

**The financial aid office at Holyoke Community College has adopted the following Code of Conduct to ensure integrity in all aspects of the student educational loan programs.**

## **HOLYOKE COMMUNITY COLLEGE FINANCIAL AID OFFICE**

### **CODE OF CONDUCT – STUDENT LOAN PROGRAMS**

#### **Code of Conduct**

The primary goal of Holyoke Community College's financial aid staff is to help students achieve their educational potential by providing appropriate financial resources. To this end, the staff members employed in the Holyoke Community College financial aid office commit to a set of principles that serves as a common foundation for an acceptable standard of conduct.

Holyoke Community College's financial aid office staff shall:

- Maintain the highest level of professionalism
- Commit to the highest level of ethical behavior and refrain from conflicts of interest whether actual, potential, or perceived
- Respect the dignity and protect the privacy of students and ensure the confidentiality of student records and personal circumstances
- Provide information about lenders that have proven to offer the best combination of price, access to funds, and service to our students and families

Further, Holyoke Community College's financial aid office staff adhere to the following:

- Refrain from accepting gifts, meals, travel or anything of other than nominal value, from student loan providers in connection with the College's student loan programs
- Refrain from accepting, from a lending institution, money, equipment or printing services or anything of value that may suggest an advantage or preferred status
- If serving as a member of an advisory board, commission or group established by a lender, refrain from accepting anything of value in exchange for this service
- If publishing a preferred lender list, annually review lender choices and clearly and fully disclose the criteria and process for selecting preferred lenders
- If publishing a preferred lender list, disclose information regarding any lender on the preferred list that has an agreement to sell loans to another lender
- Make clear to students and their families that they have the right to borrow through any lender of their choice regardless of a preferred lender list
- Refrain from linking or otherwise directing students and families to any electronic loan process, such as a master promissory note or other loan agreement, that promotes or suggests preferred status for any lending institution
- Refrain from revenue sharing arrangements with any lender. This is defined as any arrangement between a school and a lender that results in the lender paying a fee or other benefits, including a share of the profits, to any member of the financial aid office staff as a result of the school recommending the lender to its students or families of those students.

- Refrain from steering borrowers to particular lenders or delaying loan certification based on the borrower's selection of a particular lender
- Refrain from requesting or accepting any offer of funds for private loans to students in exchange for providing concessions or promises to the lender for a specified number of loans or loan volume or preferred lender arrangement
- Refrain from accepting any fee, payment or financial benefit as compensation for any type of consulting arrangement or contract to provide services to or on behalf of a lender relating to education loans
- Refrain from receiving financial aid staffing assistance from a lender unless the staffing services are provided on a short-term nonrecurring basis during an emergency situation or for office staff professional development or for providing educational counseling, financial literacy or debt management materials to borrowers

### **Reporting of Policy Violations**

Any employee who believes that any provision of this policy has been violated shall report such violation to the Chair of the College's Board of Trustees, who shall then be responsible for immediately notifying the Chair and Chancellor of the Board of Higher Education. Upon review of the matter, the Board of Higher Education shall refer the violation to the Office of the Attorney General, if deemed appropriate.