

The Higher Education Opportunity Act sets conditions for educational institutions to participate in Title IV programs and requires the development of and compliance with a code of conduct prohibiting conflicts of interest for its financial aid personnel. St. John Fisher University's officers, agents, and employees are also required to comply with this code of conduct.

St. John Fisher University as an institution, an individual officer, agent or employee shall not enter into any revenue-sharing arrangements with any lender.

A St. John Fisher University officer or employee who is employed in the Office of Student Financial Services or who otherwise has responsibilities with respect to education loans, or agent, who has responsibilities with respect to education loans, or any of their family members, shall not solicit or accept any gift from a lender, guarantor, or servicer of education loans. The term "gift" means any, favor, discount, entertainment, hospitality, printing services, money, equipment, loan, or other item having a monetary value of more than a de minimus amount.

An officer or employee of St. John Fisher University, who is employed in the Office of Student Financial Services or who otherwise has responsibilities with respect to education loans, or an agent, who has responsibilities with respect to education loans, shall not accept from any lender or affiliate of any lender any fee, payment or other financial benefit (including 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.

St. John Fisher University may assign a borrower's federal loan to the federal government as the lender. Under no circumstances will the University 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 lender or guaranty agency.

St. John Fisher University shall 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 institution providing concessions or promises regarding providing the lender with:

- a) a specified number of loans made, insured, or guaranteed under this title;
- b) a specified loan volume of such loans; or