

Institutional Code of Conduct for Educational Loans

As required by the Higher Education Opportunity Act of 2008 (HEOA)

I. Financial Aid Office Ethical Guidelines: decisions and actions made or taken by any of Triad Education's, dba WCUI School of Medical Imaging ("WCUI") and Smith Chason School of Nursing ("Smith Chason"), financial aid officers or any other employees who have contact with guaranty agencies or lenders shall act within the guidelines below. A copy of this Code of Conduct will be provided on an annual basis to all WCUI/Smith Chason employees. It will also be made available on the school's website under the consumer information tab. Upon request, the Financial Aid Department will provide a paper copy to any WCUI/Smith Chason employee or student.

1. **Best Interest of the Student:** WCUI/Smith Chason will seek to establish relationships with lenders that offer the most benefit to the student in terms of interest rates, fees, repayment terms and customer services.
2. **Student Decision:** Students will be given the opportunity to choose from all private loans lenders and will not be limited to lenders or loans made available or recommended by WCUI/Smith Chason. Additionally, if WCUI/Smith Chason provides students with information on loans from private lenders, it will also provide a written reminder of the potential availability of federal student loans and a written comparison of the principal terms of such loans to the principal terms of federal student loans, including eligibility conditions, interest rates, origination fees, and repayment options and terms. WCUI/Smith Chason will not refuse to certify or delay loan certifications based on a borrower's choice of lender.
3. **Privacy of Student Records:** In accordance with federal regulation, all student financial information will be kept confidential and will not be disclosed without written student authorization with outside parties, other than the United States Department of Education (DOE), state aid agencies, lenders, servicers and guaranty agencies. Any such release will be made pursuant to FERPA regulations.

II. Prohibited Conduct: WCUI/Smith Chason directors, officers and employees ("WCUI/Smith Chason Representatives") are required to comply with this policy and to inform WCUI/Smith Chason's General Counsel if they believe there has been a violation of this policy.

1. **Relationships:** No WCUI/Smith Chason Representatives will act as an officer, associate, consultant or sales representative for any guaranty agency or lender. No financial aid officer or employee overseeing the financial aid department will serve on the board of directors of a guaranty agency or lender. No WCUI/Smith Chason employees will serve as an uncompensated member of the board of directors of any lender or serve on any advisory board for any guaranty agency or lender (unless approved in writing by WCUI/Smith Chason's CEO and/or General Counsel). WCUI/Smith Chason will not accept call center or financial aid office staffing assistance from any lender or guaranty agency.

2. **Benefits/Revenue-Sharing:** No WCUI/Smith Chason Representative will accept anything of value, other than token marketing items and nominal conference refreshments, from any lender or guaranty agency. WCUI/Smith Chason Representatives will immediately report to the WCUI/Smith Chason's CEO or General Counsel if any lender or guaranty agency attempts to offer him/her anything of value. Additionally, no WCUI/Smith Chason Representative will have a revenue-sharing arrangement with any lender or guaranty agency.
3. **Promotions/Representations:** WCUI/Smith Chason will not authorize any lender or guaranty agency to utilize its name or logo in any advertisement, publication or other communication suggesting that WCUI/Smith Chason has endorsed loans or services offered or guaranteed by the guaranty agency or lender. WCUI/Smith Chason will not allow a representative of any lender or guaranty agency to present himself/herself to the public as a WCUI/Smith Chason Representative. Similarly, no WCUI/Smith Chason Representative will be allowed to present himself/herself to the public as a representative of a lender or guaranty agency.
4. **Inducements:** WCUI/Smith Chason will not offer or provide to any guaranty agency or lender any inducement to secure any business relationship. This prohibition includes, but is not limited to, any promise of loan volume, preferred status, or any other advantage or benefit.

III. Preferred Lender List: WCUI/Smith Chason does not currently maintain a preferred lender list. If WCUI/Smith Chason were to develop such a list in the future, WCUI will give annual written disclosure to students and the U.S. Secretary of Education (and state education department, if applicable) about all lenders selected for inclusion on any list. The disclosure would explain the reasons the lenders were selected, identify the student benefits and provide the DOE's Model Disclosure Form for presentation of information required by the federal Truth in Lending Act (TILA). The Lender List would also include information on the maximum amount of federal grant, loan aid available to students, and all types of financial aid that may be available from WCUI/Smith Chason. The eligible student and/or their family will be informed that they do not have to borrow from a lender on the list. WCUI/Smith Chason's financial aid department will also be responsible for reviewing the Preferred Lender List on an annual basis and make changes when appropriate.

IV. Loan Related Disclosure Requirements: In accordance with federal regulations, WCUI/Smith Chason's financial aid officers will inform eligible borrowers of the following information:

- Eligible borrowers enrolled at WCUI/Smith Chason will be informed about the availability of and their eligibility for grant assistance from the state in which the school is located, and provide sources of information about grant assistance from other states to borrowers from other states;
- Information published by the U.S. Department of Education to students at any time that information regarding loan availability is provided. The publication includes information about rights and responsibilities of students and schools under Title IV, HEA loan programs.
- Once WCUI/Smith Chason enters into an agreement with a potential student, student, or parent of a student regarding a Title IV, HEA loan, WCUI/Smith Chason will inform the student or parent that the loan will be submitted to the National Student Loan Data System (NSLDS), and will be accessible by guaranty agencies, lenders, and schools determined to be authorized users of the data system.

- Prior to the first disbursement, WCUI/Smith Chason will provide a first-time borrower of a Federal Direct Loan with Entrance Counseling, which includes:
 - The effect of the loan on the eligibility of the borrower for other forms of aid
 - An explanation of the use of the Master Promissory Note
 - The seriousness and importance of the students' repayment obligation
 - Information on the accrual and capitalization of interest
 - Borrowers of unsubsidized loans have the option of paying interest while in school
 - Definition of half-time enrollment and the consequences of not maintaining half-time enrollment
 - Importance of contacting appropriate offices if student withdraws prior to completion of program of study
 - Sample monthly repayment amounts
 - The obligation of the borrower to repay the full amount of the loan regardless of whether the borrower complete program or completes within regular time for completion, is unable to obtain employment upon completion, or is otherwise dissatisfied with or does not receive the educational or other services the borrower purchased from the school
 - Consequences of default
 - Information about the NSLDS and how the borrower can access the borrowers records
 - Name and contact information for individual the borrower may contact with questions about the borrower's rights and responsibilities or the terms and conditions of the loan
- Exit Counseling which includes:
 - Average anticipated monthly repayment amount
 - Repayment plan options
 - Options to prepay or pay on shorter schedule
 - Debt Management Strategies
 - Use of Master Promissory Note
 - The seriousness and importance of student's repayment obligation
 - Terms and conditions for forgiveness or cancellation
 - Copy of information provided by the U.S. Department of Education
 - Terms and conditions for deferment or forbearance
 - Consequences of default
 - Options and consequences of loan consolidation
 - Tax benefits available to borrowers
 - The obligation of the borrower to repay the full amount of the loan regardless of whether the borrower completes program or completes within regular time for completion, is unable to obtain unemployment upon completion, or is otherwise dissatisfied with or did not receive the educational or other services the borrower purchased from the school
 - Availability of the Student Loan Ombudsman's office
 - Information about NSLDS. The U.S. Department of Education is required to provide a disclosure form for students and prospective students about NSLDS