

Financial Aid Code of Conduct

Institutions that participate in Title IV, HEA programs are required to develop, publish, administer and enforce a code of conduct in respect to loans with which the institution's officers, employees and agents shall comply.

The Arkansas Colleges of Health Education (ACHE) is committed to providing the best information and resources to students and their families regarding student loan borrowing. In support of this and in an effort to rule out any perceived or actual conflict of interest between ACHE officers, employees or agents and education loan lenders, ACHE has adopted the following student lending code of conduct:

- Shall not participate or enter into in any revenue-sharing arrangements with any lender.
- No action will be taken by employees in the financial aid office or otherwise involved in the administration of education loans that is for their personal benefit or could be perceived to be a conflict of interest as follows:
 - Acceptance of any gifts of greater than a nominal value from any lender, guarantor or servicer.
 - Acceptance of any fees, payments or other financial benefits (including a stock purchase option) from a lender as a compensation for any type of consulting arrangement or contract to provide services to a lender or on behalf of a lender relating to education loans.
 - Awarding aid to themselves or their immediate family members.
 - Acceptance of anything of value from a lender, guarantor or group of lenders and/or guarantors in exchange for service on an advisory board, commission or other group established by such a lender, guarantor group of lenders and/or guarantors. ACHE does allow for the reasonable reimbursement of expenses associated with participation on such boards, commissions or groups by lenders, guarantors or groups of lenders and/or guarantors.
 - Acceptance of any amount of cash, gift, or benefit in excess of a **de minimus amount** by a financial aid staff member from any financial aid applicant (or his/her family).
- Borrowers have the right to choose any lender from which to borrow to finance his/her education. AHCE will not deny, impede, or unnecessarily delay certification of a loan based upon the borrower's selection of a lender and/or guarantor. ACHE will not assign a lender to any first-time borrower through any means.
- Shall not request nor accept any offer of funds to be used for private education loans to students from any lender in exchange for providing the lender with a specified number or volume of Title IV loans, or a preferred lender arrangement for Title IV loans.
- The financial aid office will provide information that is accurate, unbiased and does not reflect preference arising from actual or potential personal gain.
- Shall not accept staffing assistance from any lender with call center or financial aid office staffing. However, professional development training for financial aid administrators,

educational counseling/financial literacy/debt management materials for borrowers that disclose the identification of the lender that assisted in preparing and providing the materials, or staffing services on a short-term, non-recurring basis during State or federally declared natural disasters, federally declared national disasters, and other localized disaster and emergencies identified by ED are not prohibited.

- Financial aid staff will disclose to ACHE any involvement, interest in, or potential conflict of interest with any entity with which the institution has a business relationship.

This Title IV Code of Conduct will be evaluated periodically and enforced by ACHE. Any officer or employee or agent of ACHE in violation of any part of this code will be subject to disciplinary proceedings up to termination of employment if so warranted.