Financial Aid Code of Conduct

This code of conduct applies to all Albany Law School employees, including, without limitation, individuals who are employed in the Financial Aid Office or who otherwise have responsibility with respect to education loans. This code reflects Albany Law School’s continuing commitment to conducting financial aid practices with integrity, free from conflicts of interest, in the interest of students and in compliance with applicable law.

1. Albany Law School employees may not accept or solicit anything of value from any lending institution related to its education loan activity. This prohibition includes payment of fees or other benefits, including a share of the profits, as a result of the Law School recommending a lender to its students.

2. Albany Law School requires that no employee solicits or accepts gifts or anything of more than de minimus value on his or her own behalf or on behalf of another from or on behalf of a lending institution. The following activities and literature are exceptions to this ban:
   a. Brochures or training material related to default aversion or financial literacy.
   b. Food, training or informational materials as part of a training as long as that training contributes to the professional development of those individuals attending the training.
   c. Favorable terms and benefits to the student employed by the Law School as long as those same terms are provided to all students at the Law School.
   d. Entrance and exit counseling as long as the Law School’s staff are in control and they do not promote the services of a specific lender.
   e. Philanthropic contributions from a lender, guaranty agency, or servicer unrelated to education loans.
   f. State education, grants, scholarships or financial aid funds administered by or on behalf of a State.

3. Individuals employed in the Financial Aid Office and other employees who otherwise have student lending responsibilities are prohibited from consulting or providing contract services for a lending institution.

4. Albany Law School may not limit a borrower’s choice of lending institutions by assigning first-time borrowers to particular lenders, or refusing to certify or delaying loan certifications based on the borrower’s selection of a lending institution.

5. Albany Law School may not accept or solicit any funds to be used for private educational loans or opportunity pool loans in exchange for providing a lending institution with a specified number of loans, a specified loan volume or preferred lending arrangement.

6. Albany Law School may not accept or solicit staffing assistance from a lending institution, including but not limited to call center staffing or financial aid office staffing. Albany Law School shall ensure that it does not identify any employee or other agent of a
lending institution to students or prospective students of Albany Law School as an employee or agent of Albany Law School.

Albany Law School may accept assistance from a lender related to:

a. Professional development training for financial aid administrators.

b. Educational counseling materials, financial literacy materials, or debt management materials to borrowers, provided that such materials disclose to borrowers the identification of any lender that assisted in preparing or providing such materials.

c. Staffing services on a short-term, nonrecurring basis to assist the school with financial aid-related functions during emergencies, including State-declared or federally declared natural disasters, and other localized disasters and emergencies identified by the Secretary of the United States Department of Education.

7. Employees of Albany Law School may not receive anything of value from a lender, guarantor, or group in exchange for serving on an advisory board to a lending institution. They may, however, accept reimbursement for reasonable expenses incurred while serving in this capacity.