

# WAYNE STATE UNIVERSITY

The Wayne State University Office of Student Financial Aid follows WSU University Policies, which include prohibitions on conflict of interest. In addition, as a member of the National Association for Student Financial Aid Administrators (NASFAA) we follow the NASFAA Statement of Ethical Principles and Code of Conduct for Institutional Financial Aid Professionals.

## Code of Conduct

This code of conduct is applicable to all officers, employees and agents of Wayne State University and any affiliated organizations with responsibilities (directly or indirectly) with respect to education loans. University officers, employees and agents subject to this policy are prohibited from doing any of the following, either on their own behalf or on behalf of Wayne State University:

### (1) BAN ON REVENUE-SHARING ARRANGEMENTS -

(A) PROHIBITION - Wayne State University or any officer, employee, or agent subject to this policy shall not enter into any revenue-sharing arrangement with any lender.

(B) DEFINITION - For purposes of this paragraph, the term 'revenue-sharing arrangement' means an arrangement between Wayne State University 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 Wayne State University or to the families of such students; and

(ii) Wayne State University 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 Wayne State University, an officer or employee of Wayne State University, or an agent.

### (2) GIFT BAN -

(A) PROHIBITION - No officer or employee of Wayne State University who is employed in the financial aid office of the University or who otherwise has responsibilities with respect to education loans, or agent who has responsibilities with respect to education loans, shall solicit or accept any gift from a lender,

guarantor, or servicer of education loans.

(B) DEFINITION OF GIFT -

(i) IN GENERAL- In this paragraph, the term '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.

(ii) EXCEPTIONS - The term 'gift' shall not include any of the following:

(I) Standard material, activities, or programs on issues related to a loan, default aversion, default prevention, or financial literacy, such as a brochure, a workshop, or training.

(II) Food, refreshments, training, or informational material furnished to an officer or employee of Wayne State University, or to an agent, as an integral part of a training session that is designed to improve the service of a lender, guarantor, or servicer of education loans to Wayne State University, if such training contributes to the professional development of the officer, employee, or agent.

(III) Favorable terms, conditions, and borrower benefits on an education loan provided to a student employed by Wayne State University if such terms, conditions, or benefits are comparable to those provided to all students of the University.

(IV) Entrance and exit counseling services provided to borrowers to meet Wayne State University's responsibilities for entrance and exit counseling, as long as--

(aa) Wayne State University's staff are in control of the counseling (whether in person or via electronic capabilities); and

(bb) such counseling does not promote the products or services of any specific lender.

(V) Philanthropic contributions to Wayne State University 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.

(VI) State education grants, scholarships, or financial aid funds administered by or on behalf of a State.

(iii) RULE FOR GIFTS TO FAMILY MEMBERS - For purposes of this paragraph, a gift to a family member of an officer or employee of Wayne State University, to a family member of an agent, or to any other individual based on that individual's relationship with the officer, employee, or agent, shall be considered a gift to the officer, employee, or agent if--

(I) the gift is given with the knowledge and acquiescence of the officer, employee, or agent; and

(II) the officer, employee, or agent has reason to believe the gift was given because of the official position of the officer, employee, or agent.

(3) CONTRACTING ARRANGEMENTS PROHIBITED -

(A) PROHIBITION<sup>1</sup> - An officer or employee who is employed in the financial aid office of Wayne State University 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.

(4) INTERACTION WITH BORROWERS - Wayne State University shall not--

(A) for any first-time borrower, assign, through award packaging or other methods, the borrower's loan to a particular lender; or

(B) refuse to certify, or delay certification of, any loan based on the borrower's selection of a particular lender or guaranty agency.

(5) PROHIBITION ON OFFERS OF FUNDS FOR PRIVATE LOANS -

(A) PROHIBITION - Wayne State University shall 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 the institution providing concessions or promises regarding providing the lender with--

(i) a specified number of loans made, insured, or guaranteed under this title;

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<sup>1</sup> The Higher Education Opportunity Act allows for exceptions in certain circumstances.

(ii) a specified loan volume of such loans; or

(iii) a preferred lender arrangement for such loans.

(B) DEFINITION OF OPPORTUNITY POOL LOAN - In this paragraph, the term '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.

(6) BAN ON STAFFING ASSISTANCE -

(A) PROHIBITION- Wayne State University shall not request or accept from any lender any assistance with call center staffing or financial aid office staffing.

(B) CERTAIN ASSISTANCE PERMITTED - Nothing in paragraph (1) shall be construed to prohibit Wayne State University from requesting or accepting assistance from a lender related to--

(i) professional development training for financial aid administrators;

(ii) providing educational counseling materials, financial literacy materials, or debt management materials to borrowers, provided that such materials disclose to borrowers the identification of any lender that assisted in preparing or providing such materials; or

(iii) staffing services on a short-term, nonrecurring basis to assist Wayne State University with financial aid-related functions during emergencies, including State-declared or federally declared natural disasters, federally declared national disasters, and other localized disasters and emergencies identified by the Secretary.

(7) ADVISORY BOARD COMPENSATION - Any employee who is employed in the financial aid office of Wayne State University, or who otherwise has responsibilities with respect to education loans or other student financial aid of Wayne State University, 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. immediatly