Financial Aid Personnel Code of Conduct Policy

POLICY: Financial Aid Personnel Code of Conduct			
POLICY NUMBER:	720.01.01	**CUSTODIAN:**	Academic Dean
APV'D DATE:	8/11/2020		
EFFECTIVE DATE:	8/11/2020	**REVIEW DATE:**	August 2020
REFERENCES: The Higher Education Opportunity Act, 20 U.S.C. §§1001 et seq, National Association of Student Financial Aid Administrators (NASFAA)			

Part 1. Policy Background and Purpose

The Higher Education Opportunity Act, 20 U.S.C. §§1001 et seq. (HEOA) requires every institution participating in federal financial aid programs to adopt a code of conduct applicable to financial aid personnel. In addition, as members of the National Association of Student Financial Aid Administrators (NASFAA), White Earth Tribal and Community College (WETCC) financial aid personnel adhere to the NASFAA Statement of Ethical Principles and principles specific to the financial aid profession.

Consistent with the requirements of the HEOA and the NASFAA Statement, WETCC and its financial aid personnel are required to comply with this Financial Aid Code of Ethical Conduct. Financial aid personnel are also required to abide by other relevant policies. The underlying principles of ethical behavior in each of these policies are similar. The Code of Ethical Conduct for Financial Aid Personnel applies these common underlying principles of ethical behavior to the specific circumstances that may arrive in financial aid operations.

Part 2. Definitions

Financial Aid Personnel: Any officer, employee, or agent of White Earth Tribal and Community College who has any responsibility in the administration of any student loan and/or federal, state, Tribal or private financial aid.

Part 3. Responsibility

The Associate Dean of Student Services is responsible for supervision of the Financial Aid Coordinator.

Financial Aid Personnel – Responsible for adhering to the Financial Aid Code of Conduct and signing the Statement of Ethical Principles.

Part 4. Code of Conduct Principles

Code of Conduct Principles: WETCC financial aid personnel shall:

1. Advocate for students:

a. Remain aware of issues affecting students and continually advocate for their interests at the institutional, state and federal levels.
b. 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.

2. Manifest the highest level of integrity:
    a. Commit to the highest level of behavior and refrain from conflict of interest or the perception thereof.
    b. 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.
    c. Protect the privacy of individual student financial records.
    d. Promote the free expression of ideas and opinions, and foster respect for diverse viewpoints within the profession.
3. Support student access and success:
    a. Commit to removing financial barriers for those who want to pursue postsecondary learning and support each student admitted at our institution.
    b. Without charge, assist students in applying for financial aid funds.
    c. Provide services and apply principles that do not discriminate based on race, gender, ethnicity, sexual orientation, religion, disability, age, or economic status.
    d. Understand the need for financial education and commit to educate students and families on how to responsibly manage expenses and debt.
4. Comply with federal and state laws:
    a. Adhere to all applicable laws and regulations governing federal, state, and institutional financial aid programs.
    b. 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.
    c. 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.
5. Strive for transparency and clarity
    a. Provide our students and parents with the information they need to make good decisions about attending and paying for college.
    b. 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.
    c. Ensure equity by applying all need-analysis formulas consistently across the institution's full population of student financial aid applicants.
    d. Inform institutions, students, and parents of any changes in financial aid programs that could affect their student aid eligibility.
    e. Strive to ensure that cost of attendance components is developed using resources that represent realistic expenses.
6. Protect the privacy of financial aid applicants:

a. 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).
b. 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.

Part 5. Code of Conduct

Financial Aid personnel will ensure that:

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 (immediate supervisor), to avoid the appearance of a conflict of interest.
    b. 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 identifiable 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.