



Notre Dame College
Code of Conduct

Notre Dame College is committed to providing its students and their families with the best information and processing alternatives available regarding student borrowing. In furtherance of this goal and in an effort to truncate any perceived or actual conflict of interest between Notre Dame College officers, employees or agents and education loan lenders, Notre Dame College has adopted the following code of conduct:

1. Notre Dame College does not and shall not enter into any revenue sharing arrangements with any lender.
 - a. Pursuant to HEA Title IV, Part G, §487(25)(e)(1)(B), For purposes of this agreement the term revenue sharing arrangement means an arrangement between an institution and a lender under which (i) a lender provides or issues a loan that is made, insured, or guaranteed under this title 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, an officer or employee of the institution, or an agent.
2. No officer or employee of Notre Dame College who is employed in the financial aid office or who otherwise has responsibilities with respect to education loans, shall solicit or accept any gift from a lender, guarantor, or servicer of education loans.
 - a. Pursuant to HEA Title IV, Part G, §487(25)(e)(2)(B), a gift means any gratuity, favor, discount, entertainment, hospitality, loan, or other item having a monetary value of more than a de minimus amount. The term 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 been incurred.
 - i. The term gift does not include:
 1. Food, refreshments, training or informational material furnished to an officer or employee as part of a training session to improve the institution's services
 2. Favorable terms, conditions, and borrower benefits on an education loan provided to a student employed by the institution of such terms, conditions, or benefits are comparable to those provided to all students of the institution.
 3. Entrance and exit counseling services provided to borrowers to meet the College's responsibilities as requires by the Higher Education Act.
 4. Philanthropic contributions to an institution 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.
 5. State education grants, scholarships or financial aid funds administered by or on behalf of the state.
3. Notre Dame College does not permit its officers or employees or nay and all persons employed in the financial aid office or who has responsibilities with respect to education loans 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 educations loans.
4. Notre Dame College shall not, for any first time borrower, assign, through award packaging or other methods, 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. Notre Dame College shall 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 regarding providing the lender with (i) a specified number of loans made, insured, or guaranteed under the Higher Education Act; (ii) a specified loan volume of such loans; or (iii) a preferred lender arrangement for such loans.
 - a. The term opportunity pool loan means a private education loan made by a lender to a student attending the institution of the family member of such a student that involves a payment, directly or indirectly, by such institution of points, premiums, additional interest, or financial support to such lender for the purpose of such lender extending credit to the student or the family.
6. Notre Dame College shall not request or accept from any lender any assistance with call center staffing or financial aid office staffing.