## MBTS FINANCIAL AID CODE OF CONDUCT

The Midwestern Baptist Theological Seminary & College, SBC (MBTS) Financial Aid Office endeavors to provide excellent service to the student body to ensure they will receive the maximum allowable amount of federal and institutional, as well as other organizational aid allowed by law. In compliance with the Secretary of Education's request, and to be in compliance with recent regulatory changes, the MBTS Financial Aid Code of Conduct follows:

- 1. MBTS shall not enter into a revenue-sharing arrangement with any lender. This is defined as any arrangement between a school and a lender that results in the lender paying a fee or other benefits, including a share of the profits, to the school, its officers, employees or agents, as a result of the school recommending the lender to its students or families of those students.
- 2. 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 any gift from a lender, guarantor, or servicer of education loans. However, the law does provide for some exceptions related to specific types of activities or literature. This includes: brochures or training material related to default aversion or financial literacy, and/or food, training or informational materials as part of training as long as that training contributes to the professional development of those individuals attending the training.
- 3. 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.
- 4. MBTS shall not request or accept funds from any lender for private education loans including funds for an *opportunity pool loan*<sup>1</sup> to its students in exchange for the school providing concessions or promises to the lender regarding the number or volume of Title IV loans or a preferred lender arrangement.
- 5. MBTS Financial Aid Office personnel will not assign, deny or otherwise impede a borrower's right to choose a particular lender or guarantor.
- 6. MBTS must not accept or request any assistance from any lender with call center or financial aid office staffing. However, professional development training for financial aid administrators, educational counseling/financial literacy/debt management materials for borrowers that disclose the identification of the lender that assisted in preparing and providing the materials, or staffing services on a short term, non recurring basis during State or Federally declared natural disasters, or other localized disasters and emergencies identified by Department of Education are not prohibited.
- 7. Any MBTS employee in the financial aid office or with responsibilities regarding the education 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.

<sup>&</sup>lt;sup>1</sup> A private education loan made by a lender to a student or his family attending MBTS that involves a payment, directly or indirectly, by the school of points, premiums, additional interest, or financial support to the lender for the lender's extension of credit to the student or family.