

CODE OF CONDUCT FOR EDUCATION LOANS

CITSTS is a member of NASFAA (National Association of Student Financial Aid Administrators) and as such conforms to NASFAA's Code of Conduct for Educational Loans guidelines in accordance with the Code of Conduct last updated by NASFAA's Board of Directors in November 2020 and published in January 2021. Subject to enforcement procedures that went into effect July 1, 2015, NASFAA institutional members ensure that:

1. No action will be taken by financial aid staff that is for their personal benefit or could be perceived to be a conflict of interest.
 - a. Employees within the financial aid office will not award aid to themselves or their immediate family members.
 - b. Circle in the Square does not provide a preferred lender list for personal loans. Borrowing is up to the discretion and choice of the borrower.
 - c. A borrower's choice of a lender will not be denied, impeded, or unnecessarily delayed by the institution.
 - d. No amount of cash, gift, or benefit shall be accepted by a financial aid staff member from any financial aid applicant (or his/her family), or from any entity doing business with or seeking to do business with the institution (including service on advisory committees or boards beyond reimbursement for
e. reasonable expenses directly associated with such service).
2. Information provided by the financial aid office is accurate, unbiased, and does not reflect preference arising from actual or potential personal gain.
3. Institutional financial aid offers and/or other institutionally provided materials shall include the following:

- o Breakdown of estimated individual Cost of Attendance components, including
 - which are direct (billed by the institution) costs vs. indirect (not billed by the
 - institution) costs
 - o Clear identification and proper grouping of each type of aid offered indicating whether the aid is a grant, scholarship, loan, or work program
 - o Estimated net price
 - o Standard terminology and definitions, using NASFAA's Glossary of Financial
 - Aid Terms
 - o Renewal requirements for each aid type being offered as well as next steps
 - and financial aid office contact information
4. All required consumer information is labeled as "Consumer Information" and displayed in a prominent location on the institutional website. A printed version of this information will be provided upon request.
5. Financial aid professionals will disclose to their institution any involvement, interest in, or potential conflict of interest with any entity with which the institution has a business relationship.