Code of Conduct for Education Loans

UW Student Financial Services

Contact Us
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As a member of the National Association of Student Financial Aid Administrators (NASFAA), the University of Wyoming follows professional standards established in NASFAA's Statement of Ethical Principles and Code of Conduct for institutional financial aid professionals. Student Financial Services maintains this Code of Conduct to support ethical, unbiased, and student-centered administration of student financial aid.

Purpose

The purpose of this policy is to prohibit conflicts of interest in situations involving student financial aid and to establish standards of conduct for employees with responsibility for student financial aid.

Applicability

This policy applies to all employees who work in Student Financial Services (SFS) and all other University employees who have responsibilities related to education loans or other forms of student financial aid.

Definitions

Conflict of Interest: A conflict of interest exists when an employee's financial interests or other opportunities for personal benefit may compromise, or reasonably appear to compromise, the independence of judgment with which the employee performs their responsibilities at the University.

Gift: Any gratuity, favor, discount, entertainment, hospitality, loan, or other item having a monetary value of more than a de minimis amount. The term includes a gift of services, transportation, lodging, or meals, whether provided in kind, by purchase of a ticket, payment in advance, or reimbursement after the expense has been incurred.

The term "gift" does not include any of the following:

- Standard materials, activities, or programs on issues related to a loan, default aversion, default prevention, or financial literacy, such as a brochure, workshop, or training.
- Training or informational material furnished to the University as an integral part of a training session designed to improve the service of a lender, guarantor, or servicer of educational loans to the University, if such training contributes to the professional development of the University's employees.
- Favorable terms, conditions, and borrower benefits on an education loan provided to a student employed by the University or an employee who is the parent of a student, if such terms, conditions, or benefits are comparable to those provided to all students at the University and are not provided because of the student's or parent's employment with the University.
- Entrance and exit counseling services provided to borrowers to meet the University's responsibilities for entrance and exit counseling under federal law, so long as the University's employees are in control of the counseling and such counseling does not promote the products or services of any specific lender.
- Philanthropic contributions to an institution from a lender, servicer, or guarantor of education loans that are unrelated to education loans, or any contribution from any lender, guarantor, or servicer that is not made in exchange for any advantage related to education loans.
- State education grants, scholarships, or financial aid funds administered by or on behalf of a State.

Opportunity Pool Loan: A private education loan made by a lender to a student attending the University or the family member of such a student that involves a payment, directly or indirectly, by the University of points, premiums, additional interest, or financial support to such lender for the purpose of the lender extending credit to the student or the family.

Revenue-Sharing Arrangement: An arrangement between the University and a lender under which:

- A lender provides or issues a loan to students attending the University or to their families; and
- The University 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 University or its employees.

Institutional Policy Regarding Education Loans and Student Financial Aid

Revenue-Sharing Arrangements
The University will not enter into any revenue-sharing arrangement with any lender.

Interaction with Borrowers
The University currently participates in the Federal Direct Loan Program. Federal Direct Loans are made by the U.S. Department of Education.

Under no circumstances will the University assign a student's private education loan to a particular lender or refuse to certify or delay certification of any private education loan based upon the borrower's selection of lender or guaranty agency.

Private Education Loans
The University will 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 the University providing concessions or promises regarding providing the lender with:

- A specified number of federal loans;
- A specified federal loan volume; or
- A preferred lender arrangement for federal loans.

Co-Branding
The University will not permit a private educational lender to use the University's name, emblem, mascot, logo, or any other words, pictures, or symbols associated with the University to imply endorsement of private educational loans by that lender.

Preferred Lender Arrangements
The University of Wyoming does not maintain a preferred lender list and does not have preferred lender arrangements with private education loan providers. Students may choose any eligible lender, and Student Financial Services will process eligible private education loan certifications without preference or unnecessary delay based on the lender selected by the student.

Staffing Assistance
The University will not request or accept from any lender any assistance with call center staffing or financial aid office staffing.

Nothing in this section, however, prevents the University from accepting assistance from a lender related to:

Professional development training for University 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 University 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.

Code of Conduct

Conflicts of Interest
No employee shall have a conflict of interest with respect to any education loan or other student financial aid for which the employee has responsibility.

Code of Conduct continued

Gifts
No employee may accept any gift from a lender, guarantor, or servicer of education loans.

A gift to a family member of an employee or to any other individual based on that individual's relationship with the employee shall be considered a gift to the employee if the gift is given with the knowledge and acquiescence of the employee and the employee has reason to believe the gift was given because of the employee's position at the University.

Token awards from professional associations, including state, regional, or national associations, that recognize professional milestones or extraordinary service to parents and students, or scholarships for conference attendance or other professional development opportunities, may be accepted.

Prohibited Contracting Arrangements
No employee shall 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.

Advisory Board Compensation
No employee who serves on an advisory board, commission, or group established by a lender, guarantor, or group of lenders or guarantors may receive anything of value from the lender, guarantor, or group of lenders or guarantors in return for that service.

Reimbursement of Expenses
Expenses incurred while attending professional association meetings, conferences, or in connection with service on an advisory board, commission, or group described in this policy must be paid by the University.

Entertainment expenses, such as concert or sports tickets or greens fees, may not be accepted. Employees are expected to personally pay for such expenses or request reimbursement from the University in accordance with University policy.

Meals
Employees may occasionally need to share meals with employees of lenders, guaranty agencies, state agencies, or other colleges or universities in the course of business.

Meals offered as part of meetings, conferences, or other events may be accepted if all participants in the meeting or event are offered the meals or if the meals are included as part of a registration fee.

Annual Notice/Training and Public Posting

Student Financial Services will review this Code of Conduct periodically and provide annual notice/training to employees with responsibilities related to education loans or other forms of student financial aid.

The University of Wyoming will make this Code of Conduct publicly available on the Student Financial Services website. Questions may be directed to Student Financial Services at sfs@uwyo.edu.

Policy Violations

Violations of this policy may result in disciplinary action up to, and including, dismissal.

References and Notes

Higher Education Act of 1965, as amended; 34 CFR Part 601, including 34 CFR § 601.21; Truth in Lending Act, 15 U.S.C. § 1631 et seq.; NASFAA Statement of Ethical Principles and Code of Conduct for Institutional Financial Aid Professionals; applicable University of Wyoming policies related to conflicts of interest, employee conduct, privacy, and student records.

[1] Agents of the University with responsibility for education loans or other student financial aid are also expected to abide by the terms of this policy.

[2] Private education loan as defined in the federal Truth in Lending Act, 15 U.S.C. § 1631 et seq.

[3] Private educational lender as defined in the federal Truth in Lending Act, 15 U.S.C. § 1631 et seq.

[4] For the purposes of this policy, a "relative" is defined as an individual with whom an employee has a relationship by blood, marriage, adoption, domestic partnership, or other personal relationship in which objectivity might be impaired.