

Policy Title: CODE OF CONDUCT - PARTICIPATION IN TITLE IV PROGRAM

As required by the Higher Education Opportunity Act of 2008 (HEOA, Section 493) for institutions participating in a Title IV loan program, East Central Community College has established the following code of conduct which applies to the officers, employees and agents of the institution.

- East Central Community College will not participate in revenue-sharing arrangements with any lender. The HEOA defines “revenue-sharing arrangement” as any arrangement between an institution and a lender under which the lender makes Title IV loans to students attending the institution (or to the families of those students), the institution 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 institution or to its officers, employees or agents.
- No officer or employee of East Central Community College’s financial aid office (or an employee or agent who otherwise has responsibilities with respect to educational loans) will solicit or accept any gift from a lender, guarantor or servicer of education loans. A “gift” is defined as any gratuity, favor, discount, entertainment, hospitality, loan or other item having monetary value of more than a de minimus amount. However, a gift does not include (1) a brochure, workshop or training using standard materials relating to a loan, default aversion or financial literacy, such as a brochure, workshop or training; (2) food, training or informational material provided as part of a training session designed to improve the service of a lender, guarantor or servicer if the training contributes to the professional development of the institution’s officer, employee or agent; (3) favorable terms and benefits on an education loan provided to a student employed by the institution if those terms and benefits are comparable to those provided to all students at the institution; (4) entrance and exit counseling as long as the institution’s staff are in control of the counseling and the counseling does not promote the services of a specific lender; (5) philanthropic contributions from a lender, guarantor or servicer that are unrelated to education loans or any contribution that is not made in exchange for advantage related to education loans, and; (6) State education grants, scholarships or financial aid funds administered by or on behalf of a State.
- An officer or employee of East Central Community College’s financial aid office (or employee or agent who otherwise has responsibilities with respect to education loans) may not accept from a lender or an affiliate of any lender any fee, payment or other 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.
- No one at East Central Community College will steer borrowers to particular lenders or delay loan certifications. A first-time borrower will not have a loan assigned, through award packaging or other methods, to a particular lender. In addition, the institution 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.
- East Central Community College 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 specified loan volume; or a preferred lender arrangement. An “opportunity pool loan” is defined as a private education loan made by a lender to a student (or the student’s family) that involves a payment by the institution to the lender for extending credit to the student.