

Emory University
Office of Financial Aid
Operating Principles for Student Loan Provider Relationships

The Office of Financial Aid is committed to ensuring compliance with federal, state and university guidelines while providing exceptional customer service to families seeking financial aid assistance. We understand that our role is one of a trusted advisor and approach our professional duties with the highest ethical standards.

The Office of Financial Aid's practices related to lender-school relationships are guided by Emory University's Vision Statement and Conflict of Interest policy. The following operating principles are consistent with the documents mentioned above and include:

- **Revenue Sharing**
The Office of Financial Aid does not participate in revenue sharing arrangements whereby Emory receives compensation for student loan volume. The University shall not accept any fee or offer of funds, including funds for an opportunity pool loan in exchange for recommending a lender to its students.
- **Compensation**
Employees of the Office of Financial Aid do not accept any personal benefit from student loan providers, guarantors or loan servicers. Compensation can be defined as any gratuity, discounts or entertainment paid for.
- **Staffing Assistance**
The Office of Financial Aid will not use the services of a lending institution to make phone calls under the guise of Emory University. Lending institutions do not provide staffing to the Office of Financial Aid.
- **Lender Preferred Status**
Student loan lenders are selected for inclusion on the Office of Financial Aid's website with the best interest of the student or parent borrower in mind. Private loan lender names are displayed on the Office of Financial Aid's website link to Elm Select. Information listed on this website should be considered a starting point for analysis and comparison. Students may choose a lender based on name recognition, immediate benefit of lower origination fees, or the long-term advantage of repayment savings programs, such as an interest rate reduction, as a reward for making timely payments.
- **Advisory Board Compensation**
Staff members within the Office of Financial Aid may participate on a lending institution's advisory board if students benefit from our participation. Compensation for advisory board service is prohibited. All expenses to participate will be paid by Emory if participation is deemed prudent for our institutional goals.
- **Contracting or Consulting Arrangements**
Contracting and/or Consulting arrangements providing financial benefit from any lender or affiliate of a lender are prohibited. If the University permit a Lender to conduct information and Professional development sessions, the University must retain Control of the presentation offered by the lenders.
- **Directing Borrower to a Lender**
Students and parents are informed that they are not required to use a lender listed on ELM Select website. No lender certification outside of the Elm Select list shall be refused, nor delayed. Applications will be certified for any eligible student and lender.

Emory University Vision Statement

Emory is "a destination university internationally recognized as an inquiry-driven, ethically engaged, and diverse community, whose members work collaboratively for positive transformation in the world through courageous leadership in teaching, research, scholarship, health care, and social action."

Emory University Conflict of Interest Statement, [Policy 4.87](#)

Responsible Official: VP for Human Resources

Administering Division/Department: Employee Relations

Last Revision: June 22, 2007

Emory requires its employees to avoid any business or financial relationship, transaction or event that may be viewed, internally or externally, as a conflict of interest between an employee and an outside party. As provided in the Emory By-laws, relations between Emory and contractors, consultants, vendors, suppliers and other third parties are to be maintained without any direct or indirect personal or financial benefit accruing to any employee of Emory or any member of the employee's family. Specific circumstances, which may constitute a conflict of interest, include, but are not limited to, the following:

- Holding, either directly or indirectly, a position or financial interest* in an outside concern which provides services competitive with services rendered by Emory, or an outside concern from which Emory secures goods or services if the employee is involved in or may influence the ordering of such goods or services.
- Competing, either directly or indirectly, with Emory in the purchase or sale of property or property rights, interests or services.
- Disclosing or using non-public information obtained through Emory employment for personal profit or gain or for the profit or gain of an immediate family member.
- Accepting gratuities or special favors, such as meals, airline tickets, hotel accommodations, entertainment, sporting event tickets, etc., from any outside concern that does, or is seeking to do business with Emory, or extending gratuities or special favors to employees of Emory, under circumstances which might reasonably be interpreted as an attempt to influence the employees in the performance of their duties. This does not include the acceptance of items of nominal or minor value (\$40.00 or less) that are clearly tokens of respect or friendship and are not related to any particular transaction or activity of the university, nor does it include business-related social events where the employee is representing the university's interests.
- Retaining, directly or indirectly, consultants who have a financial interest* or employment that conflicts with services (including sponsored research) provided by Emory.

Any existing or proposed relationship, transaction or other event, which may raise a conflict of interest issue, is to be disclosed to the employee's dean, director or vice president in writing to determine its appropriateness and to receive specific approval to maintain or proceed with such relationship, transaction or event. * "Financial interest" as used in this policy does not include ownership of interests in diversified investments (e.g., mutual funds, retirement plans) where the employee or consultant does not control investment decisions, nor does it include non-controlling ownership of securities in large, publicly-held corporations unless the activities of the employee or consultant could have an other than inconsequential effect on the value of such securities. With respect to ownership in start-up and other entities utilizing university intellectual property, the Policies and Procedures for Faculty Members Involved in Sponsored Scientific Research and Technology Transfer shall supplement and take precedence over this policy where applicable. Where applicable, governmental regulations regarding conflict of interest shall be followed, as shall other university policies.