

Code of Conduct Policy Pertaining to the Administration of Private Education Loans

As required by The Higher Education Opportunity Act (HEOA) of August 12, 2008, effective July 1, 2010, and in conjunction with the Federal Reserve Board regulations pertaining to the Truth in Lending Act, New York Methodist Hospital (the Institution), an institution participating in the Title IV Financial Aid Programs; publishes, administers, and enforces the following a code of conduct for its officers, employees, and agents.

- The Institution does not publish a “preferred lender list” of lenders with whom there is a business arrangement to process private student loans. As of the date of this policy, only one lender has indicated their willingness to make private loans to our students even though many other lenders have been approached. Therefore, only one lender can be recommended for students.
- The Institution will not enter into a revenue-sharing arrangement with any lender. The HEOA defines “revenue-sharing arrangement” as any arrangement between an institution and a lender under which the lender makes private education loans to students attending the institution (or to the families of those students), the institution recommends the lender or the loan products of the lender and, in exchange, the lender pays a fee or provides other material benefits, including revenue or profit-sharing, to the institution or to its officers, employees, or agents.
- No officer or employee of the Institution’s financial aid office (or an employee or agent who otherwise has responsibilities with respect to educational loans) will solicit or accept any gift from a lender, guarantor, or servicer of education loans. A “gift” is defined as any gratuity, favor, discount, entertainment, hospitality, loan, or other item having monetary value of more than a de minimis amount. However, a gift does not include (1) a brochure, workshop, or training using standard materials relating to a loan, default aversion, or financial literacy, such as a brochure, workshop or training; (2) food, training, or informational material provided as part of a training session designed to improve the service of a lender, guarantor, or servicer if the training contributes to the professional development of the Institution’s officer, employee or agent; (3) favorable terms and benefits on an education loan provided to a student employed by the Institution if those terms and benefits are comparable to those provided to all students at the institution; (4) entrance and exit counseling as long as the Institution’s staff are in control of the counseling and the counseling does not promote the services of a specific lender; (5) philanthropic contributions from a lender, guarantor, or servicer that are unrelated to education loans or any contribution that is not made in exchange for advantage related to education loans, and; (6) State education grants, scholarships, or financial aid funds administered by or on behalf of a State.
- No officer or employee of the Institution’s financial aid office (or employee or agent who otherwise has responsibilities with respect to education loans) will accept from a lender, or an affiliate of any lender, any fee, payment, or other 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.
- No officer or employee of the Institution’s financial aid office (or employee or agent who otherwise has responsibilities with respect to education loans) will steer borrowers to particular lenders or delay loan certifications. For any first-time borrower, the Institution will not assign, through the award packaging or other methods, the borrower’s loan to a particular lender. In addition, the Institution will not refuse to certify, or delay the certification, of any loan based on the borrower’s selection of a particular lender or guaranty agency.
- The institution will not request or accept from any lender any 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 specified loan volume, or a preferred lender arrangement. An “opportunity pool loan” is defined as a private education loan made by a lender to a student (or the student’s family) that involves a payment by the institution to the lender for extending credit to the student.
- The Institution will not request or accept from any lender any assistance with call center staffing or financial aid office staffing, except that a lender may provide professional development training, educational counseling materials (as long as the materials identify the lender that assisted in preparing the materials), or staffing services on a short-term, nonrecurring basis during emergencies or disasters.
- An employee of the Institution’s financial aid office (or employee who otherwise has responsibilities with respect to education loans or financial aid) who serves on an advisory board, commission, or group established by a lender or

guarantor (or a group of lenders or guarantors) is prohibited from receiving anything of value from the lender, guarantor, or group, except for reimbursement for reasonable expenses incurred by the employee for serving on the board. The Institution will report the receipt of any such reimbursements to the Department of Education on an annual basis. The report will include the following items:

- The amount of each specific instance of reasonable expenses paid or provided;
- The name of the financial aid official, other employee or agent to whom the expenses were paid or provided;
- A brief description of the activity for which the expenses were paid or provided.