TITLE	Student Loan Practices and Code of Conduct	POLICY 6.108
LEGAL AUTHORITY	34 C.F.R. 682.200(b)(5)(1), 682.212, 682.401	PAGE 1 of 3

The District Board of Trustees of Gulf Coast State College recognizes that ensuring the integrity of the student financial aid process is critical to providing fair and affordable access to higher education in Florida. Therefore, the board hereby adopts the following guiding principles. These guidelines are designed to avoid any potential for a conflict of interest between the board, its students, or their parents in the student financial aid process. Accordingly, the college shall adhere to the following principles in the college's financial aid operations:

1. <u>College employees should receive no personal benefit.</u>

   No officer, trustee, or employee of the college shall accept anything of more than nominal value on his or her behalf or on behalf of another person or entity from any lending institution. For example, cash, stocks, gifts, entertainment, expense-paid trips, etc. should never be accepted from a lending institution. Likewise, an individual should never receive payment or reimbursement from a lending institution for lodging, meals, or travel to conferences or training seminars. However, an officer, trustee, or employee of the college may: (a) conduct non-college business with any lending institution and, subject to state law, receive value in connection with such non-college business, so long as such value is not intended to influence the officer, trustee, or employee in conducting college business; (b) conduct college business and, subject to state law, receive value on behalf of the college that is unrelated to the student loan activities of the lending institution; (c) attend conferences and meetings of tax-exempt organizations that are funded or sponsored by more than one entity and, subject to state law, receive materials, refreshments, and other things of like value provided at such professional conference and meeting; and, (d) hold membership in, serve on the board of, or participate in the activities of any tax-exempt organization and, subject to state law, receive travel reimbursements and other things of like value from the tax-exempt organization for such activities.

2. <u>College employees should not serve on Lender Advisory Boards for remuneration.</u>

   No officer, trustee, or employee of the college who makes financial aid decisions for the college or who is employed in, supervises, or otherwise has responsibility or authority over the college's financial aid office shall receive any remuneration for serving as a member or participant of a student loan advisory board of a lending institution or any reimbursement of expenses for such service. Any officer, trustee, or employee of the college who serves as a member or participant of a lending institution board shall recuse himself or herself from any board discussions regarding the college's financial aid operations.

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3. <u>The College should not provide any advantage to a lending institution.</u>

The college shall not accept anything of value from any lending institution in exchange for any advantage or consideration provided to the lending institution related to its student loan activities, including but not limited to revenue-sharing, printing costs, or below-cost computer hardware or software. Likewise, the college shall not allow any lending institution to:
   a. staff the college's financial aid office at any time; or
   b. communicate with the college's students or their parents in such a manner as to create the impression that the lending institution is an employee or agent of the college in connection with the college's student financial aid operations, including through the use of mascots, logos, etc.

Finally, the college shall not enter into any agreement with a lending institution to provide alternative (*i.e.*, non-federal or "opportunity") student loan programs if the provision of such alternative loan programs prejudices other students or parents.

4. <u>The College should make appropriate use of any Preferred Lender Lists.</u>

If the college decides to promulgate a list or lists of preferred or recommended lenders for student loans or similar ranking or designation ("Preferred Lender List"), the selection of lending institutions for inclusion on the Preferred Lender List shall be based on the best interests of the college's students and their parents without regard to the financial interests of the college. In addition, any Preferred Lender List shall clearly explain:

- Students and their parents are free to select the lending institution of their choice and will suffer no penalty imposed by the college from using a lending institution that is not a "preferred lender";
- Students and their parents are not required to use any of the "preferred lenders";
- Where to find information on other lending institutions for student loans;
- The college will promptly certify any loan from any lending institution selected by a borrower, in accordance with U.S. Department of Education regulations;
- The process the college utilized to select "preferred lenders", including but not limited to the criteria used and the relative importance of such criteria;
- Where to find information on the competitive interest rates, terms, and conditions of federal loans;

MANUAL OF POLICY

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- Where to find information on the interest rate, loan servicing or other benefits offered by "preferred lenders"; and,
- Where to find information on any agreements by "preferred lenders" to sell their loans to other lending institutions.

The college shall review any Preferred Lender List on an annual basis to determine that the information appearing on the list is accurate and that any website links are still viable.

Date Adopted/Amended: 7-25-08