Institutional Code of Conduct for Education Loans

William Penn University

Prepared by:
Iowa College Student Aid Commission, in consultation with the Iowa Attorney General's Office.

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Introduction

Iowa Code Section 261F.2, Sections 487(a)(25)(A) and 487(e) of Title IV of the Higher Education Act (HEA), and federal regulations contained in 34 CFR 668.14(b)(27), and 34 CFR 601.21 require **William Penn University** (referred to throughout this document as "the institution") to develop, administer, and enforce a Code of Conduct. The Code of Conduct sets forth standards for business relationships between colleges and universities, their affiliated organizations and entities and private entities that make or hold education loans (referred to throughout this document as "lender").

A *private education loan* is any loan that is not made under Title IV of the HEA and is issued to a borrower expressly for postsecondary education expenses, regardless of whether the loan is provided through the institution that the student attends or directly to the borrower from the lender. A private loan secured by a dwelling or an extension of credit under an open-end consumer credit plan (e.g., a home equity line of credit, or open line of credit tied to a Certificate of Deposit) is not considered a private education loan.

Iowa Code Section 261.F1(10)

All of the following individuals or entities associated with the institution must comply with this code of conduct governing education loan activities:

- An employee
- A contract employee
- A director or officer
- A trustee
- An agent – including an "institution-affiliated organization" (see below), booster club, or other organization directly or indirectly associated with or authorized by the institution or an employee of the institution

An *institution-affiliated organization* is an organization that is directly or indirectly affiliated with us and includes, but is not limited to, an alumni, athletic, social, academic, or professional organization.

Iowa Code Sections 261F.2(1) and 261F.1(2) and (3); 34 CFR 601.2 definition of institution-affiliated organization

Distribution Requirements

This code of conduct will remain published prominently on our Internet site.

Iowa Code Section 261F.2(1)(b) ; 34 CFR 601.21(a)(2)(ii)

If an institution-affiliated organization (see above) participates in a preferred lender arrangement*, and that organization has a Web site, our Code of Conduct must be published on the institution-affiliated organization's Web site.

34 CFR 601.21(b)(2)

At least annually, **William Penn**'s officers, employees, and agents who have responsibilities for education loans must be informed of the provisions of this code of conduct. An institution-affiliated organization (see above) that participates in a preferred lender arrangement* must notify its officers,

employees, and agents who have responsibilities for education loans of the provisions of this Code of Conduct at least annually.

34 CFR 601.21(a)(2)(iii) and (3)

*See "Preferred Lender Arrangements" for more information.

Gifts

Impermissible Activities

An officer, employee, or agent of **William Penn** who is employed in the financial aid office or who otherwise has direct responsibilities with respect to education loans must not solicit or accept any gift from a lender, lender servicer, or guarantor. See exceptions below under "Permissible Activities."

Gifts to Family Members or Others
A gift to a family member of the institution's officer, employee, or agent, or a gift to an individual based on that individuals' relationship with the institution's officer, employee, or agent is not permissible if **either** of the following applies:

- The gift is given with the knowledge and acquiescence of the institution's officer, employee, or agent, **or**
- The officer, employee, or agent has reason to believe the gift was given because of that person's official position with the institution.

Gift Definition
A gift means any gratuity, favor, discount, entertainment (including expenses for shows, sporting events, or alcoholic beverages), hospitality (including private parties of select training or conference attendees), loan, or other item having a monetary value of more than a "de minimus" or nominal value[1]. A gift includes 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.

Iowa Code Sections 261F.1(5) and 261F.3(1) and (2); HEA Section 487(e)(2); 34 CFR 682.200(b) Definition of "Lender" (5)(i)(A)(8); 34 CFR 682.401(e)(1)(i)(D); 34 CFR 601.21(c)(2)(i) and (ii); November 1, 2007, Federal Register, Vol. 72, No. 211, p. 61981

Permissible Activities

An officer, employee, or agent of the institution, or a member of an organization affiliated with the institution, may accept items of a "de minimus" or nominal[1] value from a lender, lender servicer, or guarantor that are offered as a form of generalized marketing or advertising or to create good will.

Examples of permissible gifts include, but are not limited to, the following:

- Pens or pencils
- Notepads; sticky-notes
- Calculators
- Small Tote bags
- Other individual office supply items

[1]"De minimus" or nominal value is undefined in Iowa Code, federal law or the U.S. Department of Education's regulations (34 CFR 601.21). Employees of state agencies should consult their personnel policies for any additional restrictions on the acceptance of gifts.

