

**Coker University
Office of Financial Aid
Code of Conduct**

Coker University's Office of Financial Aid (OFA) upholds a high standard of professional conduct. The OFA follows the National Association of Student Financial Aid Administrators established code of conduct, ethical principles, and standards of professionalism.

Revenue Sharing Prohibition: OFA staff will not receive items of value from lending institutions in exchange for an advantage sought by the lending institution.

Gift Ban: OFA staff will not solicit or accept gifts from a lender, guarantor, or servicer. A "gift" is defined as any gratuity, favor, discount, entertainment, hospitality, loan or other item having a monetary value of more than a small amount.

Advisory Board Compensation Rules: OFA staff will not accept items of value for serving on an advisory board of lending institutions.

Opportunity Pools: OFA staff will not request or accept from lenders funds to be used for private education loans, in exchange for providing concessions or promises of a specified number or volume of Title IV loans, or a preferred lender arrangement for Title IV loans.

Contract Arrangement Prohibition: Coker University employees, officers and agents with educational loan responsibilities will not accept any fee, payment or other financial benefit (including an 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 relating to education loans.

Staffing Assistance Ban: Coker University will not request or accept assistance from lenders to staff a call center or the OFA.

Loan Certification: OFA staff will not refuse to certify or delay loan certification based on the borrower's selection of a particular lender or guarantor.

Assigning Lenders: OFA staff will not assign first-time borrowers to a particular borrower.

Preferred Lender Guidelines/Disclosures: The OFA doesn't provide a preferred loan lender list. The OFA uses a free service that lists multiple lenders, provides private loan counseling, and provides students and parents the option to make well informed decisions in selecting a private loan lender. The OFA will not require students to use a particular lender or in any way limit the choice of lenders. The OFA will not recommend lenders to students or parents. Loans, regardless of type or lender choice, will be processed through any lender a student or parent chooses.

Award Notifications and Materials: Offer documents comprise of the university's cost of attendance, a clear identification of each award, and the type of aid (i.e., scholarship, federal funding, loan, or work study). Materials and site pages include information on renewal requirements for each award.

FAFSA: OFA staff will not ask candidates, their schools, their counselors or others to list or rank order their college or university preferences on applications or other documents. The OFA staff will not allow admission, financial aid, or scholarship decisions to be influenced by a list or rank ordering of a candidate's other college choices. This includes, but is not limited to, lists obtained from financial aid applications, testing, agencies, or other sources.

National Association of Student Financial Aid Administrators “Code of Conduct”

1. No action will be taken by financial aid staff that is for their personal benefit or could be perceived to be a conflict of interest.
 - a. Employees within the financial aid office will not award aid to themselves or their immediate family members. Staff will reserve this task to an institutionally designated person, to avoid the appearance of a conflict of interest.
 - b. If a preferred lender list is provided, it will be compiled without prejudice and for the sole benefit of the students attending the institution. The information included about lenders and loan terms will be transparent, complete, and accurate. The complete process through which preferred lenders are selected will be fully and publicly disclosed. Borrowers will not be auto-assigned to any particular lender.
 - c. A borrower's choice of a lender will not be denied, impeded, or unnecessarily delayed by the institution, even if that lender is not included on the institution's preferred lender list.
 - d. No amount of cash, gift, or benefit in excess of a de minimis amount shall be accepted by a financial aid staff member from any financial aid applicant (or his/her family), or from any entity doing business with or seeking to do business with the institution (including service on advisory committees or boards beyond reimbursement for reasonable expenses directly associated with such service).
2. Information provided by the financial aid office is accurate, unbiased, and does not reflect preference arising from actual or potential personal gain.
3. Institutional award notifications and/or other institutionally provided materials shall include the following:
 - a. A breakdown of individual components of the institution's Cost of Attendance, designating all potential billable charges.
 - b. Clear identification of each award, indicating type of aid, i.e., gift aid (grant, scholarship), work, or loan.
 - c. Standard terminology and definitions, using NASFAA's [glossary of award letter terms](#).
 - d. Renewal requirements for each award.
4. All required consumer information is displayed in a prominent location on the institutional web site(s) and in any printed materials, easily identified and found, and labeled as "Consumer Information."
5. Financial aid professionals will disclose to their institution any involvement, interest in, or potential conflict of interest with any entity with which the institution has a business relationship.

National Association of Student Financial Aid Administrators “Statement of Ethical Principles”

Advocate for students

- Remain aware of issues affecting students and continually advocate for their interests at the institutional, state and federal levels.
- Support federal, state and institutional efforts to encourage students, as early as the elementary grades, to aspire to and plan for education beyond high school.

Manifest the highest level of integrity

- Commit to the highest level of ethical behavior and refrain from conflict of interest or the perception thereof.
- Deal with others honestly and fairly, abiding by our commitments and always acting in a manner that merits the trust and confidence others have placed in us.
- Protect the privacy of individual student financial records.
- Promote the free expression of ideas and opinions, and foster respect for diverse viewpoints within the profession.

Support student access and success

- Commit to removing financial barriers for those who want to pursue postsecondary learning and support each student admitted to our institution.
- Without charge, assist students in applying for financial aid funds.
- Provide services and apply principles that do not discriminate on the basis of race, gender, ethnicity, sexual orientation, religion, disability, age, or economic status.
- Understand the need for financial education and commit to educate students and families on how to responsibly manage expenses and debt.

Comply with federal and state laws

- Adhere to all applicable laws and regulations governing federal, state, and institutional financial aid programs.
- Actively participate in ongoing professional development and continuing education programs to ensure ample understanding of statutes, regulations, and best practices governing the financial aid programs.
- Encourage colleagues to participate in the financial aid professional associations available to them at the state, regional, or national level and offer assistance to other aid professionals as needed.

Strive for transparency and clarity

- Provide our students and parents with the information they need to make good decisions about attending and paying for college.
- Educate students and families through quality information that is consumer-tested when possible. This includes (but is not limited to) transparency and full disclosure on award notices.
- Ensure equity by applying all need-analysis formulas consistently across the institution's full population of student financial aid applicants.
- Inform institutions, students, and parents of any changes in financial aid programs that could affect their student aid eligibility.
- Strive to ensure that cost of attendance components is developed using resources that represent realistic expenses.

Protect the privacy of financial aid applicants

- Ensure that student and parent private information provided to the financial aid office by financial aid applicants is protected in accordance with all state and federal statutes and regulations, including FERPA and the Higher Education Act, Section 483(a)(3)(E) (20 U.S.C. 1090).
- Protect the information on the FAFSA from inappropriate use by ensuring that this information is only used for the application, award, and administration of aid awarded under Title IV of the Higher Education Act, state aid, or aid awarded by eligible institutions.

Office of Financial Aid Additional Codes of Conduct

1. Per the university's Office of Human Resources, employees are not to change their personal or familial information in the system (especially NAE) to include such items as name, address, phone number, dependents, emergency contact, etc. If an employee has such changes, then the employee must complete the Changing Your Personal Information Google Form located on the Office of Human Resources Google Site.
2. Per federal regulations [34 CFR 668.16(c)(2), FSA 15-16 Vol 4, p. 4-188] employees of the Office of Financial Aid are not to complete financial aid processing of any kind for their family members (parent, sibling, spouse, child, spouse's child, spouse's parent and sibling's, or child's spouse). The employee of the Office of Financial Aid will work with another financial aid staff person to process their family member's financial aid.