



INSTITUTIONAL CODE OF CONDUCT STUDENT LOAN PROGRAM

According with the Higher Education Opportunity Act, HEOA, (PL 110-315) of August 14, 2008, which reauthorizes the Education Act of 1965, as amended, and its **Compliance Policy G-007-98R**, the Pontifical Catholic University of Puerto Rico establishes the following Code of Conduct related to the Student Loan Program. They are vital to the achievement of our students' academic goals. The process of these loans requires that the Financial Aid Officers and the entire university administration observe the integrity of the program. The purpose of this Code of Conduct is to avoid any conflict of interest between the institution, students and/or parents and student loan providers.

Financial aid professionals will ensure:

1. No action will be taken by financial aid staff that is for their personal benefit or could be perceived to be a conflict of interest.
 - a. Employees within the financial aid 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.
 - b. If a preferred lender list is provided, it will be compiled without prejudice and for the sole benefit of the students attending the institution. The information included about lenders and loan terms will be transparent, complete, and accurate. The complete process through which preferred lenders are selected will be fully and publicly disclosed. Borrowers will not be auto-assigned to any particular lender.
 - c. A borrower's choice of a lender will not be denied, impeded, or unnecessarily delayed by the institution, even if that lender is not included on the institution's preferred lender list.

- d. No amount of cash, gift, or benefit in excess of the minimum amount shall be accepted by a financial aid staff member from any financial aid applicant (or his/her family), or from any entity doing business with or seeking to do business with the institution (including service on advisory committees or boards beyond reimbursement for reasonable expenses directly associated with such service).
2. Information provided by the financial aid office is accurate, unbiased, and does not reflect preference arising from actual or potential personal gain.
3. Institutional award notifications and/or other institutionally provided materials shall include the following:
 - a. Breakdown of estimated individual Cost of Attendance components, including which are direct (billed by the institution) costs vs. indirect (not billed by the institution) costs.
 - b. Clear identification and proper grouping of each type of aid offered indicating whether the aid is a grant/scholarship, loan, or work program.
 - c. Estimated net price.
 - d. Standard terminology and definitions, using NASFAA's glossary of terms.
 - e. Renewal requirements for each award type being offered as well as next steps and financial aid office contact information.
4. All required consumer information is displayed in a prominent location on the institutional website(s) and in any printed materials, easily identified and found, and labeled as "Consumer Information".
5. Financial aid professionals will disclose to their institution any involvement, interest in, or potential conflict of interest with any entity with which the institution has a business relationship.



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Date