

## Kilian Community College Financial Aid Code of Conduct

The Higher Education Opportunity Act (HEOA) of 2008 requires, as a condition for educational institutions to participate in Title IV (Federal Financial Aid) programs, to develop and comply with a code of conduct which prohibits conflicts for its financial aid personnel. Kilian Community College's officers, employees and its agents are required to comply with this code of conduct. The following specific provisions bring KCC into compliance with the federal law.

- Neither Kilian Community College as an institution, nor any individual officer, employee or agent shall enter into any revenue-sharing arrangement with any lender.
- No officer or employee of Kilian Community 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, or, under certain conditions, any of their family members:
  - o shall solicit or 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 nominal amount.
    - The following are not considered gifts:
      - Standard material, activities or programs on issues relating to a loan, default aversion, or financial literacy, such as a brochure, workshop or training;
      - Food, refreshments, training, or informational material provided as part of a training session that is designed to improve the service of a lender, guarantor, or servicer if the training contributes to the professional development of KCC's officer, employee or agent;
      - Favorable terms and benefits on an education loan provided to a student employed by KCC if those terms and benefits are comparable to those provided to all students at KCC;
      - Entrance and exit counseling services provided to borrowers as long as KCC's staff is in control of the counseling and the counseling does not promote the services of a specific lender;
      - Philanthropic contributions to KCC from a lender, guarantor, or servicer of education loans that are unrelated to education loans or any contribution that is not made in exchange for any advantage related to education loans; and
      - State education grants, scholarship, or financial aid funds administered by or on behalf of a State.
  - o 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.
  - o 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 an advisory board, commission or group.

- For first-time borrowers, KCC will not assign, through the award packaging or other methods, the borrower's loan to a particular lender.
- KCC will not refuse to certify, or delay, the certification of any loan based on the borrower's selection of a particular lender or guaranty agency.
- KCC will not request or accept from any lender any offer of funds for private loans, including funds for an opportunity pool loan, to students in exchange for providing concessions or promises to the lender for a specific number of Title IV loans made, insured, or guaranteed, a specific loan volume, or a preferred lender arrangement.
- KCC may not request or accept from any lender any assistance with call center staffing or financial aid staffing. However, in emergency situations, lenders are permitted to provide staffing services on a short-term, nonrecurring basis to assist with financial aid related functions. Lenders are also permitted to provide educational counseling, financial literacy or debt management materials to borrowers as long as such materials disclose to borrowers the name of the lender that provided or assisted in the preparation of the materials.
- KCC financial aid staff can participate in meals, refreshments and receptions that are in conjunction with meetings, trainings, or conference events that are open to all attendees.
- Office visits by lenders/guarantors are normally limited to once per quarter.

Staff who knowingly fail to follow these guidelines will be subject to disciplinary action.

Kilian Community College is an active member of NASFAA (National Association of Financial Aid Administrators) and adheres to its [Statement of Ethical Principles and Code of Conduct for Institutional Financial Aid Professionals](#).