



CODE OF CONDUCT FOR PRIVATE EDUCATION LOANS

Purpose

The purpose of this Code of Conduct is to establish clear guidelines for the ethical and transparent administration of private education loans at Eastern International College (EIC). The college is committed to ensuring that all financial aid processes, including those involving private loans, are conducted with integrity, fairness, and in the best interest of students.

This policy emphasizes transparency, fairness, and student well-being, which will help maintain trust and ethical standards in the private loan process at Eastern International College

Scope

This policy applies to all employees, contractors, and agents involved in the private education loan process at Eastern International College, including but not limited to the Financial Aid Office, loan counselors, and admissions staff.

1. Prohibition of Conflicts of Interest

EIC prohibits any conflict of interest in the private loan process. Specifically,

- No Gifts or Incentives: EIC employees and affiliates must not accept any gifts, financial incentives, or benefits from private education loan lenders. This includes commissions, fees, or other forms of compensation.
- No Endorsements: EIC will not endorse, promote, or recommend any specific lender for private loans. The selection of lenders will be based solely on the interests of students and their financial needs.

2. Lender Selection and Transparency

EIC will ensure that the process of selecting lenders for private loans is clear, transparent, and based on objective criteria. The college will:

- Provide students with information about private loan options, including interest rates, fees, repayment terms, and eligibility criteria.
- Ensure that students have access to a list of lenders that meet the needs of the student body, with no preference for one lender over another unless based on the terms and benefits offered.

3. No Revenue Sharing or Kickbacks

EIC will not engage in any revenue-sharing agreements with private loan lenders. The college will not receive compensation, financial or otherwise, for recommending or promoting specific lenders. All agreements related to private loans will prioritize students' financial well-being over any potential financial benefit to the college.

4. No Coercion of Students

Students will not be coerced or unduly influenced to take out private loans. EIC will provide counseling to students about their federal loan eligibility and the differences between federal and private loans. Students will be informed of their rights and responsibilities in taking out any private loan, and no student will be required to take out a private loan as a condition of enrollment or continued enrollment.

5. Disclosure of Loan Terms

EIC will ensure that students have access to clear and detailed information about private education loans, including:

- A summary of all loan terms, such as interest rates, fees, repayment options, and deferment or forbearance provisions.
- A statement that the student is aware of their right to seek financial advice before selecting a private loan lender.
- Information regarding the students' rights to cancel a private loan.

6. Counseling and Financial Literacy

EIC will provide adequate counseling services to students who are considering private education loans. This includes:

- Offering information on how to assess loan options, understanding terms and conditions, and understanding the financial impact of taking on a private loan.
- Assisting students in understanding the difference between federal student loans and private loans, including the benefits of federal loans (such as income-driven repayment plans and federal loan forgiveness).

7. Prohibited Consulting or Contracting Arrangements

No officer or employee of EIC who is employed in the financial aid office or otherwise has responsibilities with respect to education loans shall 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 consulting arrangement or other contract to provide services to or on behalf of a lender relating to education loans

8. Prohibited Offers of Funds for Private Loans

EIC will not accept or request from any lender any offer of funds for private education loans, including funds for opportunity pool loans, in exchange for a promise of a specified number of loans, volume of loans, or placement on a preferred lender list.

9. Prohibited Staffing Assistance

EIC will not request or accept from any lender any assistance with staffing for financial aid office functions. This includes but is not limited to:

- Providing staff for call centers or financial aid offices.
- Assistance in compiling or distributing financial aid materials.

Exceptions may include:

- Professional development training.

- Educational advising tools provided the lender does not promote its own products.

10. Advisory Board Compensation

No employee of EIC who serves on an advisory board, commission, or group established by a lender or group of lenders shall receive anything of value from the lender, except reimbursement for reasonable expenses incurred in serving in such capacity.

11. Compliance with Regulations

EIC will comply with all federal, state, and institutional regulations regarding private education loans, including but not limited to the Higher Education Opportunity Act (HEOA) and applicable consumer protection laws.

12. Reporting Violations

Employees and students who suspect violations of this Code of Conduct are encouraged to report concerns through the college's established grievance or compliance procedures. The college will ensure that no retaliatory actions will be taken against anyone reporting in good faith.

13. Policy Review and Updates

This policy will be reviewed annually (and as needed) and updated as necessary to ensure compliance with current regulations and best practices. Any changes will be communicated to students and employees in a timely manner.