



# Education Loan Practices

<b>Responsible Officer:</b>	VP - Student Affairs
<b>Responsible Office:</b>	SA - Student Affairs
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## I. POLICY SUMMARY

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The Policy on Education Loan Practices (“Policy”) establishes requirements for the availability, financial terms, and servicing of education loans at the University of California (University or UC) in three general areas: practices related to University Loans, practices related to helping students identify and receive non-federal loans, and the University code of conduct regarding preferred lender arrangements.

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## II. DEFINITIONS

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**Direct Loans:** Federal loans available to eligible undergraduate, graduate and professional students and eligible parents of dependent undergraduate students. Includes Direct Subsidized Loans, Direct Unsubsidized Loans, and Direct PLUS Loans.

**Direct PLUS Loan:** A federal loan available to eligible graduate and professional students and eligible parents of dependent undergraduate students to help pay for education expenses not covered by other financial aid up to the cost of attendance after Direct Subsidized Loan and Direct Unsubsidized Loan eligibility limits have been reached.

**Direct Subsidized Loan and Direct Unsubsidized Loan:** Federal loans available under the Direct Loan Program to help eligible students pay for their education expenses. Direct Subsidized Loans are available to undergraduate students who demonstrate need with annual loan limits based on grade level; interest does not accrue on these loans while the student is enrolled. Undergraduate students who do not demonstrate need, undergraduates who need additional loan funds beyond their subsidized loan eligibility, and graduate students are eligible for Direct Unsubsidized Loans within established annual loan limits; interest on unsubsidized loans accrues while the student is enrolled. Aggregate loan limits for both types of loans are established for undergraduate and graduate students.

**Education loans:** Loans issued to students and their families specifically for the purpose of helping families to cover the cost of college attendance. They include loans provided under various federal programs and loans provided by private lenders.

**Financial terms:** Loan features that influence the cost of the loan to the borrower. These include the interest rate, fees that are charged or waived, discounts that are available to all borrowers, and discounts that must be “earned” by borrowers (e.g., discounts that are contingent upon borrower behavior, such as enrolling in an automated payment plan or making a series of on-time payments). These terms are set by the lender for private student loans and by federal regulation for Direct Loans.

**Gift:** Generally, any payment for which the recipient does not provide equal or greater consideration in return, consistent with the meaning of “gift” under the California Political Reform Act. (A complete definition of this term with specific examples is found in the University of California Policy and Guidelines Regarding Acceptance of Gifts and Gratuities by Employees under California’s Political Reform Act.) The University of California Code of Conduct Regarding Preferred Lender Arrangements section of this Education Loan Policy includes the definition of ‘gift’ provided in federal regulations that applies to preferred lender arrangements.

**Health and Human Services (HHS):** The U.S. Department of Health and Human Services provides campus-based Loans for Disadvantaged Students (LDS), the Health Professions Student Loans (HPSL), the Primary Care Loans (PCL), the Nursing Student Loans (NSL) and the Nurse Faculty Loan Program (NFLP).

**Lender:** An entity that provides education loans to University of California students.

**Loan service provider (loan servicer or servicer):** An agency under contract to or employed by a lender to service (disburse and/or collect) a student loan account. The loan servicer may serve as the primary point of contact for borrowers when there are questions about repayment. Servicers also approve deferments and forbearances for borrowers on the lenders’ behalf. There are servicers that service only federal student and parent loans, servicers that service only private education loans, and servicers that service both federal and private education loans.

**Preferred lender list:** The list of loans UC has evaluated, and made available to students to assist them in selecting a private student loan. Students are not precluded from borrowing from lenders that do not appear on UC’s preferred lender list.

**Private student loan:** An education loan offered by a non-federal lender (e.g., a private lender, an institution, or a state agency). These loans are not guaranteed by the federal government and may carry higher rates than federal loans. They do not provide the federal benefits offered to federal student loan borrowers such as the federal government’s income-based repayment options and the Public Service Loan Forgiveness Program.

**University Loans:** A campus-based education loan funded by the University to provide need-based private student loans to UC students. For purposes of this policy, University Loans do not include short-term and emergency loans, provided that the term of the loan is ninety days or less or no interest is charged, and the loan is repaid in one year or less.

