



TITLE: Financial Aid Code of Conduct Policy	ORIGINAL EFFECTIVE DATE: 04/01/2010
	REVISION DATE: 03/16/2015

(This policy rescinds any previous publication covering the same material.)

I. Policy:

This Conflict of Interest Policy applies to all College divisions and to all employees, officers, any agents of the College, including but not limited to College associations, such as the alumni, who have relationships and/or responsibilities to students who are eligible for and receive educational loans, including scholarships, grants, federal, state, institutional, and private loans.

This policy reflects Aultman College’s continuing commitment to conducting financial aid practices with integrity, free from conflicts of interest, in the interest of students and in compliance with applicable law (HEOA 2009 Title I, Part E; throughout Title IV; Title X).

II. Purpose:

To prevent conflict of interest between Aultman College of Nursing and Health Sciences’ lender relationships and their responsibilities to students, the College, and its organizations (e.g., alumni). This policy upholds the Higher Education Opportunity Act and the Student Loan Sunshine requirements as required by educational institutions receiving Title IV funds.

III. Definitions:

For purpose of this Conflict of Interest policy:

Lending institution means:

- (a) Any entity that itself or through an affiliate engages in the business of making loans to students, parents or others for purposes of financing higher education expenses or that securitizes such loans; or

- (a) Any entity, or association of entities, that guarantees or services education loans;
or
- (b) Any industry, trade or professional association that receives money from any entity described above in subsections (a) and (b).

Opportunity Loan Agreement – means an agreement whereby a lending institution agrees to make up loans to a specified aggregate amount to students with poor or no credit history in exchange for concessions or promises by a college that may prejudice other borrowers.

IV. **Procedure:**

A. Prohibition against Renumeration of Aultman College

Aultman College of Nursing and Health Sciences is prohibited from accepting or soliciting anything of value from any lender, guarantor, or servicer in exchange for any advantage or consideration provided by the lending institution related to its student loan activity. This prohibition includes, but is not limited to:

1. Revenue-sharing arrangements;
2. Any computer hardware for which the College pays below market prices;
3. Any computer software used to manage loans, unless the software can manage disbursements from all lenders;
4. Any printing costs, postage, services;

The College also may not accept or solicit staffing assistance from a lending institution, including but not limited to call center staffing or financial aid office staffing. The College shall ensure that it does not identify any employee or other agent of a lending institution to students or prospective students of the college or their parents as an employee or agent of the college.

B. Prohibition against Opportunity Loans

The College shall not arrange with a lending institution to provide any opportunity loans, if the provision of such opportunity loans prejudices any other borrower.

The College also may not accept or solicit any funds to be used for private educational loans or opportunity pool loans in exchange for providing a lending institution with a specified number of loans, loan volume, or preferred lender arrangements.

C. Prohibition on Actions that Limit a Borrower's Choice of Lending Institution

Aultman College shall not assign a first-time borrower to a particular lender, or refuse to certify, or delay certification, of any loan based on the borrower's selection of a lending institution.

D. Prohibition against Renumeration of Aultman College officers, employees, and agents

Aultman College employees, officers, and agents are prohibited from soliciting or accepting any gift, gratuity, favor, discount entertainment, hospitality, loan, or other item of more than de minimus value from a lender, guarantor, or servicer of educational loans.

The prohibition includes, but is not limited to, services, transportation, lodging, or meals, whether provided in kind, by purchase of a ticket, payment in advance or reimbursement after the expenses has been occurred.

This prohibition does not prevent Aultman College from holding membership in any non-profit professional organization.

The following items are not considered “gifts”:

1. Materials or programs on issues related to loans, default aversion, default prevention, or financial literacy.
2. Food, refreshments, training, or informational material furnished to any officer, employee, or agent as an integral part of a training program designed to improve the service of a lender, guarantor, or servicer of education loans to Aultman College.
3. Entrance and exit counseling services provided to borrowers, as long as:
 - a. The institution’s staff maintains control of the counseling; and
 - b. The products and services of any lender are not promoted.
4. Philanthropic contributions to Aultman College that are unrelated to education loans and are not made in exchange for any advantage related to educational loans.
5. State education grants, scholarships, or financial aid funds administered by or on behalf of a State.

E. Limits of College Officers, Employees and Agents Participating on Lender Advisory Boards

Aultman College employees, officers, and agents are prohibited from receiving any remuneration for serving as a member or participant on an advisory board of any lender, guarantor or servicer, or receiving any reimbursement of expenses from said participation.

This limitation does not preclude any officer, employee or agent from participating on a lender advisory board unrelated to student loans.

This limitation does not preclude Aultman College officers, employees and agents not directly or indirectly involved in the affairs of the College’s financial aid office from serving on the board of directors of a publicly traded or privately held company.

F. Prohibition on Consulting for Lending Institutions by Financial Aid Officers and Other Employees who have Student Lending Responsibilities

Individuals employed in a financial aid office and other employees or officers who otherwise have student lending responsibilities are prohibited from consulting or providing other contract services for a lending institution.

This prohibition does not prevent a financial aid officer from consulting for, or serving on an advisory board constituted by, the federal government consistent with the College's Policy on Conflict of Interest and federal law.

G. Prohibition on Stock Ownership in Lending Institutions by Financial Aid Officers

A person employed as a financial aid officer of Aultman College shall not own stock or hold any other financial interest in a lending institution, other than through ownership of shares in a publicly traded mutual fund or similar investment vehicle in which the person does not exercise any discretion regarding the investment of the assets of the investment vehicle.

V. Approvals:

VI. Location: [Please provide verbiage for the following required publications]

- **Catalog**
- **Website**
- **Administrative Handbook**
- **Faculty Handbook**
- **Student Handbook**

Source:

Related References:

Note: Financial Aid Information and processes are described in the College catalog, Student Handbook and on the College website: www.aultmancollege.edu.