

FEDERAL LOAN CODE OF CONDUCT AND DISCLOSURE

Federal education loans are a type of financial aid that is available to qualifying Advanced Training Associates (ATA) students and their parents. It is important for you to understand ATA position with respect the Lenders, which are defined to include:

- Private lenders who make loans through the Federal Loan Programs that you and or your parents can use to help pay the cost of an ATA education;
- The entities that service, guaranty and or/securitize those loans; and
- The entities, such as trade of professional associates that receive money related to loan activities from those private lender, services, guarantors and securitizes.

CODE OF CONDUCT: ATA has adopted the following code of conduct with respect to these lenders:

1. ATA officers, employees, agents, directors and trustees (collectively, “Employees) shall avoid real and perceived conflicts of interest between their duties and responsibilities at ATA and the Loans of their student financial aid made available to qualifying ATA students and their parents.
2. No ATA Employee shall knowingly solicit, accept or receive any Gift (as defined below from or on behalf of a Lender in connection with or related to his or her duties or responsibilities at ATA.
3. No Employee who is employed in the institute’s Financial Aid Department or has any direct responsibilities with respect to student financial aid will serve or participate on a Lender’s advisory board, consult with a Lender of otherwise advice a Lender.
4. an Employee, who in not employed in the institute’s Financial Aid Department or does not have any direct responsibilities with respect to the students financial aid, may serve on any board of any publicly traded or privately held company and solicit, accept and receive remuneration of or expense reimbursement related thereto, regardless of whether that company is a Lender.
5. ATA shall not knowingly:
 - Solicit, accept of receive any Gift from or on behalf of a Lender in exchange for any advantage or consideration provided to that Lender related to the Lender’s Loan activities;
 - Solicit, accept or receive any payments, referral fees, revenue sharing or similar financial arrangements from any Lender as a financial inducement for referring or recommending that Lender to its student and parent borrowers;
 - Permit any employee or other agent of a Lender to:
 1. Identify himself or herself to ATA’s student or parent borrowers as an Employee, representative or agent of ATA; or
 2. Work in the ATA Financial Aid Department.

- Direct any of its student or parent borrowers to any electronic promissory note or other loan agreements with respect to any Loans that do not provide the student or parent borrowers with a reasonable and convenient alternative to select their Lender for a particular type of Loan and complete that Lender’s Loan documentation; or
 - Request, accept or consider from any Lender any offer of funds to be used for Federal Loans to its student or parent borrowers, in exchange for ATA providing concessions of promises to the Lender that may prejudice any other of its student or parent borrowers.
6. If ATA refers or recommends any Lender to its student or parent borrowers, ATA shall:
- Disclose the process by which it selected the Lender, including the method and criteria that it used in determining to refer or recommend the Lender and the relative importance for those criteria;
 - Disclose to students and their parents that they are free to use any Lender;
 - Only refer or recommend a Lender that, as a whole, it has determined offers Loans that have competitive rates, terms, borrower benefits, services and loan administration (collectively, “Terms”);
 - Review annually the competitiveness of the Terms of the Loans offered by the Lender that it refers or recommends to its student or parent borrowers;
 - Update annually the Lender that it refers or recommends to its student and parent borrowers;
 - Obtain each Lender’s assurance that any repayment benefits that the Lender advertised with respect to the Loans made to its student and parent borrowers will continue to apply to those Loans, regardless of whether the Lender sells those Loans;
 - Inquire whether the Lender has any agreement to sell the Loans made to its student and parent borrowers to an unaffiliated Lender and, if the Lender informs ATA that the Lender has such an agreement, ATA will disclose that information to its student and parent borrowers; and
 - Not refer or recommend any Lender more favorably for a particular type of Loan, in exchange for the Lender providing more favorable Terms to student and parent borrowers in connection with a different type of Loan.
7. “Gift” is defined as any money, discount, favor, gratuity, inducement, loan, stock, prize or thing of value, including without limitation, any entertainment, hospitality, service, honoraria, transportation, lodging, meal, registration fee, forbearance, promise, computer hardware or printing, whether provided in kind, by purchase of a ticket, payment in advance or by reimbursement. A “gift” does not include, however, any of the following:
- Standard informational material related to a Loan, financial literacy or debt management, or a Lender’s promotional material;

- Training or information material furnished to an employee as an integral part of a training session that is designed to improve the Lender's service to ATA, if such training contributes to the professional development of the Employee;
- Meals, refreshments and receptions furnished to an Employee that are reasonable in cost and scheduled in conjunction with training, meeting or conference events, if those items are open to all attendees at the event;
- Toll-free telephone numbers for use by ATA, Employees or others to obtain information about Loans;
- Free data transmission service for us by ATA to electronically submit processing information or status confirmation data with respect to Loans made to, or applied for by student and parent borrowers;
- Favorable Terms on an educational Loan provided to a student employed by ATA, if such Terms are comparable to those available to all ATA students;
- Financial literacy-related outreach and default aversion activities provided by Lender, excluding in-person required initial or exit counseling provided to student borrowers to meet ATA's responsibilities under federal law, provided that:
 1. The name of the entity that developed and paid for any materials used in conjunction with those activities is provided to the participants; and
 2. The Lender does not promote its Loans or other products during such activities;
- A Gift to a family member of an Employee, or to any other individual based on that individual's relationship with an Employee, if:
 1. The Gift was given without the knowledge or acquiescence of the Employee; or
 2. The Employee has no reason to believe that the Gift was given because of the Employee's duties or responsibilities at ATA.
 3. Items of nominal value that are offered as a form of generalized marketing or advertising or to create good will; and
 4. Other services provided by Lenders to ATA or an Employee that are identified and approved by the U.S. Department of Education.

DISCLOURE:

1. All ATA officers, employees and agents with responsibilities for Loans or other student financial aid are required to obtain annual training on the Code of Conduct above.

2. You and your parents:

- **Are advised to consider all federal student financial aid available at ATA for those that qualify, which:**
 1. **is specified in ATA's school catalog;**
 2. **includes Federal Education loans, which are guaranteed by the Federal Government and, therefore, charge lower rates of interest and may offer other more favorable Terms than private educational loans;**
 3. **is explained in detail in The Guide to Federal Student Aid, which is published by the U. S. Department of Education and available at:**

http://studentaid.ed.gov/students/publications/student_guide/index.html

- **have the right and ability to select the Lender of your choice;**
- **are not required to use any Lender referred or recommended by ATA;**
and
- **Will not be penalized for selecting a Lender that is not referred or recommended by ATA.**

3. ATA does not have preferred lender list.

4. Federal Loans that you may receive will have the same repayment benefits advertised with the respect to any Loans that you obtain from any of the Federal Lender will continue to apply to you Loans, regardless of whether that Federal Lender sells your loans.

5. ATA does not receive any payments, referral fees, revenue sharing or similar financial arrangements from any of the Federal Loans that a student of parent borrower chooses.

6. ATA encourages you and your parents to:

- Shop around to obtain Loans from Lenders who offer the best combination of Terms for you particular circumstances;
- Make certain that all repayment benefits advertised by the Lender with respect to your Loans (such as discounts for certain number of consecutive timely Loan payments) are specified in your Loan document and will remain part of the Terms if the Loans are subsequently sold by the Lender.

ATA's Financial Aid professionals are available to assist you and answer any question that you may have regarding the Federal Education Loans available to those that quality.