



Student Awards & Financial Aid

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University of Windsor **Lending Code of Conduct** Related to Title IV HEA Loans

The Higher Education Opportunity Act of 2008 (HEOA) requires institutions participating in Title IV, HEA loan Programs to publish on the school's website a code of conduct that prohibits a conflict of interest with the responsibilities of an officer, employee or agent of the school with respect to private education loans. In addition, all agents with responsibility for Title IV HEA loan administration must be informed annually of the provisions of the code.

In keeping with this, the University of Windsor LENDING CODE OF CONDUCT specifies:

1) The institution must not enter into any revenue-sharing arrangement with any lender.

A revenue-sharing arrangement is an arrangement between a covered institution and a lender under which-

(i) A lender provides or issues a FFEL Program loan or private education loan to students 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;

2) An officer, employee or agent of the institution who has responsibilities with respect to FFEL Program loans or private education loans, must not solicit or accept any gift from a lender, guarantor, or servicer of FFEL Program loans or private education loans;

3) An officer, employee or agent of the institution who has responsibilities with respect to FFEL Program loans or private education loans, must not accept from any lender or affiliate of any lender any fee, payment, or other financial benefit (including the opportunity to purchase stock) as compensation for any type of consulting arrangement or other contract to provide services to a lender or on behalf of a lender relating to FFEL Program loans or private education loans;

4) The institution must not for any first-time borrower, assign the 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;

5) The institution must not 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 the institution providing concessions

or promises to the lender for a specified number of FFEL or private education loans, a specified loan volume, or a preferred lender arrangement.

6) The institution must not request or accept from any lender any assistance with call center staffing or financial aid office staffing;

7) An officer, employee or agent of the institution who has responsibilities with respect to FFEL Program loans or private education loans, or other student financial aid of the institution, and who serves on an advisory board, commission, or group established by a lender, guarantor, or group of lenders or guarantors, must not receive 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.