

## Financial Aid Office | Student Loan Code of Conduct

The Higher Education Opportunity Act (HEOA) of 2008 requires institutions of higher education to develop and enforce a code of conduct that prohibits conflicts of interest for financial aid personnel. In compliance with this requirement, **Moody Bible Institute has created the following code of conduct based on the HEOA of 2008:**

Other Institute employees, officers and agents with responsibilities in respect to educational loans must also comply with this policy.

### CODE OF CONDUCT

**Conflict of Interest** – No Moody Bible Institute employee shall have a conflict of interest with respect to any education loan or other student financial aid for which the employee has responsibility.

**Ban on Revenue-Sharing Arrangements** – Moody Bible Institute shall not enter into any revenue-sharing arrangement with any lender or other vendor working with the Financial Aid Office. The Institute shall not accept any fee or other material benefit in exchange for recommending a lender to its students.

**Gift Ban** – No Moody Bible Institute officer or employee with financial aid responsibilities shall solicit or accept a gift (e.g., a gift of services, transportation, lodging or meals, provided by purchase of a ticket, payment in advance or reimbursement) having a monetary value of more than a nominal amount from lenders, guarantors or servicers of education loans.

**Contracting Arrangements Prohibited** – No Institute officer or employee with financial aid responsibilities shall accept from any lender or lender affiliate any payment or other financial benefit as compensation for any type of consulting arrangement or other contract to provide services to a lender.

**Interaction with Borrowers** – Moody Bible Institute shall not automatically assign a particular lender to any borrower and shall not refuse to certify or delay certification of any loan based on the lender or guarantee agency selected.

**Prohibition on Offers of Funds for Private Loans** – Moody Bible Institute shall not request or accept from any lender an offer of funds to be used for private education loans in exchange for the Institute providing the lender with a specified number or volume of loans made or in exchange for placement on a preferred lender list.

**Co-branding** – Moody Bible Institute prohibits any private educational lender from using the Institute's name, emblem and logo as well as any words, pictures or symbols associated with the Institute to imply endorsement of private education loans by that lender.

**Ban on Staffing Assistance** – Moody Bible Institute shall not request or accept from any lender any assistance with call center staffing or financial aid office staffing. Lenders, however, may provide professional development training to financial aid administrators, educational advising materials to borrowers or assistance in state or federally-declared natural disasters.

**Advisory Board Assistance** – All Moody Bible Institute employees with financial aid responsibilities shall be prohibited from receiving anything of value from a lender or guarantor in return for service on its advisory board. Reimbursement for reasonable expenses incurred in connection with such service, however, is permitted.

For the following purposes, it is **not** considered a "gift" to the school for a lender or guarantor to provide:

- Standard materials, activities or programs on issues related to a loan, default aversion, default prevention or financial literacy (i.e. brochures, workshops, training)
- Food, refreshments, training or informational material that is designed to improve the service of a lender, guarantor, or servicer if the training contributes to the professional development of the school staff
- Favorable terms, conditions and borrower benefits, as long as these are provided to all students at the school
- Entrance and exit counseling services, as long as the school controls the counseling and does not promote the products and services of the lender
- Philanthropic contributions not tied to loan volume