



With passage of federal regulations that have essentially eliminated the bank-based FFELP program, students no longer borrow their federal loans through private lenders. As such Chaminade does not maintain a list of preferred student loan lenders. It does provide a list of lenders in the financial aid section of its website, www.chaminade.edu, which reflect lenders who provide private alternative loans. Chaminade provides this listing as a service to its students and its publication is not meant to suggest that these are the only lenders available, nor connote any endorsement or recommendation of said lenders on the part of Chaminade. The following disclosure statement, established and approved during the FFELP program, shall be maintained for current Chaminade financial aid employees in as much as there exists private alternative loans still being offered by private lenders.

**DISCLOSURE STATEMENT
CONFLICTS OF INTEREST
Financial Aid Office
Chaminade University of Honolulu (CUH)**

Pursuant to University Policy Chaminade employees are expected to perform their responsibilities honestly and in good faith and in accord with principles of loyalty and fidelity to Chaminade University. Employees who have an actual or potential conflict of interest have an obligation to disclose the conflict in a timely fashion, so that the University can determine how best to manage the conflict. Sensitivity to potential conflicts of interest is particularly important for members of the Financial Aid Office since they must be perceived as objective, free from bias or undue influence, professional and fair in performing their duties and helping to meet the needs of students and their families in the financial aid process.

Members of the Financial Aid Office will submit this disclosure statement to the Director of Financial Aid at the time of hire and at least annually at the beginning of each fiscal year thereafter, with a copy to the Dean of Enrollment Management. (The Director of Financial Aid will submit a disclosure statement to the Dean of Enrollment Management, with a copy to the CUH Compliance Officer.) If an actual or potential conflict or other relationship that may be perceived as impairing objectivity arises during the year, the employee will immediately submit an updated disclosure statement. Sufficient facts and circumstances should be timely and truthfully disclosed so that the actual or potential conflict can be immediately and adequately evaluated and managed.

In signing the disclosure form, members of the Financial Aid Office will also attest that they are complying with the following Code of Conduct:

- Employees must not receive anything of value from any lending institution or other vendor in exchange for providing an advantage to the lender. Employees shall not receive any consulting fees, payments or stock from any lender.
- Employees are prohibited from receiving any gifts or anything else of value from a lending institution that is greater than *de minimus* value (\$100 or less).
- Employees will not serve on the advisory board for any lending institution without the prior written approval of the Dean of Enrollment Management and, if such approval is granted, the Employee will not receive anything of more than *de minimus* value (\$100 or less) for such service from the lender, including any consulting fees or payment or reimbursement for travel, lodging or meals by such lender or its agent.
- Any investments by an employee or the spouse/domestic partner of an employee in a lender must be a passive investment in publicly traded stock or mutual funds and must be disclosed to the Director of Financial Aid and Dean of Enrollment Management. (The Director of Financial Aid, in turn, will disclose said information to the Dean of Enrollment Management and the CUH Compliance Officer.) Any employees with such



investments shall not participate in the review or selection of lenders on any preferred lender list, and shall not favor any lender in which they have investments in providing any advice or services to students.

- Employees must disclose if any spouse, domestic partner or other immediate family member (e.g., parent, child, and sibling) is employed by a lender which provides or may provide loans or other financial aid resources or services for students.

I have read the above statements regarding conflicts of interest and a Code of Conduct, and I certify, except as fully described in the **Disclosure** section below or on a separate sheet attached to this form:

I have complied and will continue to comply with the Code of Conduct for Financial Aid Office Employees, as it may be amended from time-to-time.

I have no financial or other relationship with any University individuals or entities, any lenders or any other individuals or entities that could reasonably be interpreted to present a conflict of interest, to impair my objectivity or to cause me to be viewed as not objective in the performance of my duties.

No close relative, spouse, or domestic partner of mine has a financial or other relationship with any outside individuals or entities that could reasonably be interpreted to present a conflict of interest on my part, to impair my objectivity or to cause me to be viewed as not objective in the performance of my duties.

I know of no other situations that could reasonably be perceived as impairing my objectivity or causing me to be viewed as having a conflict of interest in the performance of my duties.

Disclosure:

Name: _____ Date: _____

Signature: _____

Received, Reviewed and Appropriate Action Taken:

Director of Financial Aid: _____

Date: _____



Cc: Dean of Enrollment Management

For Director of Financial Aid

Received, Reviewed and Appropriate Action Taken:

Dean of Enrollment Management: _____

Date: _____

Cc: CUH Compliance Officer