

# Code of Conduct

Houston Graduate School of Theology does not offer or facilitate the origination of private student loans and, thus, has no lending relationship with any student loan provider other than the William D Ford Direct Loan Program through the Department of Education.

- No staff member shall accept any gift from a representative of a student loan provider. The Department of Education has defined "gift" as:
  - "Any gratuity, favor, discount, entertainment, hospitality, loan or other item valued at more than a de minimus amount.
  - The term includes services, transportation, lodging, or meals, whether provided in kind, by purchase of a ticket, payment in advance, or by reimbursement."
- Staff can participate in meals, refreshments, and receptions in conjunction with professional association meetings, trainings, or conference events open to all attendees.
- **Brochures promoting specific loan products will not be displayed or stored in any area of the office.** Brochures dealing with financial literacy issues can be displayed as long as they do not mention any specific loan product.
- Staff members are free to pursue part-time employment outside of their scheduled work day. However, any staff member who is approached by a lender with an offer for supplemental employment will provide full written details to his/her supervisor. Staff members **cannot** accept supplemental employment with lenders that creates any potential "conflict of interest" with the operations of the Office of Scholarships and Financial Aid.
- Staff members shall not accept **any** remuneration **or** expense-reimbursement for serving as a member of a lender's advisory board. Service on a lender's advisory board **MUST** be approved by a supervisor; Staff may participate on advisory boards that are unrelated in any way to higher education loans.
- Houston Graduate School of Theology does not currently require staff to complete and submit financial disclosure forms as a condition of employment. All staff members in the Office of Scholarships and Financial Aid will disclose to his or her immediate supervisor if an assigned task could create a perceived or real "conflict of interest" in the eyes of the public.

Employees of HGST who knowingly fail to follow these guidelines will be subject to disciplinary action.

- Houston Graduate School of Theology does not have a revenue-sharing arrangement with any student loan provider. These agreements are prohibited.
- Lender account representatives are not permitted to work within the Office of Scholarships and Financial Aid or to pass themselves off as employees of the seminary.

These guidelines also apply to **any staff member or faculty** at Houston Graduate School of Theology who may have dealings with student loan providers.