

# ICAOM

## Title IV Code of Conduct

The following code of conduct, address conflicts of interest for ICAOM financial aid personnel that may include its officers, employees, and agents:

1. ICAOM and its officials will not participate in any revenue-sharing arrangement with lenders. This is defined as any arrangement between school and lender that results in the lender paying benefits or a share of its profits to the school or its employees as a result of the school recommending a lender to its students or their families.
2. ICAOM and its employees of the Financial Aid Office shall neither solicit nor receive gifts from any lender, guaranty agency, or loan servicer. The term "gift" means any gratuity, favor, discount, entertainment, loan, or other item of significant monetary value.
3. Officers or employees of ICAOM who are employed in the Financial Aid Office will not accept a fee, payment or financial benefit as compensation to provide services to or on behalf of a lender, relating to educational loans.
4. The Financial Aid Office at ICAOM will not steer borrowers to particular lenders by assigning students lenders through award packaging or through other practices; nor will the Financial Aid Office delay loan certifications based on a borrower's choice in lenders.
5. ICAOM shall not accept any offers of funds for private loans, including funds for an opportunity pool loan in exchange for providing a lender with a specific number or volume of loans, or for a preferred lender arrangement for such loans.
6. ICAOM shall not request nor accept any agreement or offers of assistance from any lender with call center or financial aid office staffing.
7. The Financial Aid Office and any employee of ICAOM, Advisory Board, commission, or group established by a lender, guarantor or group of lenders or from any of the above mentioned, except that the employee may be reimbursed for reasonable expenses incurred in service on such board, commission or group.