An employee of the institution may also accept items of value from a lender, lender servicer, or guarantor that are also offered to the general public.

Iowa Code Section 261F.1(5)(l) and (m); HEA Section 487(e)(2)(B); 34 CFR 682.200(b) Definition of "Lender" (5)(ii)(J); 34 CFR 682.401(e)(2)(ix)

Philanthropic Gifts/Contributions to the Institution

Impermissible Activities

The institution will not accept philanthropic contributions from a lender, lender servicer, or guarantor that are related to the education loans the lender, lender servicer, or guarantor provides to our students and families, or that are made in exchange for any advantage related to education loans.

Iowa Code Section 261F.1(5)(d); HEA Section 487(e)(2)(B)(ii)(V); 34 CFR 601.21(c)(2)(iii); 34 CFR 682.200(b) Definition of "Lender" (5)(i)(A)(9); 34 CFR 682.401(e)(1)(i)(E)

Permissible Activities

The institution may accept philanthropic contributions from a lender, lender servicer, or a guarantor that are not related to the education loans provided by the lender or guarantor, and that are not made in exchange for any advantage to the lender, guarantor, or servicer. However, we must disclose philanthropic contributions made to our institution by an education lender with whom we have a preferred lender arrangement* under rules https://www.legis.iowa.gov/docs/iac/chapter/12-04-2019.61.37.pdf established by the Iowa Attorney General.

*See "Preferred Lender Arrangements" for more information.

Iowa Code Sections 261F.1(5)(d) and 261F.4(6); 34 CFR 601.21(c)(2)(iii)

Advisory Councils

Impermissible Activities

An officer, employee, or agent of the institution who is employed in the financial aid office or who otherwise has direct responsibilities with respect to education loans must not serve on or otherwise participate in an advisory council established by a lender or its affiliate, or a group of lenders.

Iowa Code Section 261F.3(6)

An officer, employee, or agent of the institution who serves on an official, standing advisory council for a guarantor must not accept anything of value for that service. See the exception below for reasonable compensation under "Permissible Activities."

HEA Section 487(e)(7); 34 CFR 601.21(c)(7)

Permissible Activities

An officer, employee, or agent of the institution who is employed in the financial aid office, or who otherwise has responsibilities with respect to education loans or other financial aid offered to our

students and their families may serve on an official, standing advisory council for a guarantor, including an Iowa College Student Aid Commission advisory council or task force, and be compensated for reasonable expenses incurred in that service.

Expenses are considered reasonable if they meet the standards of and are paid according to a State government reimbursement policy that governs the entity offering reimbursement. If no State government reimbursement policy applies to the entity which offers reimbursement, expenses are reasonable if they meet the standards of and are paid according to applicable Federal cost principles.

34 CFR 601.21(c)(7); 34 CFR 668.16(d)(2)(ii); 34 CFR 682.401(e)(2)(vi)

An officer, employee or agent of the institution may respond to any lender who seeks advice from the institution or groups of institutions by telephone, electronically, or in a meeting, about improving products or services for borrowers. However, the institution may not accept any gift or compensation for responding to the lender including, but not limited to, transportation, lodging, or related expenses.

Iowa Code Section 261F.3(6)

Boards of Directors

Impermissible Activities

Lender, Lender Servicer, and Guarantor
An employee or agent of the institution who is employed in the financial aid office must not serve on or otherwise participate in the board of directors of a lender, lender servicer, or guarantor.

An employee or agent of the institution who is not employed in the financial aid office but who has responsibility with respect to education loans must not serve on or otherwise participate in the board of directors of a lender, lender servicer, or guarantor, unless we have a written conflict of interest policy.

This institution has a written conflict of interest policy for this purpose. See below under “Permissible Activities” for more information about the content of that policy.

Iowa Code Sections 261F.3(7)(a)(1) and (2); 34 CFR 601.21(c)(3)(i) and (ii)

Institutional Boards of Directors or Trustees
No officer, employee, or agent of a lender, lender servicer, or guarantor may serve on this institution’s board of directors or trustees, unless we have a written conflict of interest policy.

