



Financial Aid Code of Conduct

(The Higher Education Opportunity Act)

1. City Pointe Beauty Academy (hereafter referred to as The Academy) will not participate in any type of revenue-sharing arrangements with a lender. A “revenue-sharing arrangement” is defined as any arrangement between an institution and a lender under which the lender makes Title IV loans to students attending The Academy (or to families of these students). The Academy will not recommend certain lenders or the loan products of the lender, where the lender pays a fee or provides other material benefits. These benefits might include revenues or profit sharing to The Academy or to its officers or employees.
2. Employees of The Academy’s Financial Aid Office are banned from accepting gifts from a lender, guaranty agency or loan servicer. Employees of The Academy Financial Aid Office may not solicit any gift from a lender, guaranty agency, or loan servicer. A “gift” is defined and any gratuity, favor, discount, entertainment, hospitality, loan or any other item having monetary value of more than minimum amount. The term “gifts” does not include (1) a brochure, workshop, or training using standard materials relating to a loan, default avoidance/prevention, 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 Academy’s officer or employee; (3) favorable terms and benefits on an education loan provided to a student employed by The Academy, if those terms and benefits are comparable to those provided to all students at The Academy; (4) entrance and exit counseling as long as The Academy staff is 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 the state of Missouri.
3. No employee of The Academy Financial Aid Office may accept from a lender (or affiliate of any lender) a fee, payment, or other financial benefit as compensation for any type of consulting arrangement. No employee of The Academy Financial Aid Office may contract to provide services to or on behalf of a lender relating to education loans.
4. Employees of The Academy Financial Aid Office are banned from steering borrowers to particular lenders, or delaying loan certification. For any first-time borrower, The Academy may not use the awarding packaging method to assign the borrower to a particular lender. In addition, The Academy may not refuse to certify or delay the certification of any loan based on the borrower’s selection of a particular lender or guaranty agency.

5. Employees of The Academy Financial Aid Office may not request or accept from a 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. An “opportunity pool loan” is defined as a private education loan made by a lender to a student (or for the student’s family) that would involve a payment by The Academy to the lender for extending credit to the student.
6. The Academy Financial Aid Office may not request or accept from any lender any assistance with call center staffing or financial aid office staffing. The lender may provide professional development training, educational counseling materials (as long as the materials identify the lender that assisted in preparation), or staffing services on a short-term nonrecurring basis during emergencies or disasters.
7. If an employee of The Academy’s Financial Aid Office chooses to serve on an advisory board, commission, or group established by a lender or guarantor, said employee is banned from receiving any type of compensation. An exception would be reimbursement for reasonable expenses incurred by the employee for serving o the board.