

Case Western Reserve University
Office of Financial Aid
Student Loan Code of Conduct

Case Western Reserve University participates in the Federal Direct Student Loan program. As a requirement of participating in this federal loan program, federal regulations require that the university develop, publish, administer and enforce a code of conduct with respect to student loans. Case Western Reserve University is committed to the highest ethical and professional standards of conduct, and intends to operate in full compliance with all applicable laws and policies. In addition, the University Compliance Program has a comprehensive Code of Conduct that covers university-wide policies.

Student Loan Code of Conduct Principles:

1. All CWRU employees with responsibilities for student loans are annually informed of the provisions and principles herein.
2. CWRU and its employees are prohibited from participating in any revenue-sharing arrangement with student loan lenders. This includes any arrangement where CWRU would recommend a lender or its loan products in exchange for a fee or other material benefits, including profit sharing.
3. CWRU Financial Aid staff are prohibited from soliciting, accepting or receiving gifts from a lender, a guarantor or servicer of student loans.
 - a. The term "gift" here is defined as any gratuity, favor, discount, entertainment, hospitality, loan or other item having a monetary value of more than a de minimus amount as well as gifts of services, transportation, lodging, or meals, whether provided in kind, by purchase of a ticket, payment in advance, or reimbursement after the expense has been incurred.
 - b. The term "gift" here does not include standard material, activities, or programs on issues related to a loan, default aversion, default prevention, or financial literacy, such as a brochure, a workshop, or training. It does not include food, refreshments, training, or informational material furnished as an integral part of a training session if such training contributes to the staff's professional development. It also excludes favorable terms, conditions, and borrower benefits on an education loan provided that are comparable to those provided to all students; entrance and exit counseling services provided to CWRU students when CWRU staff are in control of the counseling (whether in person or via electronic capabilities) and such counseling does not promote the products or services of any specific lender; philanthropic contributions to an institution from a lender, servicer, or guarantor that are unrelated to education loans or that is not made in exchange for any advantage related to

education loans; and state education grants, scholarships, or financial aid funds administered by or on behalf of a State.

- c. Gifts to family members and other relations of Financial Aid staff are also prohibited when the gift is given with the knowledge and acquiescence of the staff member and that they have reason to believe that the gift was given because of their official position at CWRU.
4. CWRU Financial Aid staff are prohibited from consulting or other contracting arrangements with any lender or affiliate for a fee, payment, or other financial benefit including the opportunity to purchase stock.
5. CWRU and its employees are prohibited from directing student loan borrowers to particular lenders or delaying loan certifications based on a borrower's selection of a particular lender or guarantor. Student loan borrowers are free to choose the lender or guarantor of their choice.
6. CWRU and its employees are prohibited from requesting or accepting any offer of funds to be used for private education loans including funds for an "opportunity pool" loan, in exchange for concessions or promises of providing that lender with a specified number of loans, loan volume or a preferred lender arrangement.
7. CWRU and its employees are prohibited from requesting or accepting any assistance with call center staffing or financial aid office staffing other than standard professional development training for financial aid administrators; educational counseling, financial literacy or debt management materials when the materials clearly identify the lender that prepared the materials; and staffing services on a short-term, nonrecurring basis such as financial aid functions during emergencies, including State-declared or Federally declared natural disasters.
8. CWRU employees in the Office of University Financial Aid, or who otherwise have responsibilities with respect to student financial aid, may not serve on an advisory board or commission of a single or a group of lenders or guarantors. They are also prohibited from receiving anything of value from a single or a group of lenders or guarantors.