

## **Student Loan Code of Conduct**

### **Purpose**

The purpose of this Code of Conduct is to prevent conflicts of interest, real or perceived, in the award and administration of educational loans at Glen Oaks Community College. These guidelines establish standards of conduct and policies for all employees and others that administer or contribute to any process in the awarding and disbursing of financial aid funds. Effective immediately, Glen Oaks Community College will adhere to the following Code of Conduct and will annually inform all College agents or employees with responsibilities for student loan activities and decisions of the provisions of this code.

### **Revenue-sharing Prohibited**

The College shall not enter into any revenue-sharing arrangement with any lender.

The term “revenue-sharing arrangement” means an arrangement between the College and a lender under which:

- A lender provides or issues a loan that is made, insured, or guaranteed to students attending the College or to the families of such students; and
- The College recommends the lender or the loan products of the lender and in exchange, the lender pays a fee or provides other material benefits, including revenue or profit sharing, to the College, an agent or employee of the College.

### **Gifts Prohibited**

No employee of the College who is employed in the financial aid office of the College or who otherwise has responsibilities with respect to education loans, or agent who has responsibilities with respect to education loans, shall solicit or accept any gift from a lender, guarantor, or servicer of education loans.

The term “gift” means any gratuity, favor, discount, entertainment, hospitality, loan, or other item having a monetary value of more than a de minimus amount. 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 term “gift” shall not include any of the following:

- Standard materials, 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 an agent or employee of the College, 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 College, if such training contributes to the professional development of the agent or employee.

- Favorable terms, conditions, and borrower benefits on an education loan provided to a student employed by the College if such terms, conditions, or benefits are comparable to those provided to all students of the College.
- Entrance and exit counseling services provided to borrowers to meet the College's responsibilities for entrance and exit counseling as required by law, as long as the College'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.
- Philanthropic contributions to the College from a lender, servicer, or guarantor of education loans that are unrelated to education loans or any contribution from any lender, servicer, or guarantor that is 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 the State.

A gift to a family member of an agent or employee of the College, or to any other individual based on that individual's relationship with the agent or employee, shall be considered a gift to the agent or employee, if the gift is given with the knowledge and acquiescence of the agent or employee and the agent or employee, has reason to believe the gift was given because of the official position of the agent or employee.

#### **Compensation for Services Prohibited**

No employee of the College who makes financial aid decisions for the College or who is employed in, supervised or otherwise has responsibility or authority over the Financial Aid Office shall receive any reimbursement for consulting services and/or serving as a member or participant of an advisory board of a Lending Institution or any reimbursement of expenses for such service. Any officer or employee of the College who serves as a member or participant of a Lending Institution's board shall recuse himself or herself from any board discussions regarding the College's financial aid operations.

#### **Contracting Arrangements Prohibited**

No officer or employee who is employed in the Financial Aid Office who otherwise has responsibilities with respect to education loans, or an agent who has responsibilities with respect to educational 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 to provide services to a lender on behalf of a lender relating to educational loans.

### **Particular Assignment or Delay Prohibited**

The College shall not assign, through award packaging or any other method, a borrower's loan to any particular lender nor shall it refuse to certify or delay a loan based on a borrower's chosen lender or guarantor selection, including first-time borrowers.

### **Offers of Funds for Private Loans Prohibited**

The College shall not request or accept from any lender funds to be used for private education loans, including funds for an opportunity pool loan for the college, providing any concessions or promises regarding increases revenue or loans for any particular lender or its affiliate.

### **Staffing Assistance Prohibited**

The College shall not accept or request any assistance with call center staffing or Financial Aid Office staffing from any lender or its affiliate. This excludes professional development training, providing educational counseling materials, and staffing services for a short term emergency basis, including natural disasters.

### **Policy Violations**

Any employee of Glen Oaks Community College, or its affiliate, who violates this policy, may be subject to disciplinary actions up to or including dismissal from the college.

## Code of Conduct

I have read and understand the code of conduct to which I will be held responsible for its implementation as an employee at Glen Oaks Community College.

Jean Zimmerman

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Leanne Barnell

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Barb Murk

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Debbie Gomoluch

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