Xavier University
Financial Aid Code of Conduct

According to the Higher Education Opportunity Act of 2008, an educational institution that participates in Title IV programs must develop and comply with a code of conduct prohibiting conflicts of interest for its financial aid personnel [HEOA § 487(a)(25)]. Xavier University's officers, employees and agents are required to comply with this code of conduct. The following specific provisions bring Xavier University into compliance with the federal law [HEOA § 487(e)].

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

2. An officer or employee of Xavier University who is employed in the financial aid office or who otherwise has responsibilities with respect to education loans shall not solicit or accept any gift from a lender, guarantor, or servicer of education loans. For purposes of this prohibition, the term "gift" means any gratuity, favor, discount entertainment, hospitality, loan, or other item having a monetary value of more than a nominal amount.

3. An officer or employee of Xavier University who is employed in the financial aid office or who otherwise has responsibilities with respect to education loans shall not accept from any lender or affiliate of any lender any fee, payment, or other financial benefit (including the opportunity to purchase stock) 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.

4. Xavier University shall not:

    a. assign any first-time borrower's loan to a particular lender; or

    b. refuse or delay certification of any loan based on the borrower's selection of a particular lender or guaranty agency.

5. Xavier University shall not request or accept from any lender any offer of funds to be used for private education loans, including funds for an opportunity pool loan, to students in exchange for the institution providing concessions or promises regarding providing the lender with:

    a. a specified number of loans made, insured, or guaranteed under Title IV;

    b. a specified loan volume of such loans; or

    c. a preferred lender arrangement for such loans.

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

7. Employees in the financial aid office shall not derive any material benefit from serving on an advisory board, commission, or group established by a lender, guarantor, or group of lenders or guarantors. These individuals also shall be prohibited from receiving anything of value from any lender, guarantor, or group of lenders or guarantors, except for reimbursement for reasonable expenses incurred in serving on such an advisory board, commission, or group.