

UNIVERSITY OF NORTH TEXAS CODE OF CONDUCT FOR FINANCIAL AID PROFESSIONALS

In order to prevent any conflicts of interest in the administration of programs for Federal Student Assistance, the University of North Texas (“UNT” or “the University”) has adopted a Code of Conduct for Financial Aid Professionals. The Code of Conduct specifically applies to:

- All officers or employees of the University who are employed in the Office of Student Financial Aid and Scholarships;
- All officers or employees of the University who have responsibilities with respect to educational loans; and
- All agents of the University who have responsibilities with respect to educational loans.

Individuals who are subject to this Code of Conduct (hereinafter “officers, employees and agents”) must conduct themselves in accordance with the University’s ethics policy ([UNT Policy 05.015](#)) and policy concerning the reporting of suspected wrongdoing ([UNT Policy 04.009](#)), as well as the standards set out below:

1. **Gifts.** No officer, employee or agent shall solicit or accept any gift from a lender, guarantor or servicer of educational loans.
 - a. “Gifts” include:
 - i. Any gratuity, favor, discount, entertainment, hospitality, loan or other item in excess of \$50, including all cash or negotiable instruments.
 - ii. Any gift of service, transportation, lodging or meals, whether provided in kind, by purchase of a ticket, payment in advance, or reimbursement after the expense has been incurred.
 - iii. Any gifts to family members or any other individual based on the individual’s relationship with the officer, employee or agent if: (i) the gift was given with the knowledge and acquiescence of the officer, employee or agent and (ii) the officer, employee or agent had reason to believe the gift was given because of her or his official position.
 - b. “Gifts” do not include:
 - i. Standard materials, activities, or programs related to a loan, default aversion, default prevention, or financial literacy (such as a brochure, workshop, or training).
 - ii. Food, refreshments, training, or informational material furnished to an officer, employee or agent, as an integral part of a training session that is designed to improve the service of a lender, guarantor, or servicer of education loans to UNT, if such training contributes to the professional development of the officer, employee, or agent.

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- iii. Favorable terms, conditions, and borrower benefits on an education loan provided to a student employed by UNT if such terms, conditions, or benefits are comparable to those provided to all students of UNT.
 - iv. Entrance and exit counseling services provided to borrowers to meet UNT's responsibilities for entrance and exit counseling, as long as UNT is in control of the counseling and the specific lender's products and services are not promoted.
 - v. Philanthropic contributions to UNT from a lender, servicer, or guarantor of education loans that are unrelated to education loans or any contribution from any lender, guarantor, or servicer that is not made in exchange for any advantage related to education loans.
 - vi. State education grants, scholarships, or financial aid funds administered by or on behalf of a state.
2. **Stock Ownership.** A person employed by the University of North Texas in the Office of Student Financial Aid and Scholarships may not own stock or hold ownership interest in a student loan lender, other than through ownership of shares in a publicly traded mutual fund or similar investment vehicle in which the person does not exercise any discretion regarding the investment of the assets of the fund or other investment vehicle. For the purposes of this section, a "student loan lender" means a person whose primary business is: (a) making, brokering, arranging, or accepting applications for student loans; or (b) a combination of activities described in subsection (a).
3. **Compensation for Services to a Lender.** No officer, employee or agent shall accept any fee, payment or other financial benefit (including the opportunity to purchase stock) as compensation for providing services to a lender or on behalf of a lender relating to education loans. This provision does not prohibit:
- a. an officer or employee who is not employed by the UNT Office of Student Financial Aid and Scholarships but who has responsibility with respect to educational loans as a result of a position held at the institution, or an agent who has responsibility with respect to educational loans, from performing paid or unpaid service on a board of directors of a lender, guarantor, or servicer of education loans, to the extent permitted by University policies.
 - b. an officer, employee, or contractor of a lender, guarantor, or servicer of education loans from serving on the UNT System Board of Regents, to the extent permitted by University policies and the UNT System Board of Regents Rules.
4. **Advisory Board Compensation.** No officer, employee or agent who serves on an advisory board, commission or group established by a lender, guarantor or group

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of lenders or guarantors shall receive anything of value from the lender, guarantor or group of guarantors, other than the reimbursement of reasonable expenses incurred in service to such an advisory board, commission or group.

5. **Prohibited Agreements and Practices.** No officer, employee or agent may:
- a. Enter into a revenue-sharing arrangement with any lender.
 - b. Assign any first-time borrower's loan, through award packaging or other method, to a particular lender.
 - c. Refuse to certify or delay certification of any loan based on the borrower's selection of a particular lender or guarantee agency.
 - d. Request or accept from a lender any offer of funds to be used for private education loans (including opportunity pool loans) to students in exchange for providing concessions or promises regarding providing the lender with:
 - i. a specified number of loans made, insured or guaranteed;
 - ii. a specified loan volume; or
 - iii. a preferred lender arrangement.
 - e. Request or accept from a lender any assistance with call center staff or financial aid office staffing, except in regard to:
 - i. professional development training for financial aid administrators;
 - ii. providing educational counseling materials, financial literacy materials, or debt management materials to borrowers (so long as the materials disclose to borrowers the identification of any lender that assisted in preparing or providing such materials); or
 - iii. staffing services on a short-term, non-recurring basis to assist the institution with financial aid related functions during emergencies.
 - f. Award any form of financial aid or scholarship, in any amount, to themselves, any immediate family members, or any person who currently cohabitates, or previously cohabitated, with the employee, officer, or agent. "Immediate family members" means relatives within the third degree of consanguinity (parent, child, brother, sister, grandparent, grandchild, great-grandparent, great-grandchild, aunt, uncle, nephew, niece) and the second degree of affinity (spouse, spouse's child, spouse's parent, spouse's brother or sister, spouse's grandparent, spouse's grandchild, child's spouse, parent's spouse, brother-in-law, sister-in-law, grandparent's spouse, grandchild's spouse).

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- g. Utilize the officer, employee, or agent's position with the University to influence the awarding of any form of financial aid or scholarship, in any amount, to themselves, any immediate family members, or any person who currently cohabitates, or previously cohabitated, with the employee, officer, or agent.

In addition to the standards set out above, all officers, employees, and agents are required to abide by the National Association of Student Financial Aid Administrators' (NASFAA) [Code of Conduct](#) (updated by NASFAA's Board of Directors, November 2019). All officers, employees, and agents should strive to meet NASFAA's [Statement of Ethical Principles](#) (updated by NASFAA's Board of Directors, November 2017) to the greatest extent possible.