This institution has a written conflict of interest policy for this purpose. See below under “Permissible Activities” for more information about the content of that policy.

Iowa Code Sections 261F.3(7)(a)(3); 34 CFR 601.21(c)(3)(iii)

Permissible Activities

Lender, Lender Servicer, and Guarantor
An employee or agent of the institution who is not employed in the financial aid office and who has no responsibility with respect to education loans may serve unrestricted and be compensated for service on the board of directors of a lender, lender servicer, or guarantor.

An employee or agent of the institution who is not employed in the financial aid office but who has responsibility with respect to education loans may serve on the board of directors of a lender, lender servicer, or guarantor, and be compensated for that service, if the institution has a written conflict of interest policy. Our conflict of interest policy specifies that an officer or agent of the institution who is serving on such a board of directors must not participate in any decision of the board with respect to any transaction regarding education loans.

Iowa Code Section 261F.3(7)(a)(1) and (2); 34 CFR 601.21(c)(3)(i)

Institutional Board of Directors and Trustees
The institution may permit an officer, employee, or agent of a lender, lender servicer, or a guarantor to serve as a member of our board of directors or trustees if we have a written conflict of interest policy. The institution has a conflict of interest policy for this purpose. Our conflict of interest policy includes all of the following:

- A prohibition against the participation of such a member in any decision regarding education loans offered to our students or their families,
- Procedures to be followed when such a member's personal or business interests in education loans may be advanced by an action of the board of directors or trustees, and
- A prohibition against the participation of such a member in any decision to approve any transaction where such conflicting interests may be advanced.

Iowa Code Sections 261F.3(7)(a)(3) ; 34 CFR 601.21(c)(3)(iii)

Bundling of Private Loans

Impermissible Activities

The institution's financial aid staff will not bundle (i.e., package) a private education loan in a student's financial aid offer, except under certain conditions. See "Permissible Activities" below for more information about acceptable conditions for private loan bundling.

Iowa Code Section 261F.5(2)

Permissible Activities

The institution's financial aid staff may bundle (i.e., package) a private education loan in a student's financial aid offer under any one of the following conditions:

- The borrower is ineligible for additional funding
- The borrower has exhausted the limits of his or her eligibility for Title IV loans (Federal Direct Student Loans, and, as applicable, parent or Grad PLUS)

- The borrower has not filled out a Free Application for Federal Student Aid (FAFSA)

- The borrower does not desire, or refuses to apply for, a Title IV loan (including a parent PLUS loan)

The bundling of a private education loan will be clearly and conspicuously disclosed to the borrower, in a manner that distinguishes them from loans made under Title IV of the HEA, prior to the borrower's acceptance of the financial aid package.

Iowa Code Section 261F.5(2); 34 CFR 601.11(c)

Choice of Lender

Impermissible Activities

Regardless of whether this institution maintains a preferred lender arrangement for education loans, our financial aid office will not:

- Refuse to certify or delay certification of an education loan based on a borrower's selection of a lender or guarantor
- Assign a first-time borrower's education loan to a particular lender through packaging or other methods

34 CFR 601.21(c)(4)

Consulting and Contractual Arrangements

Impermissible Activities

An officer, employee, or agent of the institution who is employed in the financial aid office or who otherwise has responsibilities with respect to education loans will not accept from any lender or its affiliate any fee, payment, or other financial benefit as compensation for any type of consulting arrangement or other contract to provide services to or on behalf of the lender. A prohibited financial benefit includes the opportunity to purchase stock.

Iowa Code Section 261F.3(3); 34 CFR 601.21(c)(3)

Permissible Activities

An officer, employee, or agent of the institution who is not employed in the financial aid office and who has no responsibilities with respect to education loans may accept compensation from a lender for a consulting arrangement or other contract to provide services to or on behalf of a lender.

Iowa Code Section 261F.3(3); 34 CFR 601.21(c)(3)

Loan Counseling

Permissible Activities

The institution may request and accept services from a lender or guarantor in conducting initial (i.e., entrance) and exit loan counseling for our students (including in-person counseling or on-line counseling resources), provided:

- Institutional staff is in control of the counseling. To be considered "in control of the counseling," staff must review and approve the content of the counseling and provide oversight over how the counseling is conducted.
- The lender or guarantor does not promote a specific lender's products or services.

