

Code of Conduct on Student Financial Assistance

Georgetown University takes seriously its responsibilities in administering student financial assistance. Georgetown strives to make the financial aid process transparent and fair to students and is committed to avoiding potential conflicts of interest with lenders. Georgetown complies with the requirements of Title IV of the federal Higher Education Act governing student financial assistance and the [“Code of Conduct for Relationships between Universities in the District of Columbia and Educational Loan Providers”](#).

This Code of Conduct summarizes and describes the standards that Georgetown and its officers, agents, and employees must follow in their relationships with entities that make or guarantee loans to students, parents or others for the purposes of financing students’ higher education expenses (“lenders”).

- Georgetown does not receive anything of value from a lender in exchange for providing the lender with advantages in marketing, offering, or making loans to Georgetown students or prospective students. Among the practices in which Georgetown does not engage are the following:
 - Engaging in revenue sharing, meaning any arrangement under which a lender pays a fee or provides other material benefits to the institution in exchange for the institution recommending the lender’s loan products.
 - Receiving computer hardware at below-market prices from a lender.
 - Receiving printing costs and services from a lender.
- At Georgetown, borrowers alone have the power to choose lenders and will receive timely loan certification regardless of the lender selected. Georgetown does not steer borrowers to particular lenders or delay loan certifications. Specifically, Georgetown does not:
 - Assign any first-time borrower’s loan to a particular lender.
 - Refuse to certify or delay the certification of any loan based on the borrower’s selection of a particular lender or guaranty agency.
 - Direct potential borrowers to any electronic Master Promissory Notes or other loan agreements that do not allow students to enter or select the lender code name for any lender offering the relevant loan through the relevant guaranty agency or electronic application service.
- Georgetown does not request or accept from lenders any offer of funds for private loans in exchange for providing concessions or promises to the lender for a specific number of Title IV loans made, insured, or guaranteed, or a specified loan volume, or a preferred lender arrangement. This prohibition covers “opportunity loans” and “opportunity pool loans.”
- Georgetown does not request or accept call center staffing or financial aid office staffing from lenders.
- In maintaining any list of preferred or recommended lenders, Georgetown:
 - Selects lenders for the list with care, based on the best interests of students and their families, without regard to the pecuniary interests of Georgetown, and based on the merits of the lender’s loan product(s) to

- which the list relates, without regard to other loan products offered by the lender or other benefits or incentives offered to Georgetown.
- Prominently discloses the methods and criteria used in selecting lenders for the list.
 - Discloses why Georgetown entered into an arrangement with each lender on the list.
 - Discloses detailed information about the terms and conditions of the loans offered by the lenders on the list.
 - Informs students and parents that they are not required to use any of the lenders on the list and will not be penalized by choosing a lender not on the list.
 - Ensures that the list contains at least three lenders unaffiliated with each other for Title IV loans and at least two lenders unaffiliated with each other for private educational loans.
 - Reviews the list annually.
 - Ensures that any lender appearing on a list has provided written assurance that it will clearly and conspicuously disclose to students, at the time of the loan, any pre-existing arrangements to sell the loan to another institution.
 - Does not deny or impede a student's choice of a lender or delay certifying a Title IV loan for a borrower who chooses a lender not on the list.
 - Officers and employees who work in Georgetown financial aid offices or who otherwise have responsibilities related to educational loans may not:
 - Solicit or accept gifts, trips or lodging of more than nominal value from lenders, guaranty agencies, or loan servicers.
 - Enter into a contract or employment arrangement or otherwise accept compensation or financial benefits for consulting or other services relating to educational loans provided to or on behalf of a lender.
 - Receive anything of value for service on the advisory board, commission, or other group established by a lender.
 - Georgetown will not treat any loans made under the "School as Lender" program any differently from loans that originated from another lender.

Georgetown will publish this Code of Conduct on its website and inform all officers, employees, and agents with responsibility for such loans of the Code provisions on an annual basis. Violations of the Code of Conduct may result in discipline under applicable University policies and procedures, up to and including termination.