection of a particular lender guaranty agency;

- receiving offers of funds for private loans. An institution may not request or accept from any lender any offer of funds for private loans, including funds for an opportunity pool loan, to students in exchange for providing concessions or promises to the lender for a specific number of Title IV loans made, insured or guaranteed, a specific loan volume, or a preferred lender arrangement. An "opportunity pool loan" is defined as private education loan by a lender to a student (or the student's family) that involves a payment by the institution to the lender of extending credit to the student;
- staffing assistance. An institution may not request or accept from any lender any assistance with call center staffing or financial aid office staffing, except as permitted through The Higher Education Opportunity Act where it is allowable for a lender to provide professional development training, educational counseling materials (as long as the materials identify the lender that assisted in preparing the materials), or staffing services on a short-term, nonrecurring basis during emergencies or disasters; and
- advisory board compensation. An employee of an institution's financial aid office (or employee who otherwise has responsibilities with respect to education loans or financial aid) who serves on an advisory board, commission, or group established by a lender or guarantor (or a group of lenders or guarantors) is prohibited from receiving anything of value from the lender, guarantor, or group except for reimbursement for reasonable expenses incurred by the employee for serving on the board.