

## Ohio Northern University's Office of Financial Aid Code of Conduct Policy

The Higher Education Opportunity Act sets conditions for educational institutions to participate in Title IV programs and requires the development of and compliance with a code of conduct prohibiting conflicts of interest for its financial aid personnel [HEOA § 487(a)(25)]. Ohio Northern University's officers, employees and agents are required to comply with this code of conduct. The following specific provisions bring Ohio Northern University into compliance with the federal law [HEOA § 487(e)].

1. Neither Ohio Northern University as an institution nor any individual officer, employee or agent shall enter into any revenue-sharing arrangements with any lender.
2. No officer or employee of Ohio Northern University, who is employed in the financial aid office or who otherwise has responsibilities with respect to education loans, or 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 de minimus amount.
3. An officer or employee of Ohio Northern 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.
4. Ohio Northern University shall not:
  - a. assign through award packaging or other methods any first-time borrower's loan to a particular lender; or
  - b. refuse to certify or delay certification of any loan based on the borrower's selection of a particular lender or guaranty agency.
5. Ohio Northern University shall 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 institution providing concessions or promises regarding providing the lender with:
  - a. a specified number of loans made, insured, or guaranteed under Title IV;
  - b. a specified loan volume of such loans; or
  - c. a preferred lender arrangement for such loans.
6. Ohio Northern University shall not request or accept from any lender any assistance with call center staffing or financial aid office staffing.
7. No one who is employed in the financial aid office or has any responsibilities with respect to education loans or other student financial aid shall derive any material benefit from serving on an advisory board, commission, or group established by a lender, guarantor, or group of lenders or guarantors. These individuals also shall be prohibited from receiving anything of value from any lender, guarantor, or group of lenders or guarantors, except for reimbursement for reasonable expenses incurred in serving on such an advisory board, commission, or group.