**William D. Ford Federal Direct Loan Program (Direct Loans):** A federal program that provides Direct Subsidized Loans, Direct Unsubsidized Loans, and Direct PLUS Loans that are funded by the federal government. Loans are administered by the federal government and funds are provided by the government directly to students and their parents through their schools.

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### III. POLICY TEXT

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In 1994, The Regents established a financial aid policy based on the principle that financial considerations should not be an insurmountable obstacle to student decisions to seek and complete a University degree.

Education loans are an essential source of financial support for many University of California students. The availability of education loans and the financial terms of these loans have a direct impact on the affordability of the University as a whole.

The University’s policy related to these loans is guided by two principles:

- The University’s practices related to education loans must meet the highest standards of integrity, transparency, and service to students.
- The University has a responsibility to help students and families identify and receive education loans that best meet their needs.

Consistent with these principles, University practices related to education loans will adhere to the requirements that are described in detail below. Unless otherwise noted, these requirements are effective as of the issuance date of this policy. These requirements are in addition to the requirements of the University of California Conflict

of Interest Code and all other requirements of University policy and federal and state law and regulation. (A partial listing of relevant University policies is included in Section VI.)

The Office of the Vice President for Student Affairs is responsible for communicating this policy and will periodically review and update the policy, with campus consultation.

All references in this policy to “the University” or to “University employees” apply to the University as a whole, to individual campuses and departments, and to officially recognized alumni associations. Unless otherwise noted and where applicable, references to “lenders” also include lenders’ loan service providers.

The requirements are grouped into three general areas:

- Practices related to University Loans
- Practices related to helping students identify and receive non-federal loans
- University code of conduct regarding preferred lender arrangements

#### **A. Campus utilization of University Loans**

University Loans are considered private student loans. The University must follow all the provisions of the Truth-in-Lending Act (TILA) in the awarding and administration of these loans. The supplement and revisions to Regulation Z (12 CFR 226) of the Federal Reserve Board are the official interpretation of TILA.

For purposes of this policy, short-term and emergency loans are not considered to be University Loans as long as the term of the loan is ninety days or less or no interest is charged, and the loan is repaid in one year or less. Loans that meet these conditions are not subject to TILA regulations.

The provisions below apply to all practices related to University Loans.

1. The University must provide statements required by TILA to potential borrowers in time for the potential borrowers to decline their loans, consistent with the underlying intent that TILA statements inform borrowers before they make a commitment to accept their loans.
2. UCOP will provide a link to approved TILA templates. Campuses that wish to alter the content of UCOP-approved TILA documents must obtain prior approval for their proposed content changes from UCOP’s Student Financial Support Unit.
3. A University Loan program that is structured to be self-sustaining may set interest rates, repayment plans, fees, and other terms to appropriately reflect the risk of the underlying borrower population. Interest rates that exceed the

current Direct PLUS Loan rate must provide appropriate justification and obtain prior approval from UCOP's Student Financial Support Unit.

4. The terms and conditions under which a student is eligible to receive a University Loan must be non-discriminatory and applied consistently.
5. UCOP will provide a link to promissory note templates that meet current regulatory requirements. Campuses are expected to assure their promissory notes meet such requirements at all times. Campuses that wish to alter the content of UCOP-approved promissory note templates must obtain prior approval for their proposed content changes from UCOP's Student Financial Support Unit.
6. Entrance and exit loan guidance must be provided to all University Loan borrowers in a manner comparable to Perkins Loans. It is up to each campus to determine and document the manner in which this guidance is provided.

## **B. Helping students identify and receive loans**

Campuses may help students to identify the education loans that best meet their needs in a number of ways, including counseling of individual students, debt management workshops, and UC preferred lender lists presented to students using interactive web tools that allow students to identify and compare private loans with borrower-specific criteria.

Private student loans are sometimes necessary resources for students who seek a UC education. International students and students enrolled in most UC Extension Programs do not qualify for federal Direct Loans and may need to borrow private student loans. Students who do qualify for Direct Loans but who reach their annual and/or aggregate loan limits may look to private student loans to meet their needs. In a complex private student loan marketplace, a carefully constructed preferred lender list, compiled free of lender influence, can be a particularly valuable tool for students and families to identify the loans that best meets their needs.

Provisions related to the development and communication of preferred lender lists apply to lists established for the 2013-14 and subsequent academic years.

