

# **Minnesota State University Moorhead Student Loan Code of Conduct**

## **INTRODUCTION**

Minnesota State University Moorhead values the integrity in the actions of employees. The position an employee holds within the University is evidence of the trust we have in them. Compliance with all applicable laws, regulations, and University policies, and performance of duties according to the highest standards of honesty and integrity, are expected of all.

This Student Loan Code of Conduct applies to: (1) all employees of the University who have any responsibility with respect to education loans; and (2) all employees of the University who are employed in the Office of Scholarship and Financial Aid. If provisions of this Code of Conduct are violated, an employee is subject to discipline, up to and including termination of employment. If provisions of this Code of Conduct are violated, an employee also subjects the University to possible sanctions or liability.

If any questions arise related to the Code of Conduct, please refer to the resources listed in the section below titled Seeking Assistance. If one suspects or detects any activity one believes to be in violation of the Code of Conduct, one is required to report it promptly and confidentially to the Director of Scholarship and Financial Aid. It is the University's policy to promptly investigate suspected violations of this Student Loan Code of Conduct.

## **Student Loan Code of Conduct Provisions**

### **I. CONFLICTS OF INTEREST**

A conflict of interest exists when an employee's personal interest has the potential to interfere with their judgment and the expectation that they will act in the best interest of the University or the students attending the University.

A covered employee must avoid conflicts of interest. Accordingly, employees must comply with the following rules regarding conflicts of interest:

1. Employees must avoid actual or perceived conflicts of interest between duties and responsibilities at the University and dealings with education lenders who play any role in student financial aid at the University.

2. Employees must not accept any fees, payments, or other financial benefits from any education lender except as otherwise specifically described in this Code of Conduct.
3. Employees may not serve as a paid or unpaid member of a Board of Directors of an education lender.
4. Employees may not serve as a paid or unpaid consultant or employee for an education lender.
5. Employees may not serve on an education lender's Advisory Board without advance approval from the President of the University.

## **II. Gifts and Business Courtesies**

1. Employees may not accept or solicit gifts from education lenders. Gift is broadly defined to include anything of more than a nominal value (more than \$10). If offered a gift by a lender, an employee should decline the offer of a gift and immediately notify the Director of Scholarship and Financial Aid of the offer. This prohibition extends to employees' family members and close friends if a gift is offered due to the employee's position with the University.
2. Employees may, however, accept food, refreshment, training or informational material provided as part of training by a lender, provided the training or informational material is designed to improve the service of a lender and provided the training contributes to an employee's professional development.
3. If invited by a lender to a meal, entertainment event or for drinks, the employee must pay for his or her own expenses. If appropriate under the University's expense reimbursement policy, one may request reimbursement from the University for those expenses.
4. A "gift" does not include standard materials, activities or programs on issues related to a loan product, default aversion, debt management or financial literacy, such as a brochure, a workshop or training, provided that students are informed of the name of any lender, guarantor or servicer that assisted in preparing or providing such materials, activities or programs. Printed materials must contain the name of the lender, guarantor or servicer that provided such materials and should not contain any University logos or trademarks.
5. The University may also use online entrance and exit counseling tools provided by lenders as long as:
  - a. The University is in control of such counseling session; and
  - b. The counseling does not promote the specific products or services of any specific lender.

### **III. Interactions With Student and Parent Borrowers**

1. Employees may not refuse to certify, or delay certification of, any loan eligibility based on the borrower's choice of lender, except as allowed by participation in the William D. Ford Federal Direct Loan program.
2. Employees must inform students that they have the right and ability to select a lender of their choice regardless of whether that lender appears on the University's List of Alternative Loan Programs.

### **IV. Offers of Private Loan Funds or Other Financial Products**

1. The University will not accept access to, or preferential rates on, private education loan from a lender in exchange for loan volume or placement on the University's List of Private Loan Programs.
2. A lender may provide non-lending services to the University; however, the University must pay for these services at market rates and employees may not promise or give the lender any advantage with respect to education loans in exchange for the non-lending services.
3. Nothing in paragraph IV.1, above, prohibits the University from accepting scholarships or philanthropic contributions from a lender that are unrelated to education loans. Employees must notify the Director of Scholarship and Financial Aid of any lender's offer of scholarships or philanthropic contributions and obtain approval before committing the University to accept such offers.
4. Nothing in paragraph IV.1, above, prohibits the University from accepting state education grants, scholarships, or financial aid funds administered by or on behalf of the State of Minnesota.

### **V. Revenue Sharing Prohibited**

The University will not accept any fees or other benefits from a lender in return for placing the lender on the List of Alternative Loan Programs or referring private education loan volume or loan applications to the lender.

### **VI. Staffing Assistance Prohibitions**

The University may not request or accept from any lender any staffing assistance or call center assistance for the financial aid office, whether or not such lender proposed to charge the University for such services.

### **Seeking Assistance**

If you have a question regarding any statement contained in this Code of Conduct or you are aware of any breach, please contact the Director of Scholarship and Financial Aid, or the Vice President of Student Affairs and Enrollment Management.