

Midland University's Financial Aid Code of Conduct

The Higher Education Opportunity Act conditions the eligibility of educational institutions to participate in Title IV programs on the development of and compliance with a code of conduct which prohibits conflicts of interest for its financial aid personnel. Midland University's officers, employees and its agents are required to comply with this code of conduct. The following specific provisions bring Midland University into compliance with the federal law.

Code of Conduct:

Staff members in the Financial Aid Office have always been bound to act in compliance with the vision outlined in our Mission Statement and the National Association of Student Financial Aid Administrator's Statement of Ethical Principles and Code of Conduct for Institutional Financial Aid Professionals.

- Midland University does not have a preferred lender list. However upon request it will provide a historical list of private education lenders students and/or parents have used in the past 4 academic years.
- Midland University does not recommend any particular alternative or private education loan lender to any student or the student's family.
- Neither Midland University as an institution, nor any individual officer, employee or agent shall enter into any revenue-sharing arrangement with any lender.
- No officer or employee of Midland University who is employed in the financial aid office or who otherwise has responsibilities with respect to education loans, or an agent who has responsibilities with respect to education loans, or any of their family members, shall solicit or accept any gift from a lender, guarantor, or servicer of education loans. For purposes of this prohibition, the term "gift" means any gratuity, favor, discount, entertainment, hospitality, loan or other item having a monetary value of more than a nominal amount. (Nominal value is valued at \$10 or less).
- An officer or employee of Midland University who is employed in the financial aid office 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.
- Midland University shall not request or accept from any lender any assistance with call center staffing or financial aid staffing.
- Any employee who is employed in the financial aid office, or who otherwise has responsibilities with respect to education loans or other student financial aid, and who serves on an advisory board, commission, or group established by a lender, or group of lenders shall be prohibited from receiving anything of value 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 an advisory board, commission, or group.

- Financial aid staff can participate in meals, refreshments and receptions that are in conjunction with meetings, trainings, or conference events that are open to all attendees.
- Office visits by lenders/guarantors are normally limited to once per quarter.

Staff who knowingly fail to follow these guidelines will be subject to disciplinary action.