

Re: Higher Education Opportunity Act (HEOA) 2008

**Provisions Pertaining to
Institution-Affiliated Organizations***

Policy and Procedures

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C. Use of lender name

An institution-affiliated organization* that enters into a preferred lender arrangement with a lender regarding private education loans shall ensure that the name of the lender is displayed in all information and documentation related to such loans.

D. Code of Conduct

Each institution-affiliated* organization shall comply with the code of conduct developed and published by the University under subparagraphs (A) and (B) of section 487 (a) (25) of HEOA 2008.

If the affiliate has a website, the affiliate must publish such code of conduct prominently on the website.

II. PURPOSE

The purpose of this policy is compliance with Higher Education Opportunity Act of 2008 provisions pertaining to institution-affiliated* organizations.

III. PROCEDURES

The chief financial officer of the University is compliance officer for institution-affiliated organizations*.

The compliance officer is required to perform annual due diligence to ensure that all relationships of University affiliation are documented. Due diligence is conducted in May, the last period of the fiscal year. It includes documenting interviews with peer University officers and securing data collection forms from them to ensure that every division is reviewed for the existence of such relationships.

The compliance officer is required to inform annually in writing all University institution-affiliated organizations* about their responsibilities, as outlined in the policy, with respect to disclosures of preferred lender arrangements and private education loans, use of the University name, and use of lender names.

The compliance officer is required to inform annually in writing all University institution-affiliated organizations* of the provisions of the code of conduct, and the requirement that such code must be prominently published on the affiliated organization's website if they have a website.

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*** Term Definition**

In accordance with Section 151 – Definitions of the HEOA 2008, the term **institution-affiliated organization** means any organization that is directly or indirectly related to the University, and is engaged in the practice of recommending, promoting, or endorsing education loans for students attending the University or the families of such students. This may include an alumni organization, athletic organization, foundation, or social, academic, or professional organization of the University. It does not include any lender with respect to any education loan secured, made, or extended by such lender.