1. In order to help borrowers and their families identify the loans that best meet their needs, campuses must make the University's preferred lender lists available to their students.
2. Loan products will be selected for inclusion on a preferred lender list based solely on their ability to serve the best interests of borrowers. The selection mechanism must utilize a rating system that includes the following factors, objectively measured and documented, along with a weight for each factor in a loan's overall rating:

- The financial terms of the loan, at origination and in repayment
  - Loan features
  - The quality of lender service to borrowers over the lifetime of the loan, including origination and repayment (e.g. participation in loan certification and disbursement platforms utilized by the campuses).
3. At the University's discretion, the University may add loans to the preferred lender list if those loans are available to a segment of the student population that the top-rated loan programs do not serve, such as a loan for students with poor credit histories. These loans may be included, even if those loan costs are greater than other loans on the list. Such loans, if added, may also be referred to as UC Preferred Private Loans. Those selected will represent what the University considers the most competitive rates for the students who might not otherwise qualify for a private loan. Students will be alerted that these loans are not appropriate for students who are better served by the top-rated loans on the list.
  4. Any preferred lender list presented to students must include, at a minimum, the following elements presented in an easily understandable format:
    - a statement telling the student that federal student loans are available to most students regardless of income and provide a range of repayment options, including income-based repayment plans and loan forgiveness benefits, which other education loans are not required to provide
    - the terms, benefits, and other relevant features of loans on the list presented in a standardized format that facilitates comparisons
    - the factors used to select loans for inclusion on the list
    - clear notification that students and families are free to select lenders or loans that do not appear on the list
    - an assurance that the campus will process applications for lenders that do not appear on the list as expeditiously as possible.
  5. A campus's evaluation and selection of third-party software, information systems, networks (e.g., ELMNet or OpenNet) and platforms used to certify and disburse private student loans must be based upon the best interest of students.
  6. No campus may promote or appear to promote any lender or loan product that has not been selected for inclusion on a UC preferred lender list pursuant to the criteria described in (2), above.
  7. The Office of the President will assist campuses by working with them to develop a common system for rating available loan products in order to maintain current preferred lender lists. An individual campus may request approval to use a different rating system only if the system meets the requirements described in (2), above; the decision to use the alternative rating system is documented, explained, and approved in writing by the

- campus Chancellor; and the Chancellor's written approval is submitted to the Office of the President in advance of the issuance of any request for information, request for proposal, or solicitation for information from the private lender community.
8. The Office of the President will periodically conduct a Request for Information (RFI) or comparable process to collect information about available loan options and their respective terms and services to facilitate the rating process described in (7), above to maintain current preferred lender lists.
  9. To assist students in making informed decisions, the Office of the President will consult with campuses to present loan options to students in a consistent manner that allows students to compare the features of loan products and provide the information needed to make choices that are in the best interest of each student.
  10. The Office of the President, in collaboration with each Chancellor, is responsible for periodically reviewing systemwide and campus practices to ensure that they are consistent with this policy and are in compliance with all federal and state regulations that govern student loan practices, including required consumer disclosures.
  11. New private student loan products that are identified outside of the RFI process described above may be reviewed by the UC Office of the President, in consultation with others as deemed appropriate, to determine whether the addition of such a product to a preferred lender list is appropriate.

### **C. University code of conduct regarding preferred lender arrangements**

This section serves as the “Code of Conduct” portion of the University of California Policy on Education Loan Practices.

The code of conduct regarding preferred lender arrangements is designed to prohibit a conflict of interest for all UC employees and agents of the UC system who have responsibilities that include private student loans. All such employees must be annually informed of the provisions of the code of conduct. The requirements contained herein augment the requirements outlined in UC's Business and Finance Bulletin [G-39, Conflict of Interest Policy and Compendium of Specialized University Policies Guidelines, and Regulations related to Conflict of Interest](#) (see VI-B for link to policy).

All references to “UC” to “UC employees” and to “UC campuses” apply to the University as a whole, to individual campuses and departments, and to officially recognized alumni associations. All references to “lenders” apply to entities that provide education loans to UC students. Unless otherwise noted, references to “lenders” also include loan service providers.

