

## Policy Manual



<b>Title:</b> Conflict of Interest—Financial Services	<b>Number:</b> 6Hx2-3.38
<b>Legal Authority:</b> Florida Statutes 112.313, 1006.64	<b>Page:</b> 1 of 3

### GENERAL STATEMENT

Broward College administers Federal Title IV Student Financial Aid programs, and in doing so, employees in the student financial aid office (or other employees or agents with responsibilities with respect to education loans) are prohibited from receiving gifts from a lender, guaranty agency or loan servicer. This code also prohibits financial aid office staff or other non-financial aid employees from accepting compensation for any type of consulting arrangement or contract to provide services to or on behalf of a lender or financial institution relating to education loans or other financial aid services; service on an advisory board, commission, or group established by lenders or guarantors, except for reimbursement for reasonable expenses

Broward College financial aid professionals 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 POLICY and THE STUDENT

The Federal government requires that Broward College make available Federal subsidized and unsubsidized Stafford Loans and student loans through the William D. Ford Federal Direct Student Loan Program. The College Provides Students with clear information regarding their choices of student loans for educational purposes.

### THE POLICY and THE FACULTY AND STAFF

College employees shall adhere to the following professional code of conduct principles while employed in a capacity to administer the College's student financial aid operations:

1. College employees should not receive personal benefits from lending institutions:

No officer, trustee or employee of the College shall accept anything of value on his or her behalf or on behalf of another person or entity from any lending or financial institution which advertises to or otherwise provides a service to the students of Broward College for products involving Student Financial Aid. For example, cash, stocks, gifts, entertainment, expense-paid trips, etc. should never be accepted by a Broward College employee as a result of their job duties or access to Broward College students, faculty or staff. Likewise, an individual should never receive payment or reimbursement from a lending or financial institution for lodging, meals or travel to conferences or training seminars unless expressly approved by the Vice President of Human Resources/Equity and/or his/her designee. However, an officer, trustee or employee of the College may: (a) conduct non-College business with any lending institution and, subject to state law, receive value in connection with such non-College business, so long as such value is not intended to influence the officer, trustee or employee in conducting College business; (b) and/or subject to state law, receive value on behalf of the College that is unrelated

History: Adopted as policy May 1, 2008; Revised August 23, 2011.

<b>Approved by the</b> Board of Trustees	<b>Date:</b> 8/23/11	<b>President's Signature</b> 	<b>Date:</b> 8/23/11
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to the student loan activities of the lending institution; (c) attend conferences and meetings of tax-exempt organizations that are funded or sponsored by more than one entity, and subject to state law, receive materials, refreshments, and other things of like value provided at such professional conferences and meetings; and (d) hold membership in, serve on the board of or participate in the activities of any tax-exempt organization and, subject to state law, receive travel reimbursements and other things of value from the tax-exempt organization for such activities.

2. College employees should not serve on lender or financial institution advisory boards for remuneration: No officer, trustee or employee of the College who makes financial aid decisions for the College or who is employee in, supervises or otherwise has responsibility or authority over the College’s financial aid office shall receive any remuneration for serving as a member or participant of an student loan advisory board, commission or group established by a lending or financial institution or any reimbursement of expenses for such services. Any officer, trustee or employee of the College who serves as a member or participant of a lending or financial institution board shall recuse himself or herself from any board discussions regarding the College’s financial aid operations.
  
3. The College should not provide any advantage to a lending or financial institution:
 

The College shall not accept anything of value from any lending institution in exchange for any advantage or consideration provided to the lending institution related to its student loan activities, including, but not limited to revenue-sharing, printing costs or below-cost computer hardware or software. The College may accept any assistance that is authorized by 34 C.F.R 682.200(b)(5)(i)(definition of Lender). Likewise, the College shall not allow any lending or financial institution to:

  - (a) staff the College’s financial aid office at any time; or
  - (b) communicate with the College’s students or their parents in such a manner as to create the impression that the lending or financial institution is an employee or agent of the College in connection with the College’s student financial aid operations, including through the use of mascots, logos, etc.

Finally, the College shall not enter into any agreement with a lending or financial institution to provide alternative (i.e. non-federal “opportunity”) student loan programs if the provision of such alternative loan programs prejudices other students or parents.

4. The College shall not use any Preferred Lender Lists for alternative or private loans. Students and their parents are free to select lending institutions of their choice and will suffer no penalty imposed by the College by using a lending institution for private or alternative loans. The College will promptly certify any loan application from any lending institution if the student meets all other eligibility requirements, and has exhausted eligibility for lower cost federal loans.:

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### IMPLEMENTATION AND OVERSIGHT

The President has the authority to establish procedures to implement this policy. The Vice President for Student Affairs has responsibility for the implementation and oversight of this policy. Policy violations and appeals would be investigated by the Vice President for Human Resources and Equity and/or his/her designee.

### VIOLATION OF POLICY

Violations of this policy may result in discipline up to and including termination.

### DEFINITIONS

Lending or Financial Institution – any entity (other than an institution of higher education or a governmental entity such as the U.S or Florida Department of Education) involved in the making, holding, consolidating or processing of any student loans or performing other services related to financial aid processing, refunds, or disbursements.

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<b>Approved by the</b> Board of Trustees	<b>Date:</b> 8/23/11	<b>President's Signature</b> <i>J. David Anthony J.</i>	<b>Date:</b> 8/23/11
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