



BIRTHINGWAY COLLEGE OF MIDWIFERY

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Portland, Oregon 97266
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Title IV Loan Program Code of Conduct

Birthingway generally discourages students from borrowing “alternative” or “private” loans unless absolutely necessary. The institution does currently maintain a preferred lender list, but does make recommendations of one lender in favor of another.

The following Code of Conduct satisfies requirements set by the Higher Education Opportunity Act (HEOA) and reflects Birthingway’s commitment to provide our students with sound and unbiased financial aid information. This Code of Conduct applies to the institution, and includes all staff and faculty members.

1. The institution will make no revenue-sharing agreements with any lenders. Birthingway will not recommend or use a specific lender in exchange for a fee or any other material benefits, including revenue or profit-sharing.
2. The Financial Aid Officer will not solicit or accept any gifts, including gratuity, favors, discounts, entertainment, hospitality, loan or other items having significant monetary value, from lenders, guaranty agencies or loan servicers. The ban on gifts does not include the following:
 - a. Brochures, workshops or trainings using standard material related to loan, default aversion or financial literacy. In addition, this ban will not extend to food, training or informational material provided as part of such a training session if the session contributes to the professional development of the Financial Aid Officer.
 - b. Favorable terms and benefits on an educational loan for students employed by the institution, so long as these benefits are comparable to other Birthingway students.
 - c. Entrance or exit counseling, as long as the counseling does not promote services of a specific lender and is controlled by the Financial Aid Officer.
 - d. Philanthropic contributions unrelated to educational loans that are not made in exchange for preferential treatment.
 - e. State education grants, scholarship or funds administered by or on behalf of Oregon State.
3. The Financial Aid Officer will accept no fee, payment or financial benefit from any lender as compensation for a consulting or contracting arrangement that provides educational loan-related services to, or on behalf of, a lender or affiliate.
4. Should a student elect to use a private or alternative loan, the institution will make every effort to see that the borrower is well educated and their ability to choose protected. The

institution will not require a borrower to use specific lenders nor delay loan certifications. In addition, the institution will never assign a student borrower to a specific lender without the borrower's permission nor refuse to certify the lender of the borrower's choosing.

5. The institution will not accept or request private loan funds in exchange for the following promises to the lender:
 - a. a specific number of loans made, insured or guaranteed,
 - b. a specified loan volume or
 - c. a preferred lender arrangement.

Further, the institution will not engage in "opportunity pool loans". These are loans made by a lender to a borrower, in which the institution makes a payment to the lender for extending credit to that borrower.

6. Birthingway will not request any staffing assistance from any lender, even in case of emergency or disasters. Staffing assistance does not include professional developmental training or educational materials, as long as the lender is clearly identified in the preparation of such trainings and materials.
7. Employees involved with financial aid in any capacity and who serve on a board or group established by a lender may not receive anything of value from the lender, guarantor or group. Reimbursement for reasonable expenses incurred for serving, however, is acceptable.