### **Employee-Lender Relationships and Interactions**

University employees have historically interacted with lenders in a variety of contexts, including professional association meetings and industry conferences, service on lender advisory boards, and routine interactions related to student loan administration. The continuing value of such interactions is the exchange of information to inform University decision-makers about the range of products and services available to students, and to help lenders improve the products and services available to UC students.

No relationship between the University and a lender may compromise the University's ability to help students and their families identify and receive the loans that best meet their needs. University-lender relationships must conform to the highest standards of integrity, transparency, and service to students.

The University's mission is furthered through financial support from public and private entities, including corporations and business concerns. Examples include sponsored research initiatives, corporate-sponsored scholarships and symposia, and corporate programs that match charitable contributions made by the corporation's employees. The provisions below are designed to maintain a clear distinction between general corporate support for University activities and relationships related to private student loans.

1. The University will not accept any payment or other benefit from a lender in exchange for inclusion on a preferred lender list.
2. The University may accept and use collateral information materials provided by a lender that describe their products and services only if the loan products have been accepted for inclusion on a UC preferred private student loan list, in order to avoid the perception that the University is endorsing a lender or loan product that is not a UC preferred private student loan product. Such materials and their display or distribution on campus must conform to all relevant campus policies.

### **Alumni Associations**

Officially recognized University of California alumni associations support the University's mission in numerous ways and are subject to the same federal regulations as the University regarding private student loan preferred lender arrangements. For this reason, UC alumni associations may not promote preferred education loan options to UC students or develop their own preferred lender lists outside of the process described elsewhere in this policy.

Once a student has graduated or is no longer an enrolled UC student, preferred lender arrangement regulations no longer apply. UC alumni associations may work with lenders to provide refinancing and consolidation loan products to former University of California students and their families provided that University alumni associations:



- consult with the campus financial aid office about the terms of the lender's products and the quality of their service before entering into or substantially revising any agreement with a lender regarding the provisions of refinancing and consolidation loans;
- conform to all applicable federal and state laws and regulations regarding relationships between school-affiliated organizations and lenders;
- provide potential borrowers with a description of any benefit provided by the lender to the University (including the alumni association) in exchange for the opportunity to market the lender's loan to the borrower; and
- notify the potential borrower that other lenders may offer either better or less-favorable terms, and that neither the University nor the alumni association makes any claim regarding the terms of the lender's loans.

### **Conflict of Interest**

All employees are subject to the University of California Conflict of Interest Code and the Ethics in Government Act. While these codes do not restrict University employees from giving advice to or receiving information from outside entities, they do prohibit University employees from participating in certain decisions affecting an outside entity. The prohibition applies if the University employee has received a gift – including, in general, reimbursement for meals and travel expenses – from that entity in excess of a specified amount. In addition, individuals who are defined under California law as “designated officials” are entirely prohibited from receiving gifts above a specified amount.

Employees are also subject to the University of California Policy and Guidelines Regarding Acceptance of Gifts and Gratuities, which stipulates that “In addition to the requirements of law, University officers and officials must avoid the appearance of favoritism in all of their dealings on behalf of the University. All University officers and employees are expected to act with integrity and good judgment and to recognize that the acceptance of personal gifts from those doing business or seeking to do business with the University, even when lawful, may give rise to legitimate concerns about favoritism depending on the circumstances.”

To avoid any conflict of interest, the following conduct is prohibited:

1. UC campuses must not enter into any *revenue-sharing arrangement* with any lender. For purposes of this statement, the term *revenue-sharing arrangement* means an arrangement between UC and a lender under which a lender provides a private student loan to students attending a UC campus, UC recommends the lender or their loan products and, in exchange, the lender pays a fee or provides other material benefit, including revenue or profit sharing, to the institution.

