

STATEMENT OF ETHICAL PRINCIPLES 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. This policy applies to all employees who work in the Financial Aid Office and all other Northeastern Oklahoma A & M College employees who have responsibilities related to educational loans or other forms of student financial aid.

Definitions:

- **Conflict of Interest:** A conflict of interest exists when an employee's financial interests or other opportunities for personal benefit may compromise, or reasonably appear to compromise, the independence of judgment with which the employee performs his/her responsibilities at Northeastern Oklahoma A & M College.
- **Gift:** 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.

STATEMENT OF ETHICAL PRINCIPLES

Northeastern Oklahoma A & M College's statement of Ethical Principles provides that the primary goal of the institutional financial aid professional is to help students achieve their educational potential by providing appropriate financial resources. The financial aid professional shall:

- Be committed to removing financial barriers for those who wish to pursue postsecondary education.
- Make every effort to assist students with financial need.
- Be aware of the issues affecting students and advocate their interests at the institutional, state, and federal levels.
- Support efforts to encourage students, as early as the elementary grades, to aspire to and plan for education beyond high school.
- Educate students and families through quality consumer information.
- Respect the dignity and protect the privacy of students, and ensure the confidentiality of student records and personal circumstances.
- Ensure equity by applying all need analysis formulas consistently across the institution's full population of student financial aid applicants.

- Provide services that do not discriminate based on race, gender, ethnicity, sexual orientation, religion, disability, age or economic status.
- Recognize the need for professional development and continuing education opportunities.
- Promote the free expression of ideas and opinions, and foster respect for diverse viewpoints within the profession.
- Commit to the highest level of ethical behavior and refrain from conflict of interest or the perception thereof.
- Maintain the highest level of professionalism.

CODE OF CONDUCT

This code of conduct applies to the officers, employees, and agents of Northeastern Oklahoma A & M College with responsibilities with respect to education loans. These officers, employees, and agents are expected to always maintain exemplary standards of professional conduct in all aspects of carrying out his or her responsibilities, specifically including all dealings with any entities involved in any manner in student financial aid, regardless of whether such entities are involved in a government sponsored, subsidized, or regulated activity. The officers, employees, and agents of Northeastern Oklahoma A & M College with responsibilities with respect to education loans should:

- Refrain from taking any action for his or her personal benefit.
- Refrain from revenue-sharing arrangements with any lender.
- Refrain from accepting compensation for any type of consulting arrangement or contract to provide services to or on behalf of a lender relating to education loans or for service on an advisory board, commission, or group established by lenders or guarantors, except for reimbursement for reasonable expenses.
- Refrain from steering borrowers to particular lenders or delaying loan certifications.
- Refrain from accepting offers of funds for private loans to students in exchange for promises regarding FSA loans, a specified loan volume, or a preferred lender arrangement.
- Refrain from taking any action her or she believes is contrary to law, regulation, or the best interests of the students and parents her or she serves.
- Ensure that the information he or she provides is accurate, unbiased and does not reflect any preference arising from actual or potential personal gain.
- Be objective in making decisions and advising his or her institution regarding relationships with any entity involved in any aspect of student financial aid.
- Refrain from soliciting or accepting anything of other than nominal value from any entity (other than an institution of higher education or a governmental entity such as the U.S. Department of Education)

involved in the making, holding, consolidating or processing of any student loans, including anything of value (including reimbursement of expenses) for serving on an advisory body or as part of a training activity of or sponsored by any such entity.

- Disclose to Northeastern Oklahoma A & M College any involvement with or interest in any entity involved in any aspect of student financial aid.