Counseling materials that the institution accepts from a lender or guarantor must disclose the identity of the entity that assisted in preparing or providing the materials and must not be used to promote the lender's or guarantor's education loan or other products. A guarantor's materials may promote benefits provided under other federal and state programs that the guarantor administers.

Iowa Code Section 261F.4(5)(a); 34 CFR 601.21(c)(2)(iii)(D); 34 CFR 601.21(c)(6)(ii); 34 CFR 682.200(b) Definition of "Lender" (5)(i)(10) and (5)(ii)(B); 34 CFR 682.401(e)(2)(i); Federal Register dated October 28, 2009, p. 55631

Loan Terms and Conditions

Impermissible Activities

The institution will not request or accept from any lender an offer of funds to be used for private education loans, including funds for an opportunity pool loans (see the separate definition of opportunity pool loans below), in exchange for the institution's promise to provide the lender with any of the following:

- A specified number of education loans
- A specified education loan volume
- A preferred lender arrangement

34 CFR 601.21(c)(5)

The institution will not place a lender on a preferred lender list (PLL), or provide that lender with preferred placement on the PLL, in exchange for benefits the lender provides to the institution or to our students in connection with a different type of loan.

Iowa Code Section 261F.6(4)

Opportunity Pool Loans
An opportunity pool means a private education loan made by a lender to a student attending this institution or a student's family member that this institution guarantees in any manner or that involves the institution directly or indirectly paying points, premiums, payments, additional interest, or other financial support to the lender for the purpose of that lender extending credit to the borrower.

Iowa Code Section 261F.3(5); 34 CFR 601.21(c)(5)(ii)

Permissible Activities

The institution may solicit or accept from any lender an offer of funds to be used for private education loans (including opportunity pool loans), if it is **not** provided in exchange for a promise that the institution will deliver to the lender a specified number of loans or loan volume, or place that lender on the institution's preferred lender list.

Iowa Code Section 261F.3(5); HEA Section 487(e)(5); 34 CFR 601.21(c)(5)(ii)

The institution may solicit and accept the following favorable education loan terms and conditions on behalf of our student and parent borrowers:

- A reduced origination fee
- A reduced interest rate
- Benefits offered to a borrower under a repayment incentive program that requires, at minimum, one or more scheduled payments to receive or retain the benefit
- Benefits under a loan forgiveness program for public service or other targeted purposes approved by:
  - The Iowa Attorney General for a private loan forgiveness program
  - The U.S. Department of Education for a federal loan forgiveness program

An *employee* of the institution may accept favorable terms, conditions, and borrower benefits on an education loan if the terms, conditions, and benefits on the employee's loan are comparable to those provided to all of our students.

Iowa Code Section 261F.1(5); 34 CFR 601.21(c)(2)(iii)(C); 34 CFR 682.200(b) definition of lender (5)(ii)(I);

Meals, Refreshments, and Receptions

Impermissible Activities

See the definition of "Gift" for information about cases when meals, refreshments, or other hospitality is considered a prohibited gift.

Permissible Activities

The institution's employees and agents may accept from any lender or guarantor food and refreshments that are reasonable in cost and are offered as an integral part of a training session or conference that is designed to contribute to the professional development of our employees or agents. The food and refreshment sponsored by the lender or guarantor must be offered to all who attend the training session or conference.

Our employees and agents may attend a lender- or guarantor-sponsored reception for which food and refreshments are provided, so long as the reception is a general gathering that is held in conjunction with a training session or conference and is open to all attendees.

In addition, the institution's employees and agents may accept from a guarantor food and refreshments that are reasonable in cost and provided in connection with other workshops and forums the agency uses to fulfill its guaranty agency responsibilities.

Iowa Code Section 261F.1(5)(b); HEA Section 487(e)(2)(B)(ii)(II); 34 CFR 601.21(c)(2)(iii)(B); Federal Register, Vol. 72, No. 211, November 1, 2007, p. 61981

Prudent Person Test
Employees of the institution who participate in the planning of a student-aid related training session or conference will ensure that food and refreshments sponsored by a lender or guarantor is reasonable in cost by applying the "prudent person test." In other words, the cost per person for the sponsored event must not exceed the cost that would be incurred by the prudent person under the circumstances at the

time the decision was made to incur the cost. The burden of proof will be, in part, on event managers to show that costs are consistent with the normal per-person cost of the event.

