Code of Conduct for Educational Loan Practices

Amended as of 9/23/2026

The Higher Education Opportunity Act requires institutions participating in the administration of educational loan programs to develop and publish a Code of Conduct. Any Western Michigan University Homer Stryker M.D. School of Medicine, herein referenced as WMed, officer or employee with responsibilities tied to students' educational loans is required to comply with this Code of Conduct as outlined below.

1. **No revenue sharing amongst WMed and lenders**
    - Neither WMed nor its Financial Aid employees may accept any fee, payment, nor anything of value from a lender.
2. **No soliciting or accepting gifts**
    - Neither WMed nor its Financial Aid employees will accept or request anything of value from any lender.
3. **No solicitation or acceptance of any fee, payment, or other financial benefit as compensation**
    - No Financial Aid employee of WMed may accept or request items, services, or goods in exchange for consulting or providing services to or on behalf of a lender relating to educational loans
4. **Borrowers are free to borrow from any lender of their choosing without repercussion**
    - Borrowers will not be assigned private lenders by WMed
    - WMed and its Financial Aid employees may not refuse to certify/delay certification of any loan based on the borrower’s selection of a particular lender
5. **WMed will not accept or request any offer of funds for private education loans (defined in section 140 of the Truth in Lending Act) to students in exchange for the WMed providing concessions/promises about providing lender with:**
    - Number of loans made, insured, or guaranteed under title
    - Loan volume of such loans
    - Preferred lender agreements for such loans
6. **WMed will not request or accept any assistance with Financial Aid staffing**
    - Assistance is permitted for the following instances:
        i. Professional development training for Financial Aid administrators
        ii. Educational counseling materials, financial literacy materials, or debt management materials to borrowers, provided that such materials disclose the identification of lenders involved in the gathering of materials