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CODE OF CONDUCT FOR EDUCATION LOANS

Title 34 of the Code of Federal Regulations, section 601.21, require the development, administration, and enforcement of a code of conduct governing educational loan activities. Employment Solutions, Inc./College for Technical Education, its officers, employees, trustees and agents, agree to the provisions of this code of conduct:

- The College will prohibit a conflict of interest with the responsibilities of the Financial Aid office and Admissions, in regards to the funding of Federal loan programs and ties to the admissions process.
- The College will continue to publish the code of conduct prominently at www.CTE.edu.
- Employment Solutions Inc., will enforce such code by requiring that all of the institution's agents with responsibilities with respect to FFEL Program loans or private education loans be annually informed of the provisions of the code of conduct.
- The College will ensure that any outside parties, including third party processors, are informed of the Code of Conduct and abide by its provisions.

Employment Solutions, Inc./College for Technical Education prohibits:

- Revenue-sharing arrangements with any lender to include a lender in which the institution 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 the institution, an agent;
- Employees of the financial aid office are prohibited from receiving gifts from a lender, a guarantor, or a loan servicer. Employees in the financial aid office of the institution, or who otherwise have responsibilities with respect to FFEL Program loans or private education loans, must not solicit or accept any gift from a lender, guarantor, or servicer of FFEL Program loans or private education loan. This includes gifts meaning any gratuity, favor, discount, entertainment, hospitality, loan, or other item having a monetary value of more than a \$1.00. 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. The term gift does not include any of the following: 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. Food, refreshments, training, or informational material furnished 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 FFEL Program

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loans or private education loans to the institution, if such training contributes to the professional development of the agent.

- Entrance and exit counseling services provided to borrowers to meet the institution's responsibilities for entrance and exit counseling as required by §§682.604(f) and 682.604(g), as long as the institution's staff are in control of the counseling (whether in person or via electronic capabilities) and such counseling does not promote the products or services of any specific lender.
- Philanthropic contributions to an institution from a lender, servicer, or guarantor of FFEL Program loans or private education loans that are unrelated to FFEL Program loans or private education loans or any contribution from any lender, servicer, or guarantor, that is not made in exchange for any advantage related to FFEL Program loans or private education loans.
- An employee in the financial aid office of the institution or who otherwise has responsibilities with respect to FFEL Program loans or private education loans must 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 FFEL
- An employee who is employed in the institutions financial aid office and does not have other responsibilities to the FFEL Program loans may not serve on the board of directors of a lender, guarantor or service education loans.
- Employment Solutions, Inc./College for Technical Education may not refuse to certify or delay certification of any loan based on the borrowers personal selection of loan or particular lender. In addition, the Financial Aid office for any first-time borrower, assign, through award packaging or other methods, the borrower's loan to a particular lender.
- The institution will not request or accept any offer of funds, from any lender, 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 FFEL Program loans or private education loans, a specified loan volume of such loans, or a preferred lender arrangement for such loans.
- The College must not request or accept any assistance from any lender, with call center staffing or financial aid office staffing. The College may accept assistance from a lender related to professional development training for financial aid administrators; 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.

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- It is also not prohibited to receive staffing services on a short-term, nonrecurring basis to assist the institution 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 as identified by the Secretary.
- Any employee who may serve as an advisor and is employed in the financial aid office of the institution, or who otherwise has responsibilities with respect to FFEL Program loans or private education loans or other student financial aid of the institution, and who serves on an advisory board, commission, or group established by a lender, guarantor, or group of lenders or guarantors, must not receive anything of value except that the employee may be reimbursed for reasonable expenses, as that term is defined in §668.16(d)(2)(ii), incurred in serving on such advisory board, commission, or group.
- State education grants, scholarships, or financial aid funds administered by or on behalf of a State; and for purposes understanding, a gift to a family member of an employee, or to any other individual based on that individual's relationship with the employee, is considered a gift if the gift is given with the knowledge of the employee and has reason to believe it was given based upon their official position as an employee of Employment Solutions, Inc./College for Technical Education in a financial aid capacity.