November 1, 2007, Federal Register, Vol. 72, No. 211, p. 61981

Misleading Identification of Institutional Employees

Impermissible Activities

The institution will not permit a lender's or guarantor's employee or agent to be identified as an institutional employee, representative, or agent.

Iowa Code Section 261F.4(2)

Payment of Education Loan Costs

Permissible Activities

The institution may make principal or interest payments on an education loan to lower costs for our borrowers.

Impact on Our Cohort Default Rate
If an owner, agent, contractor, employee, or other entity or individual affiliated with the institution makes a payment to prevent default on a Federal loan, or a Consolidation loan that repaid a Federal loan, during the period for which our cohort default rate is calculated, that loan is considered to be in default and counts against our cohort default rate notwithstanding the payment.

Iowa Code Section 261F.3(7)(b); 34 CFR 668.183(c)(1)(iii); USDE Cohort Default Rate Guide, Chapter 2, p. 2-1.9

Preferred Lender Arrangements

Definition
A preferred lender arrangement is an arrangement or agreement between the institution or an institution-affiliated organization* and a lender that provides education loans to our students and their families in which we or our affiliated organization recommends, promotes, or endorses the lender's education loan product.

There are two conditions that must be met in order for a preferred lender arrangement to exist between a lender and this institution or an institution-affiliated organization*:

- A lender provides or issues education loans to our students or their families, and
- We, or an institution-affiliated organization*, recommends, promotes, or endorses the lender's education loan products.

A preferred lender arrangement does not require a written or verbal agreement, nor is a preferred lender arrangement confined to only cases in which the lender is included on a preferred lender list.

Iowa Code Section 261F.1(8); 34 CFR 601.2; Federal Register dated July 28, 2009, p. 37436; Federal Register dated October 28, 2009, p. 55630

A preferred lender arrangement does **not** include any of the following loans:

- Federal Direct
- Federal Perkins

Iowa Code Section 261F.1(8)

The identity of any private lender with whom the institution or an institution-affiliated organization* have a preferred lender arrangement will be displayed on all information and documentation related to the lender's loans.

34 CFR 601.12(b)

For any year in which the institution has a preferred lender arrangement, we will annually compile and make available for students attending the institution and their families a list of the specific education loan lenders that the institution recommends, promotes, or endorses.

34 CFR 668.14(b)(28)

See "Introduction" for more information about an "institution-affiliated organization."

Preferred Lender Lists

(Applicable to the institution, and any institution-affiliated organization*, that has a preferred lender arrangement for education loans.)

A preferred lender list (PLL) is a list of education loan lenders which the institution recommends, promotes, or endorses, and with which we have a preferred lending arrangement.

Impermissible Activities

The institution's PLL will not include less than three unaffiliated lenders (see the paragraph immediately below for an exception). For this purpose, a lender is affiliated with another lender if any of the following applies:

- The lenders are under the ownership or control of the same entity or individuals
- The lenders are wholly or partly owned subsidiaries of the same parent company
- The directors, trustees, or general partners, or individuals exercising similar functions, of one of the lenders constitute a majority of the persons holding similar positions with the other lender

Iowa Code Sections 261F.1(9) and 261F.6(1)(b)

If we initially meet the preferred lender list requirement of including a minimum of three unaffiliated lenders, we may be later notified that one or more of those lenders has decided to discontinue making loans to our students and parents. The USDE and the Iowa Attorney General will take such circumstances, over which we have no control, into consideration in determining our compliance with the requirement that we maintain at least three unaffiliated lenders on our preferred lender list.

U.S. Department of Education Dear Colleague Letter GEN-08-06

A PLL will not include lenders that have offered, or have offered in response to our solicitation, financial or other benefits to the institution in exchange for inclusion on the PLL, or a promise that the institution

or its students will send a certain number of loan applications to the lender.

Iowa Code Sections 261F.6(1)(c)

Our financial aid office will not use a PLL to do any of the following:

- Require a prospective borrower to use a lender on our PLL
- Deny or otherwise impede a borrower's choice of lender
- Assign a first-time borrower's loan to a particular lender through packaging or other methods
- Refuse to certify a loan or cause unnecessary certification delays for a borrower who selects a lender that does not appear on our PLL

Iowa Code Sections 261F.6(1)(a) and 261F.6(2)(c), (d), and (e); 34 CFR 601.10(d)(1)(iii); 34 CFR 601.10(d)(5); 34 CFR 601.21(c)(4)

Preferred Lender List Alternatives

Permissible Activities

The institution's financial aid office is not required to maintain a preferred lender list for education loans, and is permitted to provide no information to education loan borrowers about lenders.

