

**For Students Participating In
Consumer Loans or Federal Financial Aid**

Important Notice:

All students attending Elevate Salon Institute may **choose** to use a lender not on a preferred lender list. The Institute is required to process loan documents for any eligible lender selected by students.

Students are not required to use any federal or private lender recommended by The Institute and may select any lender of the student's choice.

Terms offered by preferred lenders are equally available to all of The Institute's eligible students.

The Institute's financial assistance / aid staff shall conduct a **performance review** of its preferred lenders at least once every 12 months and make changes when appropriate.

Elevate Salon Institute's primary goal is to assist students in achieving the educational career goals by providing appropriate financial resources. The financial aid/ assistance office is committed to:

- Making every effort to assist students and families with their financial need
- Inform students and remove financial barriers for those desiring to further their education
- Educating students and families concerning consumer information and all forms of aid available for those who qualify
- Protecting and respecting the privacy of students
- Ensuring the confidentiality of student records and personal circumstances
- Performing a needs analysis in a consistent manner for each student
- Providing services that do not discriminate on the basis of race, gender, religion, age, economic status, ethnicity or sexual orientation
- Attending training seminars after approved for Title IV funding to stay current with all Department of Education regulations
- Remaining at the highest level of ethical behavior
- No Co-branding or sharing of logos with the lender(s)

Elevate Salon Institute financial assistance/aid office is expected to always maintain ideal standards of professionalism in relation to interacting with students and families while carrying out the responsibilities of their position. All Institute staff involved will:

- Remain objective in making decisions and advising in relation to the student's financial aid
- Provide accurate information without any personal bias
- Abstain from taking any actions for personal benefit
- After approved for Federal funding, follow the Title IV laws and regulations
- Will keep the best interest of the student and families first and foremost
- Refrain from soliciting or accepting gifts from loan agencies, or any government agency

Code of Conduct / Institute Ethics

Federal Reserve Board and Department of Education final rules for private education loans and Title IV Funding replaces prior special rules for student credit extension.

The Federal Reserve Board (FRB) regulates required disclosures on private education loans and defines certain key terms. The Department of Education (ED) regulates the required disclosures on Title IV Aid, HEA loans and private education loans.

The Higher Education Opportunity Act (HEOA) defines:

- **An Institution-affiliated organization** is an entity directly or indirectly related to a covered institution that recommends, promotes, or endorses education loans.
- **Lender**-an eligible private education lender or any other person engaged in the business of securing, making or extending education loans on behalf of the lender.
- **Private education loan**-is a non-Title IV loan provided by a private educational lender expressly for post-secondary educational expenses and does not include an extension of credit under an open-end consumer credit plan or secured by real property.
- *Private educational loans and Title IV loans are not in any way related.*
- The Institute is not considered a private lender if the extension of credit is 90 days or less and interest will not be applied to the credit balance and the term is one year or less, even if payable in more than 4 payments.
- **Preferred lender arrangement** is an arrangement or agreement between a lender and covered institution in which a lender provides education loans to students/families and the covered institution recommend, promotes or endorses the education loan products of the lender.
 - Includes arrangements between a lender and an institution-affiliated organization
 - Does not include:
 - Direct Loan Program Loans through the Dept. of Ed
 - Education funds covered by The Institute’s own funds
 - Funds by donor-directed contributions
 - State funded financial aid programs if the terms and conditions of the loan include a loan forgiveness option for public service
- **An Education loan** is a Direct Loan or a private education loan. *The terms and conditions of the Title IV, HEA program loans may be more favorable than the provisions of the private educational loans.*
- **Preferred Lender Arrangement (PLA)** – The Institute will provide disclosures annually for each type of education loan offered pursuant to the PLA before a student borrows.
 - **Informational materials**-publications, mailings or electronic messaging will be distributed to prospective and current students describing the available financial assistance opportunities.
 - The disclosure will not include any co-branding and must conspicuously disclose that The Institute does not endorse the product in question.
 - The Institute has **not less than two** unaffiliated **private education lenders**. The following chart lists the lenders and the reasons The Institute chose these lenders in respect to loan terms and conditions and the methods or criteria used to select these lenders in relation to why they are favorable to borrowers.

Preferred Private Lenders	Criteria for Selection	Reason favorable to borrower	Related to other lenders on list <i>Yes or No</i>
1. Tuition Financing Rate	Able to offer a competitive interest rate of 4%	The start date of repayment can be chosen in collaboration with the student and loan representative	No

2. Citizens Bank	Can provide longer loan terms than TFC	Can provide longer loan terms which can make borrowing more affordable	No
------------------	--	--	----

- Disclosure for Direct Loans is found in the model disclosure form developed by the Dept. of Ed.
- The Institute offering private loans will concurrently provide information in the form of a private lender model disclosure form.
- The Institute does not require students to borrow from any of the preferred lenders.
- The Institute will not deny the borrowers choice of lender.
- Method/criteria used to choose lenders is without prejudice, based on the borrowers best interest and for the sole benefit of students attending The Institute.
- The Institute will provide borrowers or notify borrowers where to find the Truth in Lending Act (TILA) disclosures for each lender.
- Institute's approved for Title IV aid will inform borrowers of all Title IV eligibility and the terms and conditions of the Title IV aid in comparison to the private education loans.
- The Institute approved for Title IV aid will provide a clear distinction between the presentations of the Title IV aid in relation to the presentation of the private loans.
- The Institute approved for Title IV Aid will provide, upon the applicant's request, a self-certification form developed by the Department of Education along with any information The Institute has been provided to complete the required form before giving, upon the applicant's request, a self-certification form from a private lender.
- The Institute will not agree to use in marketing, the private lenders name, emblem, or share the logo or pictures of The Institute with the lender, which could imply the loan is offered or made by The Institute or affiliate.
- The Institute will ensure the lender's name is shown in all information/documentation related to the loan.
- The Institute will submit to the Department of Education an annual report that includes:
 - Truth In Lending Disclosures of each lender on the preferred lenders list
 - Detailed reasons why The Institute participates with each private lender and reasons why the lender is beneficial to the borrower and their families
 - Report will be available to the public, including both current and prospective students
 - The minimum information the Department determines will be disclosed.
 - The information in the report is available, upon request, to the public and is provided to current students and students planning to attend The Institute and their families.
- **Code of Conduct Requirements for The Institute – Affiliated Organizations**
 - The Code of Conduct will be displayed in plain sight on The Institute's website.
 - The Institute will administer, enforce, and review the Code of Conduct for all Institute staff involved annually.
 - Lenders are also required to enforce and review the same Code of Conduct with the affiliate's agents annually.
 - The Institute prohibits a conflict of interest between The Institute FAA and the preferred lenders.
 - The Institute does not promote any lender during the Entrance/Exit Interview process.
 - The Institute does not promise any loan volume to any preferred lender.
 - The Code of Conduct prohibits revenue-sharing arrangements with any lender.
 - The Institute will not collect a fee in exchange for promoting a lender nor collect any revenue or profit sharing.
 - The Financial Aid Department or Administrator or Owner will not receive gifts from any preferred lender.
 - "Gifts" include: gratuity, favor, discount, entertainment, hospitality, loan, services, transportation, lodging, meal, or other items deemed as a "gift".
 - The term "gift" does not include: food or refreshments during a professional training session meant to improve service and does not include favorable terms to student,

