



## Student Loan Professional Code of Conduct

**Douglas J Aveda Institute adheres to the highest level of professional conduct in its administration of its financial aid programs. The Institute does not have any preferred lender arrangements. It has adopted the following code of conduct related to its relationship with any student loan lender.**

The Code of Conduct applies to all officers, employees, Financial Aid Officers, and agents of the school, and prohibits these individuals from receiving gifts from a lender, guaranty agency or loan servicer. Financial Aid Officer may not accept any compensation for a consulting arrangement or services to or from a lender. The Financial Aid Officer is prohibited from accepting compensation or gifts for service on a lender, guaranty agency, or loan servicer advisory board, commission, or group.

DJAI distributes this policy annually to the employees identified above, informing them of the provisions of the Code of Conduct, and prohibitions against accepting gifts, compensation, or anything of monetary value in connection with securing loans, servicing loans, etc. with any lender, guaranty agency or servicer.

Not only has Douglas J Aveda Institute developed its own code of conduct policy as stated below, as a member of NASFAA, it also follows the code of conduct published by the association. A link to the NASFAA Code of Conduct is available at the bottom of this document.

### **1. PROHIBITION OF FINANCIAL ARRANGEMENTS**

Neither the school nor its employees will accept anything of more than nominal value from any lending institution, guaranty agency, or loan servicer. This specifically includes revenue sharing arrangements and payments or gifts for preferred lender/guarantor/servicer status, and the provision of printing and mailing at below-market prices. It also includes gifts or donations to students or the school and other grants, scholarships or prizes.

### **2. PROHIBITION OF GIFTS AND TRIPS**

School employees may not accept gifts of more than nominal value from any lending institution, guaranty agency, or loan servicer. This includes payments and reimbursement for lodging, meals and travel to conferences, meetings or training seminars.

### **3. ADVISORY BOARD RULES/COMPENSATION**

Note: Douglas J Aveda Institute (the Institute) as written in this document refers to the following locations, unless otherwise stated:  
Douglas J Aveda Institute Michigan Locations – Ann Arbor, East Lansing, Grand Rapids, Royal Oak  
Douglas J Aveda Institute Tennessee Location--Knoxville  
Douglas J Aveda Institute Chicago



School employees are prohibited from receiving anything of value for serving on an advisory board, commission or group of any lending institution, guaranty agency, or loan servicer. Employees are also prohibited from any type of consulting arrangement or contract to provide services to or on behalf of a lender, guaranty agency, or loan servicer relating to education loans (except for reimbursement for reasonable expenses).

#### **4. PREFERRED LENDER GUIDELINES**

The school's preferred lender list must be based solely on the best interests of the students or parents who may use the list without regard to financial interests of the institution. The school will not assign a lender, guaranty agency, or loan servicer to first-time borrowers. Currently the Institute does not have any preferred lender arrangements.

#### **5. PREFERRED LENDER DISCLOSURE**

On all preferred lender lists the school will clearly and fully disclose the criteria and process used to select preferred lenders, guaranty agencies, or loan servicers and inform students and parents that they have the right and ability to select the lender of their choice regardless of the preferred lender list. The school will not delay or deny a loan based on a student's choice of lender, guaranty agency, or loan servicer nor steer borrowers to particular lenders, guaranty agencies, or loan servicers.

#### **6. LOAN RESALE DISCLOSURE AND OPPORTUNITY LOAN PROHIBITION**

No lending institution, guaranty agency, or loan servicer may appear on a preferred lender list if the lender has an agreement to sell the loans to another lending institution, guaranty agency, or loan servicer without disclosing this fact. In addition, no lending institution may bargain to be a preferred lender, guaranty agency, or loan servicer with respect to a certain type of loan by providing benefits to the institution as to another type of loan (opportunity loans, except that the institution may offer loans to international students, at fair market rates, who would be otherwise unable to secure a domestic loan).

#### **7. CALL CENTER AND STAFFING PROHIBITION**

The school must ensure that employees of lending institutions, guaranty agencies, or loan servicers never identify themselves to students as employees of the institution. No employee of a lending institution, guaranty agency, or loan servicer may ever work in or provide staffing to the school's financial aid office.

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**As a member of the National Association of Student Financial Aid Administrators (NASFAA), Douglas J Aveda Institute financial aid and institute staff adhere to NASFAA Code of Conduct, available at**

[http://www.nasfaa.org/mkt/about/Code\\_of\\_Conduct.aspx](http://www.nasfaa.org/mkt/about/Code_of_Conduct.aspx)

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