



CODE OF CONDUCT FOR EDUCATIONAL LOANS

In accordance with The Higher Education Opportunity Act of 2008, American College of Healthcare and Technology has adopted the following code of conduct with respect to lenders.

American College of Healthcare and Technology is committed to managing all student financial aid according to the highest ethical, moral and regulatory standards. All personnel assigned to American College of Healthcare and Technology Financial Aid offices shall conduct themselves in a professional and ethical manner at all times. Any American College of Health officer, employee, or agent who has responsibilities with respect to student educational loans is required to comply with this Code of Conduct.

- Be committed to removing financial barriers for those who wish to pursue postsecondary learning.
- Make every effort to assist students with financial need.
- Be aware of the issues affecting students and advocate their interests at the institutional, state, and federal levels.
- Educate students and families through quality consumer information.
- Respect the dignity and protect privacy of students, and ensure the confidentiality of student records and personal circumstances.
- Ensure equity by applying all need analysis formulas consistently across the institution's full population of student financial aid applicants.
- Provide services that do not discriminate on the basis of race, gender, ethnicity, sexual orientation, religion, disability, age, or economic status.
- Recognize the need for professional development and continuing education opportunities.
- Promote free expression of ideas and opinions, and foster respect for diverse viewpoints within the profession.
- Commit to the highest level of ethical behavior and refrain from conflict of interest or perception thereof.
- Maintain the highest level of professionalism, reflecting a commitment to the goals of Financial Aid Administrators.

Neither ACHT as an institution nor any individual officer, employee or agent shall enter into any revenue sharing arrangements with any lender.

No officer, employee, or agent or any family members, shall solicit or accept any gift from a lender, guarantor, or servicer of educational loans.

No officer, employee, or agent, shall accept from any lender or affiliate of any lender any fee, payment or financial benefit 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.

ACHT shall not request or accept from any lender an offer of funds for private loans, including funds for an opportunity pool loan, to students in exchange for providing concessions or promises to the lender for a specific number of Title IV loans made, insured, or guaranteed, a specific loan volume, or a preferred lender arrangement.

ACHT shall not request or accept from any lender any assistance with call center staffing or financial aid office staffing.

Any employee who is employed in the Financial Aid Office, or who otherwise has responsibilities with respect to education loans or other student financial aid of American College of Healthcare and Technology, and who serves on an advisory board, commission, or group established by a lender, guarantor, or group of lenders or guarantors, shall be prohibited from receiving anything of value from the lender, guarantor, or group of lenders or guarantors, except that the employee may be reimbursed for reasonable expenses incurred in serving on such advisory board, commission, or group.