**Code of Conduct & Policy on Educational Loans**

This code of conduct applies to all college employees, board of director members, officers, and agents of the college, including without limitation individuals who are employed in the financial aid office or who otherwise have responsibilities with respect to educational loans. This code reflects the college’s commitment to conducting financial aid practices with integrity, free from conflicts of interest, in the interest of students, and in compliance with applicable law.

**Definitions**

For the purpose of this code of conduct, certain key terms are defined as follows:

**Lending Institution**

a.      any entity that itself of through an affiliate engages in the business of making loans to students, parents, or others for the purposes of financing higher education expenses or that securitizes such loans; or
b.      any entity, or association of entities, that guarantees or services educational loans; or
c.       any industry, trade, or professional association that receives money from any entity described in subsections (a) or (b) above.

**Preferred Lender Arrangement**

An arrangement or agreement between a lending institution and Kettering College

a.      under which a lending institution provides or otherwise issues educational loans to students attending Kettering College or the families of such students; and
b.      that relates to Kettering College or an affiliated organization recommending, promoting, or endorsing the educational loan products of the lending institution.

**Revenue Sharing Arrangement**

Any arrangement between Kettering College and a lending institution that results in the lending institution paying a fee or other benefits, including a share of the profits, to Kettering College, its employees, board members, officers, or agents as a result of Kettering College recommending the lender to its students or the families of those students.

**Policy:**

●      Does not require the use of a particular lending institution or limit the choice of lending institutions.
●      Does not recommend particular lending institutions to students or families of those students.
●      Does not maintain a Preferred Lender list or have any Preferred Lender arrangements.
●      Processes loan applications through any lending institution a student or parent chooses.
●      Does not assign to any borrower, through award packaging or any other methods, a loan from a particular lending institution and does not delay certification or refuse to certify any loan based on the borrower’s selection of a particular lending institution.
●      Prohibits conflicts of interest in respect to the loans.
●      Prohibits revenue sharing arrangements with any lending institution.
●      Does not accept anything of value from any lending institution in exchange for certifying educational loans to students admitted to Kettering College.
●      Prohibits employees of the Student Finance Office, or any employee who has responsibilities in relating to educational loans, from accepting from a lending institution any gift worth more than a nominal value. Gifts include, but are not limited to, any gratuity, favor, discount, loan, hospitality, entertainment, etc.
●      Prohibits employees of the Student Finance Office, or any employee who has responsibilities in relating to educational loans, from entering into any type of consulting arrangement or other contract to provide lender institution services relating to educational loans.
●      Prohibits employees of the Student Finance Office, or any employee who has responsibilities in relating to educational loans, who serve on an advisory board relating to educational loans established by a lending institution or a group of lending institutions from receiving anything of value from the lending institution(s) in connection with serving on such an advisory board.
●      Prohibits external lending institutions’ employees or representatives from providing staffing to the Student Finance Office at Kettering College.