



FINANCIAL AID OFFICE
PO BOX 277~SCOTTVILLE, MI 49454-0277
PHONE 231-843-5518~FAX 231-845-3944
finaid@westshore.edu

Conflict of Interest Policy and Code of Conduct

Purpose

The purpose of this policy is to prohibit conflicts of interest in situations involving student financial aid and to establish standards of conduct for employees with responsibility for student financial aid.

Code of Conduct

West Shore Community College hereby adopts the following as its Code of Conduct related to student loan activities and will annually inform all College employees with responsibilities for student loan activities and decisions of the provisions of this code.

1. Revenue-sharing Arrangements: The College shall not enter into any revenue-sharing arrangement with any lender.

The term “revenue-sharing arrangement” means an arrangement between the College and a lender under which—

- A lender provides or issues a loan that is made, insured, or guaranteed to students attending the College or to the families of such students; and
- The College recommends the lender or the loan products of the lender and in exchange, the lender pays a fee or provides other material benefits, including revenue or profit sharing, to the College, an agent or employees of the College.

2. Gifts: No employee of the College who is employed in the Financial Aid Office of the College or who otherwise has responsibilities with respect to education loans, shall solicit or accept any gift from a lender, guarantor, or servicer of education loans.

The term “gift” means any gratuity, favor, discount, entertainment, hospitality, loan, or other item having a monetary value of more than a de minimus amount. The term includes a gift of services, transportation, lodging or meals, whether provided in kind, by purchase of a ticket, payment in advance, or reimbursement after the expense has been incurred.

The term “gift” shall not include any of the following:

- Standard material, activities, or programs on issues related to a loan, default aversion, default prevention, or financial literacy, such as a brochure, a workshop, or training.
- Food, refreshments, training, or informational material furnished to an agent or employee of the College, as an integral part of a training session that is designed to improve the service of a lender, guarantor, or servicer of education loans to the College, if such training contributes to the professional development of the employee.

- Favorable terms, conditions and borrower benefits on an education loan provided to a student employed by the College if such terms, conditions, or benefits are comparable to those provided to all students of the College.
- Entrance and exit counseling services provided to borrowers to meet the College's responsibilities for entrance and exit counseling as required by law, as long as the College's staff are in control of the counseling, (whether in person or via electronic capabilities), and such counseling does not promote the products or services of any specific lender.
- Philanthropic contributions to the College from a lender, servicer, or guarantor of education loans that are unrelated to education loans or any contribution from any lender, guarantor, or servicer that is not made in exchange for any advantage related to education loans.
- State education grants, scholarships, or financial aid funds administered by or on behalf of a State.

3. Contracting Arrangements: No employee who is employed in the Financial Aid Office of the College or who otherwise has responsibilities with respect to education loans shall accept from any lender or affiliate of any lender any fee, payment, or other financial benefit (including the opportunity to purchase stock) as compensation for any type of consulting arrangement or other contract to provide services to a lender or on behalf of a lender relating to education loans.

4. Advisory Board Compensation: No employee who serves on an advisory board, commission, or group established by a lender, guarantor, or groups of lenders or guarantors may receive anything of value from the lender, guarantor, or group of lenders or guarantors in return for that service.

5. Staffing: The College will not request or accept from any lender any assistance with call center staffing or Financial Aid Office staffing.

6. Lender of Choice: When participating in the Federal Direct Loan Program, the College will assign a first-time borrower's federal loan to the federal government as the lender. The College will not assign a student's private loan to a particular lender or refuse to certify or delay certification of any private loan, based upon the borrower's selection of lender.

Sanctions

An employee that violates this Code of Conduct shall be disciplined in a manner consistent with applicable College policies, procedures, or collective bargaining agreements.

Disciplinary action may include termination of employment at the college.