



HIGHLAND COMMUNITY COLLEGE

Financial Aid Department Code of Conduct

Highland Community College Financial Aid Department employees are expected to maintain the highest standards of conduct in all aspects of the administration of their duties, specifically including all duties conducted in dealing with any entity involved in any way with financial assistance. This pertains regardless of whether said entities are involved in a government sponsored, subsidized or regulated activity.

Any Highland Community College employee who is either directly involved with financial assistance or indirectly involved with financial assistance should:

- Never take any action for his or her personal gain or benefit.
- Never take any action that he or she believes is or might be contrary to law, regulation or the best interests of the students and parents we serve.
- In every circumstance ensure that the information given to students and parents is accurate and unbiased and does not reflect any preference arising from actual or potential personal or institutional gain.
- In every instance be objective in making decisions and advising the college regarding any institution involved in any aspect of student financial assistance.
- Never solicit or accept anything from an entity involved in the making, holding, consolidating or processing of any student loans, including anything of value, including reimbursement of expenses for serving on an advisory board or as part of a training activity of or sponsored by any such entity.
- Always disclose to the university any involvement with or interest in any entity involved in any aspect of financial aid.

Statement of Ethical Principals

Highland Community College adheres to the National Association of Student Financial Aid Administrators (NASFAA) Statement of Ethical Principles which is denoted below:

The Statement provides that financial aid professionals shall:

- Be committed to removing financial barriers for those who wish to pursue postsecondary learning.
- Make every effort to assist students with financial need.
- Be aware of the issues affecting students and advocate their interests at the institutional, state, and federal levels.
- Support efforts to encourage students, as early as the elementary grades, to aspire to and plan for education beyond high school.
- Educate students and families through quality consumer information.
- Respect the dignity and protect the privacy of students, and ensure the confidentiality of student records and personal circumstances.
- Ensure equity by applying all need analysis formulas consistently across the institution's full population of student financial aid applicants.
- Provide services that do not discriminate on the basis of race, gender, ethnicity, sexual orientation, religion, disability, age, or economic status.
- Recognize the need for professional development and continuing education opportunities.
- Promote the free expression of ideas and opinions, and foster respect for diverse viewpoints within the profession.
- Commit to the highest level of ethical behavior and refrain from conflict of interest or the perception thereof.
- Maintain the highest level of professionalism, reflecting a commitment to the goals of the National Association of Student Financial Aid Administrators.

Student Loan Code of Conduct

Prohibition against remuneration to Highland Community College

HCC will not solicit, accept or agree to accept anything of value from any Lending Institution, Guarantee Agency or Servicer in exchange for any advantage or consideration provided by the Lending Institution related to its student loan activity. This prohibition covers, but is not limited to:

- Revenue Sharing Agreements
- Any computer hardware for which HCC pays below market prices
- Any computer software used to manage loans unless the software can manage disbursements from all lenders
- Any printing costs, postage or services

This does not prevent HCC from soliciting, accepting or agreeing to favorable terms and conditions where the benefit is made directly to student borrowers.

Prohibition against remuneration to HCC employees

HCC will require and enforce that no trustee or employee of the college will accept anything more than a nominal value on his or her own behalf or on behalf of another during any 12 month period from, or on behalf of any Lending Institution, Guarantee Agency or Servicer.

This prohibition will include, but not be limited to a ban on any payment or reimbursement from any Lending Institution, Guarantee Agency or Servicer to college employees for lodging, meals or travel to conferences or training seminars.

This does not preclude any trustee or employee of the college from receiving compensation for conducting non-university business with a Lending Institution, Guarantee Agency or Servicer or from accepting compensation that is offered to the general public.

This prohibition does not prevent the college from holding membership in any non-profit professional associations.

Ban on gifts

No HCC employee or agent involved in the affairs of the College's financial aid office or who otherwise has responsibility with respect to education loans for students shall solicit or accept any gift from a lender, guarantor, or servicer of education loans.

"Gifts" are defined as but not limited to:

Any type of gratuity, favor, discount, entertainment, hospitality, loan, or other item having more than a token monetary 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 after the expense has been incurred.

The following items would not be considered to be “gifts”:

- 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.
- Food, refreshments, training, or informational material furnished to any officer, trustee, director or college employee, as an integral part of a training session that is designed to improve the service of a lender, guarantor, or servicer of education loans to the institution, if such training contributes to the professional development of the officer, trustee, director or employee.
- Favorable terms, conditions, and borrower benefits on an education 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.
- Entrance and exit counseling services provided to borrowers to meet the institution's responsibilities for entrance and exit counseling as required...”as long as”:
 - the institution's staff are in control of the counseling (and)
 - such counseling does not promote the products or services of any specific lender.
- Philanthropic contributions that are unrelated to education loans or any contribution not made in exchange for any advantage related to education loans.
- State education grants, scholarships, or financial aid funds administered by or on behalf of a State.

Ban on gifts to family members

Gifts to family members of any college officer, college employee, or any college agent involved in student loans or to any other individual based on that individual’s relationship with a college officer, employee or agent will be considered a gift to the officer, employee, or agent if:

- the gift is given with the knowledge and acquiescence of the officer, employee, or agent (and)
- the officer, employee, or agent has reason to believe the gift was given because of the official position of said officer, employee, or agent.

Limits of college employees participating on lender advisory boards

Any employee who is employed in the financial aid office of the College, or who otherwise has responsibilities with respect to education loans or other student financial aid through the College, and who serves on an advisory board, commission or group established by a lender, guarantor, or group of lenders or guarantors involved with student loans at the College is 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.

Contracting arrangements prohibited

Any employee is prohibited from accepting any payments of any kind from a lender in exchange for any type of consulting services related to educational loans.

- This does not prevent anyone else in the institution that has nothing to do with student loans from entering into these agreements.
- This does not prevent anybody from serving on a Board of Directors or trustee of an institution if the individual recuses him or her self from any decision regarding educational loans.

Revenue sharing agreements prohibited

HCC will not enter any revenue sharing agreement where:

- a lender provides or issues a loan that is made, insured, or guaranteed under this title to students attending the institution or to the families of such students; and
- the institution recommends the lender and in exchange the lender pays a fee or provides other material benefits

Prohibition on offers of funds for private loans

HCC will not request or accept any agreement or offer of funds for student education loans in exchange for concessions or promises of:

- a specified number of loans made, insured or guaranteed
- a specified loan volume
- a preferred lender arrangement

Ban on staffing assistance

HCC will not request or accept from any student loan lender any assistance with call center staffing or financial aid office staffing.

This does not include:

- Professional development training for financial aid administrators.
- 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.
- 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.

Interaction with borrowers

HCC participates in the Federal Family Education Loan Program (FFELP) and all student and parent borrowers are packaged under that program. In respect to alternative loans:

- HCC will not, for any first-time borrower, assign, through award packaging or other methods, the borrower's loan to a particular lender.
- HCC will not refuse to certify, or delay certification of, any loan based on the borrower's selection of a particular lender or guaranty agency.

Commonly Used Lender Lists

- HCC currently maintains a commonly used lender list located on the HCC website.
- HCC will not deny or delay processing of a FFELP loan if a student requests a lender that is not on our list.
- The HCC lender list contains at least three unaffiliated lenders that are willing to make loans at our school.
- The HCC lender list does not include any lenders that have offered financial or other benefits to us in exchange for inclusion on the list.
- HCC will provide to students upon request comparative information on benefits offered by each of the lenders on the list.
- HCC updates its lender list and comparison information on an annual basis.