WJU’s Financial Aid Code of Conduct for Education Loans

The Higher Education Opportunity Act of 2008 (HEOA) requires educational institutions to develop and follow a code of conduct that prohibits conflicts of interest for financial aid employees [HEOA §487(a) (25)]. Any Wheeling Jesuit University employee who has responsibilities with respect to student educational loans must comply with this code of conduct.

1. Wheeling Jesuit University as neither an institution nor any of its officers or employees shall enter into any revenue-sharing arrangements with any lender.

2. No Financial Aid officer or employee of Wheeling Jesuit University, or anyone who has responsibilities with respect to education loans or any of their family members, shall receive or accept any gift from a lender, guarantor, or servicer of education loans. The term “gift” means any gratuity, favor, discount, entertainment, hospitality, loan, or other item having a monetary value.

3. A Financial Aid officer or employee of Wheeling Jesuit University or anyone who has responsibilities with respect to education loans, will not accept from any lender or affiliate of any lender any fee, payment, or any 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. Wheeling Jesuit University will 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. Wheeling Jesuit University will 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. a specified number of loans made, insured, or guaranteed under Title IV;
   b. a specified loan volume of such loans; or
   c. a preferred lender arrangement for such loans.

6. Wheeling Jesuit University will not request or accept from any lender any assistance with call center staffing or financial aid office staffing.
7. Any 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, will 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.