

## GNOMON TITLE IV CODE OF CONDUCT

As required by the Higher Education Opportunity Act (HEOA) of 2008 (amending the Higher Education Act of 1965, Pub. L. # 110-315), Gnomon has established the following Code of Conduct. Gnomon and its employees certify the following:

- 1) We will not enter into any revenue-sharing arrangements with any lender, which is defined as any arrangement between a college and a lender that results in the lender paying a fee or other benefits, including a share of its profits, to the college, or its officers, employees or agents, as a result of the college recommending the lender to its students or families of those students.
- 2) Financial Aid Office employees (or employees who otherwise have responsibilities with respect to education loans or financial aid) will not accept gifts from any lender, guaranty agency or loan servicer. A gift is defined as any gratuity, favor, discount, entertainment, hospitality, loan, or other item having monetary value of a significant amount. This prohibition is not limited just to those servicers of Title IV loans but includes lenders of private educational loans as well. The HEOA provides for some exceptions related to specific types of activities or literature, including:
  - a. Brochures or training material related to default aversion or financial literacy
  - b. Food, training or informational materials included as part of training as long as that training contributes to the professional development of those individuals attending the training
  - c. Favorable terms and benefits to the student employed by the institution as long as those same terms are provided to all students at the institution
  - d. Entrance and exit counseling as long as the college's staff are in control and they do not promote the services of a specific lender
  - e. Philanthropic contributions from a lender, guarantee agency or loan servicer unrelated to education loans
  - f. State education, grants, scholarships or financial aid funds administered by or on behalf of the State
- 3) Financial Aid Office employees (or employees who otherwise have responsibilities with respect to education loans) will not accept any fee, payment or financial benefit as compensation for any type of consulting arrangement or contract to provide services to or on behalf of a lender relating to education loans.
- 4) The college's officers, employees and/or agents will not steer any borrowers, including first-time borrowers, to particular lenders nor assign any borrower a lender through award packaging or other methods. The college will not refuse to certify, or delay certification based on the borrower's selection of a particular lender or guaranty agency.
- 5) The college's officers, employees and/or agents will not request or accept any offer of funds for a private loan, including funds for an opportunity pool loan, to students in exchange for providing concessions or promises to the lender for a specified number of loans made, insured or guaranteed, a specified loan volume, or a preferred lender arrangement.
- 6) The college's officers, employees and/or agents will not request or accept any assistance with call center staffing or financial aid office staffing. The HEOA does not prohibit schools from requesting or accepting assistance from a lender related to:
  - g. Professional development training for financial aid administrators
  - h. 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
  - i. Staffing services on a short-term, nonrecurring basis to assist the school with financial aid-related functions during emergencies, including State-declared or federally declared natural disasters, and other localized disasters and emergencies identified by the Secretary

- 7) No officer or employee of the college, or any employee or agent who otherwise has responsibilities with respect to educational loans, and who serves on an advisory board, commission, or group established by a lender, guarantor, or group of lenders or guarantors will receive anything of value from the lender, guarantor or group except for reimbursement of reasonable expenses incurred by serving on the board, commission, or group.