2. UC employees and agents of the UC system who are employed in the financial aid office, or otherwise have responsibilities that include private student loans, must not solicit or accept any gift from a lender or servicer of federal or private student loans. The term gift may include any gratuity, favor, discount, entertainment, hospitality, loan, or other item having more than a nominal value. The term includes a gift of services, transportation, lodging, or meals, whether provided in kind, by purchase of a ticket, payment in advance, or reimbursement (except for reasonable expenses as specified in paragraph 11 in this code of conduct) after the expense has been incurred. The term *gift* does not include any of the following:
  - a. Standard material, activities, or programs on issues related to a loan, default aversion, default prevention, or financial literacy, such as a brochure, a workshop, or training.
  - b. Food, refreshments, training, or informational material furnished to a UC employee or agent of the UC system as an integral part of a training session that is designed to improve the products or services of a lender or servicer of loans, provided such training contributes to the professional development of the UC employee or agent of the UC system. Please note that any UC employee required to file the California Fair Political Practices Commission's (FPPC) Form 700 under the Political Reform Act (PRA) is prohibited from receiving gifts, including food, which exceed an annual limit. The annual limit is published in Form 700 each year and is reported in the Introduction in the Gift Prohibition section. For 2014, the limit is \$440 but the amount may be increased in subsequent years based on the CPI. The most recent Form 700 can be found on the FPPC website <http://www.fppc.ca.gov/index.php?id=500/>.
  - c. Favorable terms, conditions, and borrower benefits on a private student loan provided to a student employed by the institution if such terms, conditions, or benefits are comparable to those provided to all students of the institution.
  - d. Entrance and exit counseling services provided to borrowers to meet the institution's responsibilities provided that the institution's staff are in control of the counseling (whether in person or via electronic capabilities) and such counseling does not promote the products or services of any specific lender.
  - e. Philanthropic contributions to an institution from a lender or servicer that are unrelated to student loans. This includes any contribution to an institution from any lender or servicer that is not made in exchange for any advantage related to private student loans. For example, a UC campus may utilize third-party products that support private loan application, origination and disbursement processing (e.g. ELMNet,

OpenNet, ScholarNet and the National Disbursement Network). These products may be made available at no charge to UC or provided at below-market cost, provided that the evaluation and selection process serves the best interests of the borrowers, and no advantage is given to the third-party entity that provides the product(s).

3. A gift to an immediate family member of a UC employee or agent of the UC system may be also prohibited if:
  - a. The donor of the gift and the family member have no established working, social, or similar relationship that would make the gift appropriate to the family member, or
  - b. There is evidence to suggest that the donor of the gift had a purpose to influence the UC employee or agent. This could include that the donor is involved in an action or decision of the UC in which the UC employee or agent will participate, or could include a donor who has a contract with the UC or seeks a contract with the UC.
4. A UC employee or agent of the UC system who is employed in the financial aid office of the institution or who otherwise has responsibilities that include private student loans must not accept from any lender or affiliate of any lender any fee, payment, or other financial benefit (including the opportunity to purchase stock) as compensation for any type of consulting arrangement or other contract to provide services to a lender or on behalf of a lender relating to private education loans. This does not prohibit:
  - a. A UC employee or agent of the UC system who is not employed in the institution's financial aid office and who does not otherwise have responsibilities with respect to private student loans from performing paid or unpaid service on a board of directors of a lender or servicer of student loans.
  - b. A UC employee or agent of the UC system who is not employed in the institution's financial aid office, but who has responsibilities that include private student loans, from performing paid or unpaid service on a board of directors of a lender or servicer, provided that the individual recuse himself or herself from participating in any decision of said board regarding the provisioning or servicing of student loans at UC.
  - c. An officer, employee, or contractor of a lender or servicer of student loans from serving on any board of directors within the UC System or UC Alumni Associations, provided that the individual recuse himself or herself from any decision regarding the provisioning or servicing of student loans at UC.

5. A UC employee may not direct a borrower to a particular lender by assigning a first-time borrower, through award packaging or other methods, to a particular private lender or loan product.
6. No individual or UC campus may promote or appear to promote any private loan product or lender that has not been selected for inclusion on a UC private student loan list.
7. A UC campus may not refuse to certify or intentionally delay the certification of any loan based on the borrower's selection of a particular lender. However, student borrowers who select lenders that do not have an electronic interface with the campus might experience a longer processing time due to the manual nature of the process and such a delay would not be considered a code of conduct violation.
8. In order to provide loans to populations of students that are not being adequately served by UC's preferred loan lists, a campus may be permitted to enter into a risk-share or recourse contractual relationship with a private lender provided that the funds for those loans are **never** provided in exchange for concessions or promises to the lender of a specified number or volume of private student loans, or in exchange for being put on a preferred lender list. The terms *risk-share or recourse loans*, as used here, refers to arrangements between schools and lenders wherein the school acts as a partial guarantor to offset the risk of borrower default.

