

## **Mercy College Student Loan Code of Conduct**

Neither Mercy College as an institution nor any individual officer, employee or agent shall enter into any revenue-sharing arrangements with any lender.

- Revenue-sharing arrangement includes circumstances where an institution recommends a lender or the loan products of a lender who provides or issues a loan in exchange for a fee or provision of material benefits, including revenue or profit sharing, to the institution, or employee or agent of the institution.

No officer or employee of Mercy College who is employed in the Financial Aid Office or who otherwise has responsibilities with respect to education loans, or agent who has responsibilities with respect to education loans, or any of their immediate family members, shall solicit or accept any gift from a lender, guarantor, or servicer of education loans.

- For purposes of this prohibition, the term "gift" means any gratuity, favor, discount, entertainment, hospitality, loan, or other item having a monetary value of more than a de minimis 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.)

An officer or employee of Mercy College who is employed in the Financial Aid Office or who otherwise has responsibilities with respect to education loans, or an agent 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 (including the opportunity to purchase stock) 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.

Mercy 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.

Mercy 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:

- A specified number of loans made, insured, or guaranteed under Title IV;
- A specified loan volume of such loans; or
- A preferred lender arrangement for such loans.
- "Opportunity pool loan" means a private education loan made by a lender to a student attending the institution or 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. (20 U.S.C.A. §1094(e)(5)(B)).

Mercy College shall not request or accept from any lender any assistance with call center staffing or Financial Aid Office staffing.

Any Mercy College employee who is employed in the Financial Aid Office, or who otherwise has responsibilities with respect to education loans or other student financial aid, and who serves on an advisory board, commission, or group established by a lender, guarantor, or group of lenders or guarantors, shall be 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.

- Any and all reimbursement received for any service on advisory boards, commissions or other groups by lenders, servicers or guarantors must be reported annually to the Department of Education by Mercy College.