

**St. Bonaventure University  
Office of Financial Aid  
Code of Conduct**

The Higher Education Opportunity Act (HEOA) of 2008 requires institutions of higher education to develop and follow a financial aid code of conduct.

The Office of Financial Aid is a member of the National Association of Student Financial Aid Administrators (NASFAA) and also adheres to the [NASFAA Statement of Ethical Principles and Code of Conduct](#) which contains principles specific to the financial aid profession.

Consistent with the requirements of the HEOA and NASFAA, the Office of Financial Aid has adopted the following Code of Conduct for financial aid professionals. Other University staff with responsibilities related to education loans must also comply with this policy:

**Conflict of Interest**

No employee shall have a conflict of interest with respect to any education loan program or other student financial aid program for which the employee has responsibility.

**Ban on Revenue Sharing Arrangements**

The University shall not enter into any revenue-sharing arrangement with any lender or other vendor working with its financial aid office. The University shall not accept any fee or other material benefit in exchange for recommending a lender to its students.

**Gift Ban**

No University staff with financial aid responsibilities shall solicit or accept a gift (e.g. a gift of services, transportation, lodging, or meals, provided by purchase of a ticket, payment in advance, or reimbursement) having a monetary value of more than a de minimus amount from a lender, guarantor, or servicer of education loans.

**Contracting Arrangements Prohibited**

No University staff with financial aid responsibilities shall accept from any lender or lender affiliate any payment or other financial benefit as compensation for any type of consulting arrangement or other contract to provide services to a lender.

## **Interaction with Borrowers**

The University shall not automatically assign a particular lender to any borrower, and shall not refuse to certify or delay certification of any loan based on the lender or guarantee agency selected.

## **Prohibition on Offers of Funds for Private Loans**

The University shall not request or accept from any lender an offer of funds to be used for private education loans in exchange for the University providing the lender with a specified number or volume of federal loans made or in exchange for placement on a preferred lender list.

## **Co-branding**

The University prohibits any private educational lender from using the University's name, emblem and logo as well as any words, pictures, or symbols associated with the University to imply endorsement of private education loans by that lender.

## **Ban on Staffing Assistance**

The University shall not request or accept from any lender any assistance with call center staffing or financial aid office staffing.

## **Advisory Board Assistance**

All staff with financial aid responsibilities shall be prohibited from receiving anything of value from a lender or guarantor in return for service on its advisory board. Reimbursement for reasonable expenses incurred in connection with such service, however, is permitted.