

## Appendix I : GCSOM Code of Conduct for Institutional Financial Aid Professionals

### Introduction

An institutional financial aid professional is expected to always maintain exemplary standards of professional conduct in all aspects of carrying out his or her responsibilities, specifically including all dealings with any entities involved in any manner in student financial aid, regardless of whether such entities are involved in a government sponsored, subsidized, or regulated activity.

### General Principles of Conduct

1. Geisinger Commonwealth School of Medicine(GCSOM) will not accept anything of value from a lender in exchange for any advantage sought by the lending institution.
2. GCSOM employees will not accept anything of more than nominal value from any lending institutions.
3. GCSOM employees will not serve on any lender advisory boards.
4. No employee of a lender will ever work in or provide staffing to a college financial aid office or identify themselves to students as employees of the college.

### Financial Aid Officers and Employees

Geisinger Commonwealth School of Medicine's financial aid officer(s) and employees shall:

1. Refrain from taking any action for his or her personal benefit.
2. Refrain from taking any action he or she believes is contrary to law, regulation or the best interests of the students and parents he or she serves.
3. Ensure that the information he or she provides is accurate, unbiased, and does not reflect any preference arising from actual or potential personal gain.
4. Be objective in making decisions and advising his or her institution regarding relationships with any entity involved in any aspect of student financial aid.
5. Refrain from soliciting or accepting anything of other than nominal value from any entity involved in the making, holding, consolidating or processing of any student loans, including anything of value (including reimbursement of expenses) for serving on an advisory body or as part of a training activity of or sponsored by any such entity.
6. Disclose to his or her institution, in such manner as his or her institution may prescribe, any involvement with or interest in any entity involved in any aspect of student financial aid.

Preferred Lender Lists - GCSOM currently does not use a preferred lender list.

If GCSOM uses a preferred lender list, the following standards shall be observed and maintained:

1. A preferred lender list, if offered, will be based solely on the best interests of the students or parents who may use the list without regard to financial interests of GCSOM.
2. A preferred lender list, if offered, will have at least 3 or more unaffiliated lenders.
3. A preferred lender list, if offered, will clearly and fully disclose the criteria and process used by GCSOM to select the lenders on the list. Students will be told that they have the right and ability to select the lender of their choice regardless of the preferred lender list.
4. Lenders listed on a preferred lender list, if offered, must first disclose if the lender has any agreement to sell its loans to another lender
5. A preferred lender list, if offered, will provide comparative information on borrower benefits offered by all lenders, including, but not limited to, lenders' interest rates and loan terms and conditions.
6. GCSOM will endeavor to select lenders with the best borrower benefits, including, but not limited to, lenders' interest rates and loan terms and conditions, for its preferred lender list, if offered.
7. GCSOM will annually update its preferred lender list, if offered.
8. GCSOM will not unnecessarily delay certification of a loan from any lender chosen by a student if the lender is not one listed on its preferred lender list, if offered.
9. GCSOM will not be involved with any lender who undertakes philanthropic activities in exchange for federal student loan applications, volume, or placement on a school's preferred list.