

CODE OF CONDUCT

As active institutional members of the National Association of Student Financial Aid Professionals (NASFAA), the Financial Aid employees at Eastern West Virginia Community and Technical College have historically subscribed to the NASFAA Code of Conduct. The Code is intended to help guide financial aid professionals in carrying out their obligations, particularly with regard to ensuring transparency in the administration of the student financial aid programs, and to avoid the harm that may arise from actual, potential, or perceived conflict of interest.

Recently the Higher Education Opportunity Act of 2008 legislated requirements which prohibits a conflict of interest with the responsibilities of an officer, employee, or agent of the school regarding Title IV loans. **This Code does not replace the provisions outlined in the College's Conflict of Interest Policy, applicable to all employees**, but rather expands on this policy as it specifically relates to Title IV loans and any Eastern employees associated with these loans.

The term "employees" refers to any of the school's officers, employees and agents who are employed in the financial aid office or who have responsibilities with respect to student loans or who have responsibilities with respect to student loans related to Title IV education loans or private loans for educational purposes.

The Code of Conduct establishes that:

- Employees shall not enter into any revenue-sharing arrangement with any lender where the lender provides or issues a Title IV loan to the student or student's family in exchange for the school recommending the lender or the lender's loan products in exchange for a fee or material benefit including profit or revenue sharing that benefits the school or a school's employee or agent.
- Employees shall not solicit or accept any gift in the form of a gratuity, favor, discount, entertainment, hospitality, loan, service, transportation, lodging, meals, reimbursement, or other item having a monetary value of more than a de minimis (nominal) amount from a lender, guarantor, or servicer. Certain items and services are exempt from the definition of "gift" as outlined in Addendum A.
- Employees must not accept any fee, payment, or other financial benefit (including the opportunity to purchase stock) from a lender as compensation for any type of consulting arrangement or other contract to provide services to a lender or on behalf of a lender. Exceptions may include service as outlined in Addendum B.
- The school shall not request or accept funds from any lender for private education loans including funds for an opportunity pool loan to its students in exchange for the school providing promises of a specified loan number or volume or a preferred lender arrangement for educational loans.
- Employees shall not assign, through award packaging or other methods, a first-time borrower's loan to a particular lender, or refuse or delay processing of a loan based on the borrower's selection of a lender or guarantor.
- Employees shall not accept or request any assistance with call center or financial aid office staffing from any lender except as allowed by law.
- Employees who serve 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, group of lenders or guarantors. However, the employee may be reimbursed for reasonable expenses incurred in serving on the advisory board, commission, or group.

Addendum A: Exceptions to the term “gift”.

- Materials, activities, or programs related to loan issues, default aversion, default prevention or financial literacy, such as a brochure, a workshop, or training.
- Food, refreshments, training, or informational material furnished to an officer or employee of the school or to an agent as a part of a training session designed to improve the service of a lender, guarantor, or servicer of education loans to the school if such training contributes to the professional development of the school’s staff.
- Favorable terms, conditions, and borrower benefits on an education loan provided to a student employed by the school if the same terms, conditions, or benefits are comparable to those provided to all students at the school.
- Entrance and exit counseling as long as the school’s staff is in control of the counseling (whether in person or via electronic capabilities) and the counseling does not promote the products or services of any specific lender.
- Philanthropic contributions to a school from a lender, servicer, or guarantor that are unrelated to education loans and not made in exchange for any advantage related to education loans.
- Education grants, scholarships or financial aid administered by or on behalf of a State.

Addendum B: Exceptions to “contracting arrangements”.

- Paid or unpaid service on a Board of Directors of a lender, guarantor, or servicer of education loans by an officer or employee of a school who is not employed in the financial aid office and who does not have responsibilities with respect to education loans or an agent who does not have responsibilities with respect to education loans.
- Paid or unpaid service on a Board of Directors of a lender, guarantor, or servicer of education loans by an officer or employee of a school who is not employed in the financial aid office but who does have responsibilities with respect to education loans as a result of a position held at the school or an agent who has responsibilities with respect to education loans if the school has a written conflict of interest policy that clearly sets forth the requirement that officers, employees, or agents must recuse themselves from participating in any decision of the Board with regard to education loans at the school.
- Service by an officer, employee, or contractor of a lender, guarantor, or servicer of education loans on a Board of Directors or as a trustee of a school if the school has a written conflict of interest policy that the Board member or trustee must recuse himself/herself from any decision with regard to education loans at the school