

# University of Houston

## Code of Conduct for Education Loans

As active institutional members of the National Association of Student Financial Aid Administrators (NASFAA), the Financial Aid employees at University of Houston have historically prescribed to the [NASFAA Code of Conduct](#). The Code is intended to help guide Financial Aid Administrators in carrying out their obligations, particularly with regard to ensuring transparency in the administration of the student financial aid programs, integrity and ethical right action, and to avoid the harm that may arise from actual, potential, or perceived conflict of interest.

This code does not replace the provisions outlined in the University's Conflict of Interest Policy ([SAM 02.A.09](#)) applicable to all employees, but rather expands on this policy as it specifically relates to Title IV and private education loans, and to any University of Houston employees associated with the administration of education loans.

The term "employee" refers to any of the school's officers, employees and agents who are employed in the financial aid office or who have responsibilities with respect to student loans or who have responsibilities with respect to student loans related to Title IV or private education loans. The Code of Conduct establishes that employees:

1. Shall not enter into any revenue-sharing arrangement or exchange of funds for securing borrowers with any lender where the lender provides or issues a loan to the student or student's family. Or where the school recommends the lender or lender's products in exchange for a fee or material benefit (including revenue, profit sharing, extension of credit, etc.), that benefits the school, a school's employee or agent, the family of a school's employee or agent, a student, or family of a student.
2. Refrain from soliciting or from accepting any gift, service, etc.\*, from any entity (other than an institution of higher education or a governmental entity such as the U.S. Department of Education) involved in the making, holding, consolidating or processing of any student loans, including anything of value (including reimbursement of expenses) for serving on an advisory body or as part of a training activity of or sponsored by any such entity.  
\*Any gratuity, favor, discount, entertainment, hospitality, loan, services, transportation, lodging, meals, or other item.
3. Shall not accept from any lender or affiliate of any lender any fee, payment, or other financial benefit 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 education loans.

4. Shall not direct a borrower to a particular lender nor refuse to certify or delay certification of any loan based on the borrower's choice of lender.
5. The institution shall not request or accept from any lender any offer of funds to be used for private education loans to students in exchange for the institution providing concessions or promises regarding providing the lender with a specified loan volume or implementation of a preferred lender arrangement for such loans.
6. The institution must not request or accept from any lender any assistance with call center staffing or financial aid office staffing [see 34 CFR 601.21(c)(6)([i/iii](#)) for exceptions].
7. Refrain from taking any action for personal benefit, and from taking any action that one believes is contrary to law, rule, regulation, or the best interest of the student and/or parent being served.
8. Ensure that the information provided is accurate, unbiased, and does not reflect any preference arising from actual or potential personal gain.
9. Be objective in making decisions and promptly disclose to the institution, in such manner as the institution may prescribe, any involvement with or interest in any entity involved in any aspect of student financial aid.