Other acceptable alternatives to a preferred lender list appear below. These alternatives are not considered a preferred lender list or preferred lending arrangement:

- If the institution desires to compile a preferred lender list but is unable to identify at least three unaffiliated lenders that will make loans to its students or parents sufficient to meet the requirements of a preferred lender list, we may provide the names of all of the lenders that have indicated that they would provide loans to our students and their parents. In providing this information, we will make it clear that we do not endorse the lenders, and provide a clear statement that the borrower may choose to use any lender that will make loans to the borrower for attendance at this institution.

- We may provide a neutral, comprehensive list of lenders that have made loans to our students or parents in the past three to five years (or some other period) and that have indicated that they would continue to make loans to our students. We may provide contact information for the lender, and comparative information about the terms and conditions of loans offered by the lender. We will not provide any additional information about the lender, including, for example, the percentage of loans made to our students by a particular lender. We will make it clear that we do not endorse the lenders, and that the borrower can choose to use any lender that will make loans to the borrower for attendance at this institution.

- We may refer a prospective private education loan borrower to a Web site developed by a third party that contains a neutral, comprehensive list of private education lenders and the loan products each lender offers. We will ensure that the list provided on such a Web site is broad in scope, does not endorse or recommend any of the lenders on the list and the lenders on the list do not either pay the third party who maintains the Web site for placement on the list or pay the third party a fee based on any loan volume generated.

U.S. Department of Education Dear Colleague Letter GEN-08-06; Federal Register, Vol. 74, No. 207, October 28, 2009, p. 55630.

Publications

Impermissible Activities

The institution will not permit a lender with which it has a preferred lender arrangement* to prepare any of our materials related to education loans, with exceptions permitted by law and noted below under "Permissible Activities."

*See "Preferred Lender Arrangements" for more information.

Iowa Code Section 261F.4(3) and (5)(a)

The institution will not permit a lender or guarantor to print and distribute our catalogue and other non-counseling or non-student financial aid-related materials at reduced or no cost.

34 CFR 682.200(b) definition of lender (5)(iii)(C); 34 CFR 682.401(e)(3)(iii)

We will not permit a lender to use our name, emblem, mascot, logo, other words, pictures or symbols readily identified with the institution in the marketing of private education loans to our students or parents in a way that implies that the institution endorsesthe lender's private education loans or that the loan is offered or made by this institution. We may allow the use of our name if it is part of the lending institution's name.

Iowa Code Section 261F.4(4); 34 CFR 601.12(a)

Permissible Activities

The institution may request and accept, free of charge, student aid, financial literacy, debt management, default prevention, or default aversion materials and publications from a lender or a guarantor. We may also request and accept initial (i.e., entrance) and exit loan counseling materials and services from any lender or guarantor (see "Loan Counseling" for additional information).

Iowa Code Sections 261F.1(5)(a) and 261F.4(5)(a); 34 CFR 601.21(c)(2)(iii)(A) and (D); 34 CFR 601.21(c)(6)(ii)

Revenue-Sharing Arrangements

Impermissible Activities

The institution or an agent of the institution will not solicit or accept a fee, revenue- or profit-sharing, or other material benefit provided by a lender that issues education loans to our students or their families in exchange for the institution recommending the lender or the lender's education loan products.

Iowa Code Sections 261F.1(11) and 261F.3(4); 34 CFR 601.21(c)(1)

Staffing Assistance

Impermissible Activities

The institution will not permit any lender to staff our financial aid offices or call center, except on a short-term, non-recurring, emergency basis.

Iowa Code Section 261F.4(5)(b); 34 CFR 601.21(c)(6)

The institution will not permit a guarantor to staff our financial aid offices or call center under any circumstances.

HEA Section 428(b)(3)(C)

Permissible Activities

The institution may permit a lender to staff our financial aid offices or call center on a short-term, non-recurring, emergency basis.

