

## **Crowder College FINANCIAL AID OFFICE CODE OF CONDUCT**

### **(in compliance with The Higher Education Opportunity Act)**

1. Crowder College will not participate in any type of revenue-sharing arrangement with a lender. A “revenue-sharing arrangement” is defined as any arrangement between an institution and a lender under which the lender makes Title IV loans to students attending Crowder College (or to the families of these students). Crowder College will not recommend certain lenders or the loan products of the lender, whereas the lender pays a fee or provides other material benefits. These benefits could include revenue or profit-sharing to Crowder College or to its officers or employees.
2. Employees of the Crowder College Financial Aid Office are banned from accepting gifts from a lender, guaranty agency or loan servicer. Employees of the Crowder College Financial Aid Office may not solicit any gift from a lender, guaranty agency or loan servicer. A “gift” is defined as any gratuity, favor, discount, entertainment, hospitality, loan, or any other item having monetary value of more than a minimum amount. Aforementioned gifts do not include **(a)** a brochure, workshop, or training using standard materials relating to a loan, default aversion, or financial literacy, such as a brochure, workshop or training; **(b)** 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 Crowder College’s officer or employee; **(c)** favorable terms and benefits on an education loan provided to a student employed by Crowder College, if those terms and benefits are comparable to those provided to all students at Crowder College; **(d)** entrance and exit counseling as long as the Crowder College staff is in control of the counseling, and the counseling does not promote the services of a specific lender; **(e)** 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 **(f)** state education grants, scholarships, or financial aid funds administered by or on behalf of the state of Missouri.
3. No employee of the Crowder College Financial Aid Office may accept from a lender (or an affiliate of any lender) a fee, payment, or other financial benefit as compensation for any type of consulting arrangement. No employee of the Crowder College Financial Aid Office may contract to provide services to or on behalf of a lender relating to education loans.
4. Employees of the Crowder College Financial Aid Office are banned from steering borrowers to particular lenders or delaying loan certification. For any first-time borrower, Crowder College may not use the awarding packaging method to assign the borrower to a particular lender. In addition, Crowder College may not refuse to certify or delay the certification of any loan based on the borrower’s selection of a particular lender or guaranty agency.
5. Employees of the Crowder College Financial Aid Office may not request or accept from a 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. An “opportunity pool loan” is defined as a private education loan made by a lender to a student (or the student’s family) that would involve a payment by Crowder College to the lender for extending credit to the student.

6. The Crowder College Financial Aid Office may not request or accept from any lender any assistance with call center staffing or financial aid office staffing. The lender may provide professional development training, educational counseling materials (as long as the materials identify the lender that assisted in preparation), or staffing services on a short-term, nonrecurring basis during emergencies or disasters.
7. If an employee of the Crowder College Financial Aid Office chooses to serve on an advisory board, commission, or group established by a lender or guarantor, said employee is banned from receiving any type of compensation. An exception would be reimbursement for reasonable expenses incurred by the employee for serving on the board.