

## **Wabash College Financial Aid Office Code of Conduct**

The Wabash College Code of Conduct, developed in accordance with 34 CFR 668.14(b)(27) and adapted from NASFAA's Code of Conduct, prohibits conflicts of interest by agents of the College related to Title IV loan programs. Specifically,

1. No action will be taken by financial aid staff that is for their personal benefit, or could be perceived to be a conflict of interest.
  - a. Financial Aid Office employees will not award aid to themselves or their immediate family members. Staff will reserve this task to the Director or Sr. Assoc. Dir. of Financial Aid to avoid the appearance of a conflict of interest.
  - b. A borrower's choice of lender will not be denied, impeded, or unnecessarily delayed by Wabash.
  - c. No amount of cash, gift or benefit in excess of a de minimis amount shall be accepted by a financial aid staff member from any financial aid applicant (or the student's family), or from any entity doing business with or seeking to do business with the College (including service on advisory committees or boards beyond reimbursement for reasonable expenses directly associated with such service).
2. Information provided by the Financial Aid Office is accurate, unbiased, and does not reflect preference arising from actual or potential personal gain.
3. Wabash financial aid offers and/or other institutionally-provided materials shall include the following:
  - a. Breakdown of estimated individual COA components, designating which are direct (billed by Wabash) vs. indirect (not billed by Wabash) costs
  - b. Clear identification and proper grouping of each type of aid, indicating whether the aid is grant/scholarship, loan, or work
  - c. Estimated net price
  - d. Standard terminology and definitions using NASFAA's glossary of terms
  - e. Renewal requirements for each type of aid being offered, as well as next steps and financial aid contact information
4. All required consumer information is displayed in a prominent location on the Wabash web site and any printed materials. Information is easily identified and found, and labeled as "Consumer Information"
5. Financial aid staff will disclose to the College any involvement, interest in, or potential conflict of interest with any entity with which the College has a business relationship.

Wabash College does not have special arrangements with providers of student loans. Examples of special arrangements could include: a) revenue sharing between the school and lender, b) special arrangements for private loans based on loan volume, c) contracting arrangement for compensation for school staff, d) use of call centers staffed by lenders, and e) accepting of gifts above nominal value (e.g. pens).

The Wabash College Financial Aid Office does not automatically assign, nor recommend, a lender as students apply for private education loans. We will process a loan based on the student's choice of borrower. There will be no intentional delay in certification of a loan based on a student's preference.

College staff will not accept compensation for service on advisory boards for any lender. It is permissible to receive reasonable compensation for travel expenses related to board participation.