

CODE OF CONDUCT	Fundación Universidad de las Américas Puebla	DATE: 19/09/19	
COD-135-01	U.S. DEPARTMENT OF EDUCATION CODE OF CONDUCT APPLICABLE TO UDLAP EMPLOYEES	P 1/5	ED.1.0
REVIEWED BY: Mario Vallejo Pérez Finance and Institutional Development Vice		AUTHORIZED BY: Dr. Luis Ernesto Derbez Bautista President	

Article 1 All members of Universidad de las Américas Puebla involved in the recruitment process, school duties, and management of the U.S. Department of Education Federal Student Aid Program, as well as those students who belong to said program, are subject to the regulations of this Code of Conduct.

Article 2 All employees involved must

- a. Behave ethically and professionally in all activities or decisions.
- b. Avoid conflicts of interest.
- c. Act with honesty and justice.
- d. Avoid distinctions by race, gender, religion, disability, age or economic situation.
- e. Protect the privacy of students' financial and personal information through physical and electronic security mechanisms based on the **Policy for Personal Data Protection** and the corresponding **UDLAP Privacy Notice**.
- f. Exercise their professional judgment following the U.S. Department of Education guidelines and policies, and based on the corresponding support or evidence.
- g. Advise and provide the necessary information to the candidates and participants of the U.S. Department of Education Federal Student Aid Program so students reach their educational goals.

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Article 3 All employees involved in recruiting or managing the program must know the rules and regulations applicable to the U.S. Department of Education Federal Student Aid Program and carry out their functions in adherence to these rules and regulations; therefore, they must satisfactorily complete the online introductory course to the U.S. Department of Education Federal Student Aid Program and sign up for the email messaging service in the *Information for Financial Aid Professionals* (IFAP) website to receive weekly updates and changes to the aforementioned program. Likewise, they must adhere to the institutional regulations for the correct performance of the program. Employees can contact the University's program administrator in case they have questions or doubts.

Article 4 Employees involved in the program, according to their responsibilities, must act with transparency and clarity when carrying out their activities, guaranteeing that

- a. They offer students and parents the necessary information to make decisions regarding the payment of their tuition and attendance to the University.
- b. Assign the funds of the U.S. Department of Education Federal Student Aid Program in accordance to the Department's guidelines, consistently calculating the amount to cover the economic needs of candidates.
- c. Inform students and parents of any changes to the U.S. Department of Education Federal Student Aid Program that could affect a students' eligibility.

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- d. Guarantee that the budget for the support offered to candidates and students be determined based on a realistic expectation of expenses.
- e. Inform the University of any connections, interests or potential conflict of interest.

Article 5 The employees involved must guarantee that the students' and parents' sensible information is protected in accordance to the Federal Law of Protection of Personal Data in Possession of Third Parties and the University's ***Policy for Personal Data Protection***.

Likewise, this information must be safeguarded according to the policies established by the U.S. Department of Education, and be used only for the purposes of the Title IV program of the US Higher Education Act.

Article 6 Employees involved in the program are prohibited from

- a. Allocating aid for themselves or for direct family members up to second-degree kinship. They must remove themselves from this task and leave it for someone designated by the institution in order to avoid any conflict of interest.
- b. Accepting any type of compensation, payment, gift, benefit or money from applicants, their families, moneylenders or loan management company.
- c. Receiving bonuses to include new students to the U.S. Department of Education Federal Student Aid Program.
- d. Carrying out agreements to divide income with any moneylender.

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- e. Establishing a contract agreement that provides financial benefits to any moneylender or their associates.
- f. Directing borrowers to moneylenders, or rejecting or delaying loan certifications.
- g. Offering funds for private loans.
- h. Establishing a call or assistance center for Student Aid Office personnel.

Article 7 All guidance for candidates or University students is free of charge. Likewise, there will be no charge for applying to the U.S. Department of Education's Federal Financial Student Aid Program.

Article 8 This Code of Conduct is in line with the ***Code of Ethics of Fundación Universidad de las Américas Puebla*** and other applicable regulations.

Article 9 Any situation not foreseen in this code of conduct will be analyzed and authorized by the President or the person he/she designates.

Transitory

This Code of Conduct repeals all previous regulations on this topic and is valid starting the day after it is published on the Intranet.

Directly Related Documents

UDLAP-02 Code of Ethics of Fundación Universidad de las Américas Puebla

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POL-006-03 Policy for Personal Data Protection

UDLAP Privacy Notice

Change History

Edition	Change description	Change date
1.0	New document	September 2019

Annexes

This Code of Conduct has no annexes.