

# Financial Aid Code of Conduct

The Higher Education Opportunity Act (HEOA) requires educational institutions to develop and comply with a code of conduct that prohibits conflicts of interest for financial aid personnel. Any Coastal Alabama Community College officer, employee, or agent who has responsibilities with respect to student educational loans must comply with this code of conduct. The following provisions were developed to bring Coastal Alabama Community College into compliance with the federal law.

1. Neither the College as an institution nor any individual officer, employee, or agent shall enter any revenue-sharing arrangements with any lender.
2. No officer or employee of the College who is employed in the Financial Aid Office or who otherwise has responsibilities with respect to education loans, or agent who has responsibilities with respect to education loans, or any of their family members, shall accept any gift from a lender, guarantor, or servicer of education loans. For purposes of this prohibition, the term "gift" means any gratuity, favor, discount, entertainment, hospitality, loan, or other item having a monetary value of more than a De Minimis amount.
3. An officer or employee of the College who is employed in the Financial Aid Office or who otherwise has responsibilities with respect to education loans, or an agent who has responsibilities with respect to education loans, shall 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 education loans.
4. The College shall not request or accept from any lender any offer of funds to be used for private education loans, including funds for an opportunity pool loan, to students in exchange for the institution providing concessions or promises regarding providing the lender with: **A.** a specified number of loans made, insured, or guaranteed under Title IV; **B.** a specified loan volume of such loans; or **C.** a preferred lender arrangement for such loans. No preferred lender list will be maintained at the college.
5. The College shall not request or accept from any lender any assistance with call center staffing or Financial Aid Office staffing. This does not prohibit the college from requesting or accepting professional development training for financial aid administrators, receiving educational counseling materials (as long as the materials identify the lender that assisted in preparing the materials), or staffing services on a short term, nonrecurring basis during emergencies or natural disasters.
6. Any employee who is employed in the Financial Aid Office, or who otherwise has responsibilities with respect to education loans or other student financial aid, and who serves on an advisory board, commission, or group established by a lender, guarantor, or group of lenders or guarantors, shall be prohibited from receiving anything of value from the lender, guarantor, or group of lenders or guarantors, except that the employee may be reimbursed for reasonable expenses incurred in serving on such advisory board, commission, or group. Financial aid professionals will disclose to their institution any involvement, interest in, or potential conflict of interest with any entity with which the institution has a business relationship.
7. No action will be taken by financial aid staff that is for their personal benefit or could be perceived to be a conflict of interest. Employees within the Financial Aid Office will not award aid to themselves or their immediate family members. Staff will reserve this task to an institutionally designated person, to avoid the appearance of a conflict of interest.
8. Information provided by the financial aid office is accurate, unbiased, and does not reflect preference arising from actual or potential personal gain.
9. Institutional award notifications and/or other institutionally provided materials shall include the following:
  1. A breakdown of individual components of the institution's Cost of Attendance, designating all potential billable charges.
  2. Clear identification of each award, indicating type of aid, i.e. gift aid (grant, scholarship), work, or loan.
  3. Standard terminology and definitions.
  4. Renewal requirements for each award.
10. All required consumer information is displayed in a prominent location on the institutional web site(s) and in any printed materials. It is easily identified, found, and labeled as "Consumer Information."