



# TEXAS A&M UNIVERSITY SAN ANTONIO

## **Office of Student Financial Aid & Scholarships Student Loan Code of Conduct**

Texas A&M University-San Antonio has adopted this Student Loan Code of Conduct to serve as the formal guiding principles in ensuring the integrity of the student aid process and ethical conduct of employees in regard to student loan practices. The Student Loan Code of Conduct applies to all employees who work in the Office of Student Financial Aid & Scholarships and all other Texas A&M University-San Antonio employees, including agents of the University, who have responsibilities related to educational loans or other forms of student financial aid. The Student Loan Code of Conduct has been established to meet the requirements contained in the 2008 Higher Education Opportunity Act. Items in this Code of Conduct provide additional standards of conduct for employees with responsibility for student financial aid and do not replace any existing or future requirements imposed by the State of Texas related to codes of conduct, conflict of interest policies, ethics training, or other such requirements. The Student Loan Code of Conduct also confirms that Texas A&M University-San Antonio does not have preferred lender arrangements of any kind or a preferred lender list.

### **Revenue Sharing**

Texas A&M University-San Antonio shall not enter into any revenue-sharing arrangements with any lender, guarantor or servicer.

### **Gifts**

Employees of the Office of Student Financial Aid & Scholarships are prohibited from soliciting or accepting any gift from a lender, guarantor, or servicer of education loans. Gifts include any gratuity, favor, discount, entertainment, hospitality, loan or other item. This includes a gift of services, transportation, lodging, or meals, whether provided in kind, by purchase of a ticket, payment in advance, or reimbursement after the expense has incurred. Gifts to family members of a Texas A&M University-San Antonio employee are considered to be a gift to the employee if the gift is given with the knowledge and consent of the employee and there is reason to believe the gift was given because of the official position of that employee.



# TEXAS A&M UNIVERSITY SAN ANTONIO

## **Contracting Arrangements**

No UIS officer, employee, or agent employed in the Office of Student Financial Aid & Scholarships or otherwise responsible for education loans shall accept from any lender or its affiliate 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 or on behalf of a lender, guarantor, or servicer of education loans.

## **Preferred Lender Status**

The Texas A&M University-San Antonio participates in the William D. Ford Federal Direct Loan Program, which provides student and parent loans through the U.S. Department of Education. Lenders in the private student loan industry will not be given a preferred status. Texas A&M University-San Antonio does not have any preferred lender arrangements that give any lender an advantage in securing business from its students. Texas A&M University-San Antonio does not provide students a preferred lender list from which to select a lender for a private student loan. All loans are processed without regard to lender or mode of transmission (i.e., electronic or paper). Texas A&M University-San Antonio will neither recommend a private loan lender nor accept material benefits including revenue or profit sharing to the institution, an officer, or an employee of the institution or an agent.

## **Private Loan Certification**

Texas A&M University-San Antonio will not assign a borrower's private student loan to a particular lender; all decisions will be made by the borrower in his/her independent review of borrower benefits and lender services. Texas A&M University-San Antonio will not refuse to certify, or delay certification of, any loan based on the borrower's selection of a particular lender or guaranty agency.

## **Opportunity Pool Loan**

Texas A&M University-San Antonio will not request or accept from any lender any offer of funds to be used for private education loans (as defined in section 140 of the Truth in Lending Act), including funds for an opportunity pool loan to students in exchange for Texas A&M University-San Antonio providing concessions or promises regarding providing the lender with (i) a specified number of federal loans

**Revised 09/24/2024**



# TEXAS A&M UNIVERSITY SAN ANTONIO

made, insured or guaranteed; (ii) a specified federal loan volume; or (iii) a preferred lender arrangement for such loans.

## **Staffing Assistance**

Texas A&M University-San Antonio will not request or accept from any lender, guarantor, or servicer of student loans any assistance with call center staffing or financial aid office staffing.

## **Advisory Board Compensation**

Employees of the Office of Student Financial Aid & Scholarships serving on an advisory board, commission, or group established by a lender, guarantor, or group of lenders or guarantors, are prohibited from receiving 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.

## **Other Conflicts of Interest**

Texas A&M University-San Antonio has a Conflicts of Interest Policy that requires University employees to either refrain from or disclose their involvement in matters where any conflict or appearance of conflict between personal and University interests exists. In addition to this Conflicts of Interest Policy, all Texas A&M University-San Antonio officers, employees, and agents employed in the Office of Student Financial Aid & Scholarships or otherwise responsible for education loans are prohibited from having any conflicts of interest with respect to their responsibilities for Title IV education loans.

Signature of Acknowledgement: \_\_\_\_\_

*In addition to the items above, as a member of the National Association of Student Financial Assistance Administrators (NASFAA), Texas A&M University-San Antonio also follows the standards established in NASFAA's Statement of Ethical Principles and Code of Conduct for Institutional Financial Assistance Professionals.*

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