

**University of St. Thomas (UST)**  
**Enrollment Services (Undergraduate Admissions and Financial Aid)**  
**Code of Conduct and Ethical Behavior**

The University of St. Thomas believes in helping students achieve their educational potential, goals and dreams. To that end, the members of the Enrollment Services Division (Undergraduate Admissions and Financial Aid) serve as a resource to students, parents, school counselors, community members, etc. and provide guidance, counseling and support to those in need of financial aid or financing options to attend college.

One of the objectives of the Enrollment Services Division is to provide accurate and timely information to students and parents (and other internal and external constituencies) concerning federal, state and institutional financial aid programs including scholarships, grants, student employment and loans. A secondary objective (of equal importance) is to make certain that the members of the Division act in an ethical matter specifically as it relates to the guidance offered on the subject of student and parent loans.

Enrollment Services attempts to provide objective information in a professional manner to assist students and parents as they make important college selection, financial aid and financing decisions.

This UST Code of Conduct is intended to provide guidance to the Enrollment Services Division so that all members of the team may operate in conformance with the highest professional standards and utilizing best practices.

**A. Prohibition of Certain Remuneration to Department Employees**

No Enrollment Services employee will accept anything of more than nominal value (not to exceed \$100 per year) from a lending organization. In addition, Enrollment Services employees will not accept any payment or reimbursement by a lending organization for:

- Lodging
- Meals
- Travel to conferences or training seminars unless such payment or reimbursement is related solely to non-UST business

Employees may accept business meals at a meeting, conference or seminar related to their professional development or training if an otherwise scheduled business meeting continues through meal time and it would serve a business purpose to continue the meeting uninterrupted.

Employees are not precluded from attending any educational training program where the registration fee has been waived for all attendees because of a lending organization's sponsorship or support of the program. Employees are not prohibited from conducting non-UST business with a lending organization.

#### B. Limitations on UST Employees Participating on Lender Advisory Boards

No employee of the Division may receive any remuneration or reimbursement of expenses for serving as a member or participant of a lender's advisory board related to financial aid or higher education loans, other than a meal at an advisory board meeting. The same limitation is in place for work done with guarantor advisory boards.

#### C. Prohibition of Certain Remuneration to the University

The Enrollment Services Division cannot accept on its own behalf anything of value from any lender in exchange for any advantage or consideration provided to the lender related to its education loan activity. The prohibition will include, but not be limited to:

- Revenue sharing
- The Division's receipt from any lender of equipment or supplies, including without limitation, computer hardware for which the Division pays below-market prices
- Printing costs or services

The Division is not prohibited from accepting a lender's own printed brochures or informational materials that do not contain the UST logo or otherwise identify the university. This does not prohibit the university from accepting endowment gifts, capital contributions, scholarship funding, or other financial support from a lender so long as the Division gives no advantage or consideration to the lender related to its education loan activity in exchange for such support.

The Division may accept assistance comparable to the kinds of assistance provided by the Secretary of the U.S. Department of Education to schools under or in furtherance of the Federal Direct Loan Program.

#### D. Lender Lists

The University of St. Thomas is a participant in the William D. Ford Direct Loan program for all of its Federal Stafford, Federal Graduate Plus and Federal Parent Plus loans. No list for these loans is necessary.

The Division does prepare and post a list of private lenders who offer private or alternative loan funds to our students.

In compliance with regulation, the Division posts disclosures and adheres to federal policy regarding lender lists as noted:

- Every brochure, web page or other document that sets forth a Lender List *must clearly disclose the process by which the Division selected lenders* for the list, including but not limited to the criteria used in compiling the list.
- Every brochure, web page or other document that sets forth a Lender List or identifies any lender as being on the Lender List will state in the same font and at least the same size as the predominant text on the document that students and their parents have the right and opportunity to select the education loan provider of their choice and will suffer no penalty from the university if the loan application is completed in a timely manner.
- The Division's list of lenders for private/alternative loans will be based solely on our understanding of what is in the best interest of the student and parent borrowers and our loan volume history.
- The Division will review its Lender List at least every three years beginning with the 2009-2010 academic year. In the event that lenders leave the marketplace, we will review the list more frequently.

The University of St. Thomas, trusts that lenders will follow the letter and spirit of the law for full disclosure to borrowers as required by the U.S. Department of Education.

#### E. Prohibition of a Lender's Staffing of the Division

No employee or other agent of a lender may staff the Division at any time. The Division will ensure that no employee or other lender representative is ever identified to students (enrolled or prospective) or their parents as an employee or agent of the Division.

If the Division believes that it would benefit students, representatives of lenders may conduct informational sessions, such as exit interviews and presentations on loan payment and consolidation options so long as:

- Student attendance is voluntary
- The affiliation of the lender representative is disclosed at the start of the presentation
- A Division representative explains that other lenders may provide similar services
- The lender representative does not solicit consolidations or offer other loan services at the time of the presentation

F. Master Promissory Notes

Students and parents who participate in the Federal Direct Loan Program will complete electronic master promissory notes. Information about this process is on our web site and is included in our communication plan to both currently enrolled and prospective students.

In addition to any other links provided on the Division's web site, the Division will work with borrowers to ensure completion of an electronic master promissory note whenever possible with the private/alternative lender they (student and/or parent) have chosen.

In the event that the borrower most prefers to complete and submit a paper loan application, said loan will be processed as quickly and efficiently as possible without the full benefit of electronic support.

I, the undersigned employee, have read this document and understand that I am required to act within the boundaries of its content or face the potential of dismissal. Ethical behavior is an expectation of my employer and a condition of my employment.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_