A campus that seeks to enter into a risk-share or recourse relationship with a lender must make a request to the UCOP Director, Student Financial Support, and provide evidence that student enrollment or financial access is being negatively impacted by the inability of prospective or continuing students to secure private student loans.

Once approval is granted, UCOP will work with the campus to conduct a Request for Information or a Proposal process that reflects the requirements of the desired loan program and complies with all relevant policies.

9. The institution must not request or accept from any lender any assistance with call center staffing or financial aid office staffing. However, it is permissible to request or accept assistance from a lender for:
  - a. Professional development training for financial aid administrators.
  - b. Educational counseling materials, financial literacy materials, or debt management materials to borrowers, provided that such materials disclose to borrowers the identification of any lender that assisted in preparing or providing such materials.

- c. Staffing services on a short-term, nonrecurring basis to assist the institution with financial aid-related functions during emergencies, including State-declared or Federally-declared natural disasters, and other localized disasters and emergencies identified by the Secretary.
10. A UC employee or employee of a UC-affiliated institution who has job responsibilities that directly or indirectly involve the development of UC private student loan lists, or who communicates with students about their education loan options, must not fail to disclose any potential financial interest in a lender and report the offer of a gift from a lender to his or her supervisor or other appropriate University official. The appropriate official will make a determination as to whether the individual has a potential or perceived conflict based on the financial interest or gift and will determine the proper course of action. No conflict of interest concerns attach to gifts of nominal value such as pens, key chains, and other inexpensive novelties. No gifts of more than a nominal value can be accepted.
11. Any UC financial aid office employee or any UC employee who otherwise has responsibilities with respect to private student loans or other forms of student financial aid and who serves on an advisory board, commission, or group established by a lender or group of lenders, must not receive anything of value from the lender or group of lenders except that the employee may be reimbursed for reasonable expenses incurred in serving on such an advisory board, commission or group. The term *reasonable expenses*, as used here, means that the expenses meet the standards of and are paid in accordance with applicable Federal cost principles for reimbursement as stated in section 200.474 of The Federal Register's Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance) as ruled by the Management and Budget Office (OMB) on December 26, 2013. Because UC's Travel Regulations Policy BFB-G-28 (<http://policy.ucop.edu/doc/3420365>) meets the Federal cost principles as outlined in OMB's Uniform Guidance, it is appropriate to follow the UC policy. Reimbursements for reasonable expenses, as specified in this paragraph, are permissible and stand as an exception to the gift restrictions stated in paragraph number 2 of this code of conduct. The U.S. Department of Education (ED) is tasked with creating a form for institutions to use to report annually to ED all expense reimbursements received from lenders, and the reimbursements must not exceed those allowed in UC policy. Regulations require that reporting occur annually once ED issues the required forms and reporting instructions.

## **IV. COMPLIANCE / RESPONSIBILITIES**

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The Provost and Executive Vice President-Academic Affairs is the Responsible Officer for this policy.

The Office of the Vice President for Student Affairs is responsible for interpreting, clarifying, and communicating this policy and will periodically review and update the policy, with campus consultation.

Chancellors are responsible for implementation and enforcement of the policy.

## **V. PROCEDURES**

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Not Applicable

## **VI. RELATED INFORMATION**

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### **A. Regents of the University of California Policies**

- The University of California Financial Aid Policy  
<http://www.universityofcalifornia.edu/regents/policies/3201.html>
- Policy on Senior Management Group Outside Professional Activities  
<http://www.universityofcalifornia.edu/regents/policies/7707.pdf>

### **B. Presidential Policies and Statements**

- Statement of Ethical Values and Standards of Ethical Conduct  
<http://policy.ucop.edu/doc/1100172>
- Conflict of Interest Policy and Compendium of Specialized University Policies, Guidelines, and Regulations Related to Conflict of Interest  
<http://policy.ucop.edu/doc/1220367>

## **VII. FREQUENTLY ASKED QUESTIONS**

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Not Applicable

## **VIII. REVISION HISTORY**

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February 2020: Technical edit to update contact info

This policy was updated and modified effective 10/22/2014

This policy was reformatted into the standard University of California policy template effective June 1, 2012.

Issued September 26, 2007