St. Joseph School of Nursing - Financial Aid Code of Conduct

This policy is applicable to St. Joseph School of Nursing administrators, coordinators, employees, and agents, and it prohibits a conflict of interest with their responsibilities with respect to Title IV loans. The policy is part of the institutions' commitment to the highest ethical standards and conduct by its employees. It applies specifically to conduct related to financial aid.

As part of its commitment to the highest ethical standards in connection with its responsibilities regarding Federal financial aid, **St. Joseph School of Nursing** will not:

- Receive anything of value from any lender in exchange for any advantage sought by the lender in making educational loans available to enrolled or prospective students of **St. Joseph School of Nursing**

- Assign, through award packaging or other methods, a first-time borrower's loan to a particular lender, or refuse to certify or delay certification of any loan based on the borrower's selection of a particular lender or guaranty agency.

- Enter into any revenue-sharing arrangement with any lender under which **St. Joseph School of Nursing** recommends a lender or its products in exchange for a fee or other material benefits from the lender, and the lender provides or issues a loan that is made, insured, or guaranteed under Title IV to students attending **St. Joseph School of Nursing** (or their families).

- 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 concessions or promises to provide the lender with a specified number of loans made, insured, or guaranteed under Title IV; a specified loan volume of such loans; or a preferred lender arrangement for such loans.

- Request or accept from any lender any assistance with call center staffing or financial aid office staffing.

- Use Federal funds received under Federal financial aid programs to hire a registered lobbyist or pay any person or entity for securing an earmark to any legislation. **St. Joseph School of Nursing** will not use such funds to pay any person for influencing or attempting to influence an officer or employee of any Agency, Member of Congress, officer or employee of Congress, or employee of a Member of Congress in connection with the awarding of any Federal contract, making of any Federal grant or loan, entering into any Federal cooperative agreement, or the extension, continuation, renewal, amendment or modification of any Federal contract, grant, loan or cooperative agreement.

Responsibilities of St. Joseph School of Nursing Employees and Agents
Any **officer** or **employee**, or **agent** of **St. Joseph School of Nursing** who is employed in the financial aid office of the school, or who otherwise has responsibilities with respect to educational loans or other financial aid of **St. Joseph School of Nursing**, is **prohibited** from:

- Soliciting or accepting any gift from a lender, guarantor, or servicer of educational loans for any item or service having more than a de minimis monetary value, other than standard

materials (brochures, training aids) related to topics such as default prevention or financial literacy.

- Accepting from a lender or its affiliate any fee, payment, or other financial benefit as compensation for any type of consulting arrangement or other contract to provide services to a lender relating to education loans.

- Receiving anything of value from a lender, guarantor or group of lenders or guarantors if the employee serves on an advisory board, commission, or group established by a lender or group of lenders. An employee may be reimbursed for reasonable expenses incurred in serving on such advisory board, commission or group.

Reporting Violations of This Policy

St. Joseph School of Nursing expects officers and employees covered by this policy to report violations of this policy to Rick Plamondon, VP of Finance/CFO. Failure to comply with this policy will result in disciplinary action, which may include termination of employment.