

**JUNIATA COLLEGE
STUDENT LENDING
CODE OF CONDUCT**

The Higher Education Opportunity Act conditions the eligibility of educational institutions to participate in Title IV programs on the development of and compliance with a code of conduct prohibiting conflicts of interest for its financial aid personnel. Juniata College is committed to providing students and their families with the best information and processing alternatives available regarding student borrowing. In support of this and in an effort to rule out any perceived or actual conflict of interest between Juniata College officers, employees or agents and education loan lenders, Juniata College has adopted the following code of conduct:

- Juniata College bases its selection of preferred loan lenders solely on the best interests of its students and their parents. Students and parents have the right to select the lender of their choice, regardless of our preferred lender list. Students and parents also have the right to use any guarantor of their choice. Juniata College will not refuse to certify or otherwise deny or delay certification of a loan based on the borrower's selection of a lender and/or guarantor.
- Juniata College does not assign a lender to any first-time borrower through financial aid packaging or any other means.
- Juniata College does not participate in any revenue-sharing arrangements with any lender.
- Juniata College does not permit any officer, employee or agent of the school who is employed in the financial aid office or is otherwise involved in the administration of education loans to accept any gifts of greater than a nominal value from any lender, guarantor or servicer. In addition, no lender may bargain to become a preferred lender with respect to a certain type of loan by providing benefits to the College.
- Juniata College does not permit any officer, employee or agent of the school who is employed in the financial aid office or is otherwise involved in the administration of education loans to accept any fee, payment or other financial benefit (including a stock purchase option) from a lender or affiliate of a lender as compensation for any type of consulting arrangement or contract to provide services to a lender or on behalf of a lender relating to education loans.
- Juniata College will not request or accept any offer of funds to be used for private education loans to students from any lender in exchange for providing the lender with a specified number or volume of Title IV loans, or a preferred lender arrangement for Title IV loans.
- Any college employee, in the financial aid office or with responsibilities regarding educational loans or financial aid, who serves on an advisory board, commission, or group established by a lender, guarantor, or group of lenders or guarantors, shall be prohibited from receiving anything of value from the lender, guarantor, or group of lenders or guarantors. However, the employee may be reimbursed for reasonable expenses incurred in serving on the advisory board, commission, or group.
- Juniata College requires lenders to identify themselves to students and parents as representatives of their companies. No employee of a lender may ever work in or provide staffing assistance to Juniata's financial aid office.
- Juniata College will not request or accept any assistance with call center or financial aid office staffing.