

Policy Title	Student Financial Aid Code of Conduct
Responsible University Office	Office of Student Financial Affairs and Scholarships
Policy Owner	Ania Rejman Associate Director of Federal Financial Aid
Pertinent Dates	Origination Date: April, 2017 Revision Date: October, 2023 Next Review Date: July, 2026

I. SCOPE OF POLICY

The American University in Cairo (“AUC”) is committed to the development and implementation of this Student Financial Aid Code of Conduct (“Code of Conduct”) which supports compliance with federal, state and AUC policies.

II. POLICY STATEMENT

All AUC schools must comply with this Code of Conduct; with the responsibilities of an agent of AUC with respect to private education loans; and with AUC’s Conflict of Interest and Commitment Policy. This Code of Conduct prohibits: revenue sharing arrangement with any lender, receiving gifts from a lender, contracting arrangements, directing borrowers to a particular lender, offer of funds for private loans, and advisory board compensation.

III. POLICY STANDARDS AND PROCEDURES

As a participating institution in the administration of Federal Financial Aid, this Code of Conduct is in compliance with the US federal law.

Any AUC employee or agent who has responsibilities with respect to U.S. students’ federal loans must comply with this Code of Conduct as follows:

- 1.** Neither AUC as an institution, nor any individual employee, or agent of AUC shall enter any revenue-sharing arrangements with any lender. A revenue-sharing arrangement means an arrangement between AUC and a lender under which the lender provides or issues loans to students attending AUC or to the families of such students; and AUC 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 AUC or its agent.
- 2.** No employee of AUC who is employed in the financial aid office, or who otherwise has responsibilities with respect to education loans, or any of their family members, shall 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 de-minimis amount.”

3. An employee of AUC who is employed in the financial aid office or who otherwise has responsibilities with respect to education loans, or an agent who has responsibilities with respect to education loans, shall not accept from any lender or affiliate of any lender any fee, payment, or other financial benefits (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. AUC shall not, for any first-time borrower, assign, through award packaging or other methods, the borrower’s loan to a particular lender; or refuse to certify, or delay certification of any loan based on the borrower’s selection of a particular lender or guaranty agency.
5. AUC shall not request nor accept from any lender any offer of funds to be used for private education loans (non-Title IV loans), including funds for an opportunity pool loan, to students in exchange for the institution providing concessions or promises regarding providing the lender with:
 - i. specific number of loans made, insured, or guaranteed under Title IV;
 - ii. a specified loan volume of such loans; or
 - iii. a preferred lender arrangement for such loans.
6. AUC shall not request nor accept from any lender any assistance with the call center staffing, or financial aid office staffing.
7. 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, 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.

IV. APPENDICES (if applicable)

Document classification level: PUBLIC

Document accessible: <http://www.aucegypt.edu/about/university-policies>

V. CONTACT INFORMATION

Responsible University Official: Ania Rejman

Responsible University Office: Student Financial Affairs and Scholarships

If you may have any questions on this Code of Conduct or its procedures, please e-mail:

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