



MARINE TRADES INSTITUTE FACULTY & STAFF FINANCIAL AID & OPERATIONS CODE OF CONDUCT

Marine Trades Institute, as a participant in the federal student loan programs, is required to have a code of conduct relating to student financial aid issues that is applicable to the College's agents and employees. The code of conduct requirements are set forth in the Higher Education Opportunity Act (HEOA) signed into law on August 14, 2008. In addition, the law includes requirements related to the publication of the code and annual disclosures.

The code of conduct must prohibit a conflict of interest with the responsibilities of an agent or employee of an institution, with respect to such loans, and include the provisions set forth in the HEOA related to conflicts. The law further specifies that the code shall be displayed prominently on the institution's website and that all institutional agents or employees with responsibilities related to such loans be annually informed of the provisions of the code of conduct.

Marine Trades Institute hereby adopts the following as the code of conduct related to student loan activities and will annually inform all Marine Trades Institute agents or employees with responsibilities for student loan activities and decisions of the provisions of this code.

Gifts

No employee of the College who works in the financial aid office of the College or who otherwise has responsibilities with respect to education loans, or an agent who has responsibilities with respect to education loans, shall solicit or accept any gift from a lender, guarantor, or servicer of education loans. A gift to a family member or an employee or to any other individual based on that individual's relationship with the employee shall be considered a gift to the employee if the gift is given with the knowledge and acquiescence of the employee and the employee has reason to believe the gift was given because of the employee's position at the College. (For the purpose of this policy, a "relative" is defined as an individual with whom an employee has a relationship by blood, marriage, adoption, domestic partnership, or other personal relationship in which objectivity might be impaired.)

The term "gift" means any gratuity, favor, discount, entertainment, hospitality, loan or other item having a monetary value of more than a de minimums amount. The term includes a gift of 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. The term "gift" does not include the following:

1. Standard materials, activities, or programs on issues related to a loan, default, aversion, default prevention, or financial literacy, such as a brochure, a workshop, or training.
2. Food, refreshments, training or informational material furnished to the College as an integral part of a training session that is designed to improve the service of a lender, guarantor, or servicer of education loans to the College, if such training contributes to the professional development of the College's employees.
3. Favorable terms, conditions, and borrower benefits on an education loan provided to a student employed by the College or an employee who is the parent of a student if such terms, conditions, or benefits are comparable to those provided to all students of the College and are not provided because of the student's or parent's employment with the College.

for entrance and exit counseling as required by law, as long as the College's staff are in control of the counseling, and such counseling does not promote the products or services of any specific lender.

5. Philanthropic contributions to an institution from a lender, servicer, or guarantor of education loans that are unrelated to education loans or any contribution from any lender, guarantor, or servicer that is not made in exchange for any advantage related to education loans.

6. State education grants, scholarships or financial aid funds administered by or on behalf of a State.

7. Token awards from professional associations (state, regional, or national) that recognize professional milestones or extraordinary service to parents and students, or scholarships for conference attendance or other professional development opportunities.

Contracting Arrangements

No employee 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 type of consulting arrangement or other contract to provide services to a lender or on behalf of a lender relating to education loans.

Marine Trades Institute is not affiliated with any lenders and does not participate in any revenue sharing arrangements.

Interaction with Borrowers

The College will not assign a borrower's FFELP loan, through award packaging or other methods, to a particular lender. The College will not refuse to certify or delay certification of any federal loan based on the borrower's selection or a particular lender or guaranty agency. The College will not assign a student's private student loan to a particular lender, or refuse to certify or delay certification of any private loan, based upon the borrower's selection of a lender or guaranty agency. The College does not utilize a preferred lender list.

Private Loans

The College will not request or accept from any lender any offer of funds to be used for private education loans, including funds for an opportunity pool loan, to students in exchange for the College providing concessions or promises regarding providing the lender with a specified number of federal loans, a specified federal loan volume or a preferred lender arrangement for federal loans.

Staffing Assistance

The college will not request or accept from any lender any assistance with call center staffing or financial aid office staffing. Nothing in this section, however, prevents the College from accepting assistance from a lender related to professional development training for its staff; providing educational counseling materials, financial literacy materials, or debt management materials to borrowers, provided that such materials disclose to borrowers the identification of any lender that assisted in preparing or providing such materials; or staffing services on a short-term, nonrecurring basis to assist the College with financial aid-related functions during emergencies including state declared or federally declared natural disasters, federally declared national disasters, and other localized disasters and emergencies identified by the Secretary of Education.

Advisory Board Compensation

No employee who serves on an advisory board, commission, or group established by a lender, guarantor, or group of lenders or guarantors may receive anything of value from the lender, guarantor, or group of lenders or guarantors in return for that service.

Conflict of Interest

No employee shall have a conflict of interest with respect to any education loan or other student financial aid for which the employee has responsibility. Employees within the Marine Trades Institute Operations Office will not award aid to themselves or their immediate family members. Staff will reserve this task to an institutionally designated person, to avoid the appearance of a conflict of interest.

No employee may process any transaction related to his/her own personal financial aid eligibility or that of a relative.

Information Provided by the Financial Aid Office

Marine Trades Institute ensures:

1. Information provided by the Financial Aid Office is accurate, unbiased and does not reflect preference arising from actual or potential personal gain.
2. Institutional award notifications and/or other institutionally provided materials shall include a breakdown of individual components of Marine Trades Institute's cost of attendance, designating all potential billable charges, a clear identification of each award indicating type of gift aid, work or loan and standard terminology and definitions.
3. All required consumer information is displayed in a prominent location on the institutional web site and in any printed materials, easily identified and found and labeled as "Consumer Information."
4. Financial Aid and Operations Office employees will disclose to Marine Trades Institute any involvement, interest in, or potential conflict of interest with any entity with which the institutional has a business relationship.

Staff member signature

Supervisor signature

Date

Date