Jefferson College Student Loan 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.

Prohibition of Certain Remuneration to School Employees
Jefferson College requires and ensures that no officer, trustee, director, employee, or agent of the College accepts anything of more than nominal value from on his or her own behalf or on behalf of another from or on behalf of a lending institution for any school business related to student loans.

Limitations to Employees Participating on Lender Advisory Boards
Jefferson College prohibits any officer, trustee, director, employee, or agent of the College from receiving any remuneration for serving as a member or participant of an advisory board of a lending institution or receiving any reimbursement of expenses for serving on advisory boards that are related to higher education student loans.

Prohibition of Certain Remuneration to the College
Jefferson College may not accept on its own behalf anything of value from any lending institution in exchange for any advantage consideration provided to the lending institution related to education loan activity.

Preferred Lender Lists
Jefferson College has a list of recommended lenders that has been developed based on historical loan activity and positive customer service feedback from students. However, students and families have the right and ability to select the education loan provider of their choice with no penalty. The recommended lender list will be reviewed annually by the Jefferson College Student Financial Services Office, and feedback from students about lending institutions may be provided to Student Financial Services at finaid@jeffco.edu.

Prohibition of Lending Institutions from Staffing the Financial Aid Office
Jefferson College will not allow an employee or agent of a lending institution to be identified to students, prospective students, or parents as an agent of the College. No employee or agent of a lending institution will staff the Student Financial Services Office at any time.

Proper Execution of Promissory Notes
Jefferson College will not link or otherwise direct potential borrowers to any electronic master promissory notes or other loan agreements that do not allow students to enter the lender code or name for any lender offering the relevant loan.

Prohibition of Opportunity Loans
Jefferson College will not arrange with a lending institution to participate in any override pools, opportunity funds, or opportunity loans, it the participation in such program(s) disadvantages any other borrower.

Private Loans as a Last Resort
The College shall not certify student eligibility for a private educational loan without first informing the borrower that (a) federal financial assistance (including grants and loans under Title IV) may be available and (b) federal loans may provide more advantageous terms to the borrower than private loans.

**Implementation**

a. The College agrees to publish the Student Loan Code of Conduct prominently on its website within ten business days of its adoption.

b. The College shall require all of its employees with direct responsibilities relating to student loans to obtain training concerning the Student Loan Code of Conduct, applicable federal as well as state student loan laws and regulations and related school policies and procedures within 90 days of the hire date. The College shall adopt procedures to ensure these employees maintain current knowledge of the Code and applicable regulations.

**Interaction with Borrowers**

When participating in the Federal Family Education Loan Program (FFELP), the College will not assign a first-time borrower’s federal loan, through award packaging or other methods, to a particular lender. The College will not refuse to certify, or delay certification of, any federal loan based on the borrower’s selection or a particular lender or guaranty agency.

When participating in the Federal Direct Loan Program, the College may assign a first-time borrower’s federal loan to the Federal Government as the lender.

Under no circumstances will the College assign a student’s private student loan to a particular lender, or refuse to certify or delay certification of any private loan, based upon the borrower’s selection of lender or guaranty agency.

**Policy Violations**

Violations of this policy may result in disciplinary action, up to and including dismissal.