



Student Loan Code of Conduct

Cuyahoga Community College (Tri-C) participates in both the William D. Ford Federal Direct Loan Program, which includes the Direct Subsidized and Direct Unsubsidized Student Loans, and the Direct Parent PLUS Loans, and the Federal Perkins Loan Program. To a lesser extent, private loans are also processed for students on an as needed basis. To comply Higher Education Act (HEA) of 1965, as amended to the Higher Education Opportunity Act in 2008, (HEOA, enacted August 14, 2008), Cuyahoga Community College adopts the following Student Loan Code of Conduct to serve as the formal guiding principles in insuring the integrity of the student aid process and ethical conduct of Cuyahoga Community College employees in regard to student loan practices.

1. Revenue Sharing

Cuyahoga Community College and its employees will not enter into any type of revenue-sharing arrangement with any lender, guarantor or servicer. The term "revenue-sharing arrangement" means an arrangement between an institution and a lender which – (i) a lender provides or issues a loan that is made, insured, or guaranteed to students under the Higher Education Act attending the institution or to the families of such students; and (ii) the institution 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 institution, an officer or employee of the institution. Cuyahoga Community College does not provide students a preferred lender list from which to select a lender for a private student loan. All loans are processed without regard to lender or mode of transmission (i.e., electronic or paper). Cuyahoga Community College will neither recommend a private loan lender nor accept material benefits including revenue or profit sharing to the institution, an officer, or an employee of the institution or an agent.

2. Gifts

Employees of the Student Financial Aid & Scholarships Office, the Office of the Bursar, and the Student Accounting Office are prohibited from soliciting or accepting any gift from a lender, guarantor, or loan servicer of education loans.

- a. Gifts include any gratuity, favor, discount, entertainment, hospitality, loan or other item to any Tri-C employee. This 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 incurred.
- b. Gifts to family members of a Cuyahoga Community College employee are considered to be a gift to the employee if the gift is given with the knowledge and acquiescence of the employee and there is reason to believe the gift was given because of the official position of that employee.

3. Contracting Arrangements

Employees of the Student Financial Aid & Scholarships, Office of the Bursar, and the Student Accounting Office shall not accept from any lender or affiliate of any lender any fee, payment, or other financial benefit (including opportunity to purchase stock) as compensation for any consulting arrangement or other contract to provide services to a lender or on behalf of a lender relating to education loans.

4. Preferred Lender Status

Cuyahoga Community College participates in the William D. Ford Federal Direct Loan Program which provides student and parent loans through the U.S. Department of Education. Lenders in

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the private student loan industry will not be given a preferred status. Cuyahoga Community College will not produce a preferred lender list that gives any lender an advantage in securing business from Cuyahoga Community College students. However, Cuyahoga Community College will inform students interested in private loans of William D. Ford Federal Student Loans as a low-interest option, before certifying alternative and private loan applications.

5. Interaction with Borrowers

Cuyahoga Community College will not assign a borrower's private student loan to a particular lender; all decisions will be made by the borrower in his/her independent review of borrower benefits and lender services. Further, Cuyahoga Community College will not refuse to certify, or delay certification of, any loan based on the borrower's selection of a particular lender or guaranty agency.

6. Opportunity Pool Loan

Cuyahoga Community College will not request or accept from any lender any offer of funds to be used for private education loans (as defined in Section 140 of the Truth in Lending Act) including funds for an opportunity pool loan in exchange for Cuyahoga Community College providing concessions or promises regarding providing the lender with a specified number of loans made, insured or guaranteed; a specified loan volume of such loans; or a preferred lender arrangement for such loans.

7. Staffing Assistance

Cuyahoga Community College will not request or accept from any lender, guarantor, or servicer of student loans any assistance with call center staffing or financial aid office staffing. Approved third party servicers who administer student loans programs and other financial aid services are available to assist students with questions regarding specific processes associated with the services provided by the servicer on behalf of Cuyahoga Community College.

8. Advisory Board Compensation

Employees of the Student Financial Assistance & Scholarships Office, the Office of the Bursar, and the Student Accounting Office who may serve on an advisory board, commission, or group established by a lender, guarantor, or group of lenders or guarantors, are 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 advisory board, commission, or group.