

Carnegie Mellon University

Carnegie Mellon University Federal and Private Loans and Lender Relationships Code of Conduct

Carnegie Mellon University (“Carnegie Mellon”) seeks to help students and their families identify the most competitive and reliable lenders from which to borrow funds for education. The purpose of this Code of Conduct is to restate existing policies concerning standards of business conduct and to expand Carnegie Mellon’s financial aid policies to include the provisions required by section 487 of the Higher Education Opportunity Act.

1. Conflict of Interest:

All employees, officers and agents of Carnegie Mellon must comply with the University’s [Policy on Conflict of Interest/Commitment](#) with respect to any education loan or financial aid service.

2. Revenue Sharing Prohibited:

Carnegie Mellon may not receive anything of value from any lending institution in exchange for any advantage sought by the lending institution with respect to education loans or financial aid services.

3. Prohibited Gifts:

- a. No employee, officer or agent of Carnegie Mellon who has responsibilities with respect to education loans or financial aid services shall solicit or accept any gift from any lending institution.
- b. Prohibited gifts include, but are not limited to, transportation, lodging, meals, entertainment, discounts, loans, favors or any other item having a monetary value of more than a de minimus amount.
- c. Notwithstanding the foregoing, professional training, informational and financial literacy materials, food or refreshments provided at trainings, borrower benefits and exist counseling services are not prohibited gifts under this code.

4. Contracting Arrangements Prohibited:

No employee, officer or agent of Carnegie Mellon who has responsibilities with respect to education loans or financial aid services shall accept from any lending institution any fee, payment, or other financial benefit as compensation for any type of consulting arrangement or other contract to provide services to any lending institution relating to education loans.

5. Interaction with Borrowers:

- a. Carnegie Mellon shall not for any first-time borrower, assign, through award packaging or other methods, the borrower's loan to a particular lending institution.
- b. Carnegie Mellon shall not refuse to certify or delay certification of, any loan based on the borrower's selection of a particular lending institution.

6. Funds for Private Loans:

Carnegie Mellon shall not request or accept any offer of funds to be used for private education loans or opportunity pool loans in exchange for providing with a lending institution with a specified number of loans, a specified loan volume or a preferred lender arrangement.

7. Staffing Assistance:

Carnegie Mellon shall not request or accept from any lending institution any assistance with call center staffing or financial aid office staffing.

8. Advisory Board Compensation:

No employee of Carnegie Mellon who has responsibilities with respect to education loans or financial aid services may receive anything of value in compensation for service on an advisory board, commission, or group established by a lending institution or group of lending institutions, except that that employees may be reimbursed for reasonable expenses incurred in serving on such advisory board, commission or group.

9. Co-Branding:

Consistent with the [Policy for Use of Carnegie Mellon Trademarks](#), "the university's trademarks are not to be used in the name of a business, logo, in advertising services or on a product in a way that could state or imply an endorsement."

In addition, Carnegie Mellon shall not permit a lending institution to use Carnegie Mellon's name, emblem, mascot, or logo in connection with the marketing of private education loans in any way that implies that Carnegie Mellon endorses the private education loans offered by the lending institution.