For this purpose, "emergency" is defined as:

- A State-designated natural disaster
- A Federally-declared natural disaster (identified by the Federal Emergency Management
- Agency on its website at www.fema.gov)
- A Federally-declared national disaster
- Another localized disaster or emergency approved by the Iowa Attorney General and the USDE

Iowa Code Sections 261F.4(3) and 261F.4(5)(b); 34 CFR 601.21(c)(6)(iii)

State Education Grants, Scholarships, & Financial Aid Funds

Permissible Activities

The institution may accept Iowa grants, scholarships, and other state-based financial aid funds administered by the Iowa College Student Aid Commission under Iowa Code Chapter 261.

Iowa Code Section 261F.1(5)(e); 34 CFR 601.21(c)(2)(iii)(F)

Student Aid Related Programs

Permissible Activities

The institution may request and accept from any lender or guarantor standard materials, activities, and programs, including workshops and training, related to student aid outreach, financial literacy, debt management, default prevention and aversion, or educational counseling that are designed to improve the lender or guarantor's services.

The lender or guarantor that provides any materials to us must disclose its identity in the materials that it assists in preparing or providing, and the lender's or guarantor's materials must not promote its student loan or other products. A guarantor may promote benefits provided under other Federal or State programs the guarantor administers.

The institution may also accept services that a guarantor must perform to meet its obligations to administer other Federal and State education programs.

Iowa Code Section 261F.1(5)(a) and 261F.4(5)(a); 34 CFR 601.21(c)(2)(iii)(A); November 1, 2007, Federal Register, Vol. 72, No. 211, pp. 61982

Technology

Impermissible Activities

The institution and its affiliated organization(s) will not accept from a lender or a guarantor either of the following at below market rental or purchase cost:

- Computer hardware
- Computer software that is unrelated to education loan processing or financial aid

Iowa Code Section 261F.1(5)(f); HEA Section 435(d)(5); 34 CFR 682.200(b) Definition of "Lender" (5)(iii); 34 CFR 682.401(e)(3)(iii)

The institution will not accept free data transmission services from any lender or guarantor that is unrelated to electronic loan processing or, for federal student loans, student status confirmation data.

Iowa Code Section 261F.1(5)(f); 34 CFR 682.200 Definition of "Lender" (b)(5)(ii)(D); 34 CFR 682.401(e)(2)(vii)

Permissible Activities

The institution may accept, free of charge, any of the following from a lender or a guarantor:

- Financial aid related software
- Loan processing data transmission services
- A toll-free telephone number to obtain information about education loans

The institution may also accept free student status confirmation data processing services for federal student loans from a lender or guarantor.

Iowa Code Section 261F.1(5)(f); 34 CFR 682.200(b) Definition of "Lender" (5)(iii)(C); 34 CFR 682.401(e)(3)(iii)

Training

Impermissible Activities

The institution and an institution-affiliated organization will not accept payment of training or conference registration, travel or lodging costs from any lender or guarantor.

Iowa Code Section 261F.1(5); 34 CFR 601.21(c)(2)(ii)

Permissible Activities

The institution may request and accept, free of charge, from any lender or guarantor standard materials, activities, and programs, including workshops and training, that are designed to improve the lender or

guarantor's services or contribute to the professional development of our financial aid office staff relative to financial aid administration, student aid outreach, financial literacy, debt management, default prevention and aversion, and educational counseling.

Iowa Code Section 261F.1(5)(a); HEA Section 487(e)(2)(B)(ii); HEA Section 487(e)(6)(B)(i); 34 CFR 682.401(e)(2)(ii), (iii) and (iv); 34 CFR 601.21(c)(2)(iii)(A); 34 CFR 601.21(c)(6)(i)

Travel and Lodging

Impermissible Activities

An officer, employee, or agent of the institution who is employed in the financial aid office or who otherwise has education loan responsibilities will not request or accept lodging or travel costs from a lender or lender servicer, or a guarantor, except as provided below.

Permissible Activities
See "Advisory Councils" and "Boards of Directors" for information about conditions under which an institutional employee or agent may receive reimbursement for reasonable expenses incurred in service on an advisory council or board of directors.

Other Permissible Benefits and Services

The institution and our affiliated organizations may accept other benefits or services that are specifically identified in a separate, public notice issued by the Iowa Attorney General or the USDE.

Iowa Code Section 261F.1(5)(n); 34 CFR 682.200(b) Definition of "Lender" (5)(ii)(A); 34 CFR 682.401(e)(2)(i)