

## **John A. Logan College**

### **Financial Aid Office Code of Conduct**

#### **Purpose**

The purpose of this Code of Conduct is to ensure that the Financial Aid Office at **John A. Logan College (JALC)** administers all federal, state, and institutional aid programs with **integrity, transparency, and fairness.**

This policy establishes clear expectations for all Financial Aid staff and any College employees who have responsibilities related to student financial assistance.

The Financial Aid Office adheres to all requirements of the **Higher Education Act (HEA) Title IV, U.S. Department of Education regulations,** and the **National Association of Student Financial Aid Administrators (NASFAA) Statement of Ethical Principles.**

#### **1. Commitment to Ethical Administration**

The Financial Aid Office is committed to:

- Providing **accurate, timely, and unbiased** information to students and families.
- Administering financial aid programs in a manner that promotes **equal access to education.**
- Ensuring that no action or policy benefits any individual employee or external entity at the expense of students or the institution.
- Treating every student and family with **respect, fairness, and confidentiality.**

#### **2. Compliance with Federal and State Regulations**

The Financial Aid Office will:

- Administer all aid programs in accordance with **Title IV federal regulations,** the **Illinois Monetary Award Program (MAP),** and other applicable state and institutional policies.
- Maintain full **program integrity** by verifying student eligibility, enrollment, and academic progress.
- Cooperate with internal and external audits, program reviews, and compliance assessments.

#### **3. Integrity and Accuracy in Communication**

Staff members will:

- Provide clear and factual information regarding financial aid programs, policies, and procedures.
- Avoid any misrepresentation or omission that could mislead students or families.
- Ensure that all published materials, online resources, and counseling communications reflect current, accurate regulatory information.

#### **4. Conflicts of Interest**

The Financial Aid Office will maintain independence from any entity involved in student financial assistance.

Accordingly:

- No staff member shall take any action that results in personal or financial gain.
- Any potential conflict of interest—financial, familial, or personal—must be disclosed to the Director of Financial Aid.
- Decisions related to loan, grant, scholarship, or work-study programs shall be made **solely in the best interest of students.**

#### **5. Prohibition on Gifts and Benefits**

In compliance with federal law (§ 487(e) HEA):

- Staff shall **not solicit or accept gifts, payments, favors, or other benefits** from any lender, guarantor, or servicer of education loans.
- **“Gift”** includes any item, service, entertainment, hospitality, loan, or monetary value benefit offered because of an employee’s role in financial aid administration.
- Acceptable exceptions include:
  - Training materials, workshops, or food provided as part of legitimate professional development.
  - State or federally funded programs administered by public agencies.
  - Standard materials related to default prevention or financial literacy.

Gifts to an employee’s family member are considered gifts to the employee if given with their knowledge or because of their position.

#### **6. Relationships with Lenders and External Entities**

The Financial Aid Office will:

- Not enter into **revenue-sharing agreements** with any lender.
- Not request or accept **funds for private loans** in exchange for preferred lender status or loan volume.
- Not assign, recommend, or delay certification of loans based on a borrower's choice of lender or guaranty agency.
- Not request or accept staffing support from a lender or servicer, except in limited emergencies (e.g., federally declared disasters).
- Ensure that any employee serving on a lender advisory board does so without compensation or reimbursement from that entity.

## **7. Confidentiality and Data Security**

All Financial Aid Office employees must protect the privacy of student and family information in compliance with the **Family Educational Rights and Privacy Act (FERPA)**.

- Student data will be used only for authorized institutional and regulatory purposes.
- No personal financial information shall be shared outside the institution without proper consent or legal authorization.

## **8. Professional Competence and Development**

The Financial Aid Office supports continuous professional growth.

Staff are expected to:

- Stay current with evolving federal and state financial aid regulations.
- Participate in professional associations, workshops, and training programs.
- Promote financial literacy and responsible borrowing among students and families.

## **9. Student-Centered Service**

The Financial Aid Office will:

- Provide equitable service to all students regardless of race, ethnicity, gender, religion, sexual orientation, disability, age, or socioeconomic status.
- Counsel students and parents objectively about available aid options and borrowing responsibilities.
- Strive to eliminate financial barriers and support student success.

## **10. Accountability and Enforcement**

All Financial Aid Office employees must:

- Adhere to this Code of Conduct and report any suspected violation, conflict of interest, or fraudulent activity to the Director of Financial Aid or the College's compliance officer.
- Cooperate with all investigations, audits, and regulatory reviews.
- Understand that violations may result in disciplinary action, up to and including termination of employment, and possible referral to federal authorities.

## **11. NASFAA Statement of Ethical Principles**

John A. Logan College affirms the NASFAA Statement of Ethical Principles, which require financial aid professionals to:

- Eliminate financial barriers to higher education.
- Make every effort to assist students with financial need.
- Protect student confidentiality.
- Ensure equity and consistency in aid administration.
- Avoid conflicts of interest and the appearance of impropriety.
- Uphold professionalism and commitment to continuing education.