



Covenant Seminary Student Loan Code of Conduct

This code of conduct applies to all seminary employees, officers, and agents—particularly to all who have responsibilities with respect to Federal Student Aid and student loans.

In order to ensure transparency in the administration of the student financial aid program and to avoid the harm that may arise from actual, potential, or perceived conflicts of interest, Covenant Seminary has adopted the following code of conduct.

- Covenant Seminary shall not enter into a revenue-sharing arrangement which is defined as an arrangement between a school and a lender under which the lender pays a fee or provides other material benefits, including revenue or profit sharing to the school, an officer or employee of the school, or an agent and, in exchange, the school recommends the lender or the lender's loan products and the lender makes loans to the student attending the school.
- Any officer or school employee who is employed in the financial aid office or who has responsibilities with respect to student loans is prohibited from soliciting or accepting anything of more than nominal value from a lender, guarantor, or servicer of education loans.
- An officer or employee of the financial aid office or who has responsibilities with respect to education loans or an agent who has responsibilities with respect to education loans shall not accept any fee, payment, or other financial benefit (including the opportunity to purchase stock) as compensation from any lender or affiliate for any type of consulting arrangement or other contract to provide services to the lender or on behalf of the lender with regard to education loans.
- Covenant Seminary shall not request or accept funds from any lender for private education loans including funds for an opportunity pool loan to its students in exchange for the school providing concessions or promises to the lender regarding the number or volume of loans or a preferred lender arrangement.

- The Financial Aid Office personnel will not assign, deny or otherwise impede a borrower's right to choose a particular lender.
- Requests or acceptance of any assistance from any lender with call center or financial aid office staffing is prohibited.
- Any school employee, in the financial aid office or with responsibilities regarding education loans or financial aid, who serves on an advisory board, commission, or group established by student loan lenders or guarantors shall be prohibited from receiving anything of value from those lenders or guarantors. However, the employee may be reimbursed for reasonable expenses incurred in serving on the advisory board, commission, or group.