

## Financial Aid Code of Conduct

The Higher Education Opportunity Act (the "Act") requires all educational institutions that engage in the administration of educational loan programs to develop, publish, administer and enforce an appropriate code of conduct. Hutchinson Community College and Area Vocational School (the "College") makes and administers education loans and recognizes that the integrity of the student financial aid process is critical to providing fair and affordable access to higher education.

To avoid conflicts of interest between the College, its students, or their parents in administering the College's student financial aid programs and to comply with the Act, all College officers, administrators and employees who have responsibilities with respect to approving or administering educational loans are required to comply with the provisions of this Financial Aid Code of Conduct.

- The College shall not participate in any revenue-sharing arrangement with any lender.
- College officers, administrators and employees shall not solicit or accept any gratuity, favor, discount, entertainment, hospitality, loan, or other item having monetary value from a lender, guarantor or servicer of education loans. No officer, administrator or employee of the College who has responsibilities with respect to education loans may accept from a lender, or an affiliate of any lender, any fee, payment, or other financial benefit as compensation for any type of consulting arrangement or contract to provide services to or on behalf of a lender relating to education loans.
- The College shall not (a) for any first-time borrower, assign, through the award packaging or other methods, the borrower's loan to a particular lender or (b) refuse to certify or delay certification of any loan based on the borrower's selection of a particular lender or grantor.
- The College shall not request or accept from any lender any offers of funds to be used for private education loans (as such term is defined in the Truth in Lending Act) including funds for an opportunity pool loan, to students in exchange for providing concessions or promises to the lender for a specific

number of loans made, insured, or guaranteed, a specified loan volume, or a preferred lender arrangement.

- The College shall not request or accept from any lender any assistance with call center staffing or financial aid office staffing, A lender may, however, provide professional development training, educational counseling materials (as long as the materials identify the lender that assisted in preparing the materials), or staffing services on a short-term, non-recurring basis during emergencies or disasters; and
- College officers, administrators and employees who have any responsibilities with respect to education loans who serves on an advisory board, commission, or group established by one or more lenders or guarantors is prohibited from receiving anything of value from any such lender or guarantor, except for reimbursement for reasonable expenses incurred by the employee for serving on the board.
- The College and its officers, administrators and employees also shall comply with the Kansas Attorney General Student Loan Code of Conduct.

The College is a member of National Association of Student Financial Aid Administrators (the "NASFAA") and follows the standards established in NASFFA's Statement of Ethical Principals and Code of Conduct for Institutional Financial Aid Professionals ([https://www.nasfaa.org/Code\\_of\\_Conduct](https://www.nasfaa.org/Code_of_Conduct))