

Coastline College Financial Aid Code of Conduct and Policy on Education Loans

The Financial Aid Code of Conduct and Policy on Education Loans focuses on ensuring that those working at Coastline College:

- not take action for their personal benefit or that could be perceived as a conflict of interest;
- provide information that is accurate, unbiased, and does not reflect preference arising from actual or potential personal gain;
- provide Coastline College financial aid award notifications (and accompanying materials) that give students clear and transparent outlines of financial aid and costs;
- disclose to Coastline College any involvement with, interest in, or potential conflict of interest with any entity with which the College has a business relationship.

Preamble

This code of conduct applies to all Coastline College officers, employees, and agents who have responsibilities with respect to education loans. This code reinforces and reflects Coastline College's continuing commitment to conduct financial aid practices with integrity, free from conflicts of interest, in the interest of students, and in compliance with applicable law.

Any violations of this policy will be subject to the Coast Community College District code of conduct.

Definition

For purpose of this code of conduct, *lending institution* means:

1. Any entity that itself or through an affiliate engages in the business of making loans to students, parents or others for purposes of financing higher education expenses or that securitizes such loans; or
2. Any entity, or association of entities, that guarantees or services education loans; or
3. Any industry, trade or professional association that receives money from any entity described above in subsections (a) and (b).

I. Limitations Regarding Lending Institutions

Coastline College prohibits:

1. any revenue-sharing arrangement with any lending institution. Revenue-sharing is any arrangement by which a lender pays Coastline College a percentage of the principal loan taken by a borrower or otherwise compensates Coastline College as a result of a borrower taking a loan.
2. accepting or soliciting anything of value from any lending institution related to its education loan activity, including but not limited to: (i) revenue sharing by a lending institution with Coastline College, (ii) Coastline College's receipt from any lending institution of any computer hardware for which Coastline College pays below-market prices and (iii) printing costs or services.
3. accepting or soliciting staffing assistance from a lending institution, including but not limited to call center staffing or financial aid office staffing.
4. identifying any employee or other agent of a lending institution to students or prospective students of Coastline College or their parents as an employee or agent of Coastline College.
5. arranging with a lending institution to provide any opportunity loans, if the provision of such opportunity loans prejudices any other borrower. For purpose of this code, an opportunity loan agreement is an arrangement whereby a lending institution agrees to make loans up to a specified aggregate amount to students with poor or no credit history, or to international students whom the

lending institution claims would not otherwise be eligible for its loan programs, in exchange for concessions or promises by Coastline College that may prejudice other borrowers.

6. accepting or soliciting any funds to be used for private educational loans or opportunity pool loans in exchange for providing a lending institution with a specified number of federal loans, a specified loan volume or a preferred lender arrangement.
7. assigning a first-time borrower to a particular lender, or refusing to certify, or delaying certification, of any loan based on the borrower's selection of a lending institution.

II. Limitations on Coastline College Officers, Employees or Agents

Coastline College prohibits:

1. any officer, employee, or agent of Coastline College who has responsibility with respect to education loans 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 so serving, provided, however, that participation on advisory boards that are unrelated in any way to higher education loans shall not be prohibited by this Code. Notwithstanding the above, individuals are not prohibited from serving on a board of directors of a publicly traded or privately held company.
2. consulting or providing other contract services for a lending institution. This article does not prohibit a financial aid administrator from consulting for, or serving on an advisory board constituted by the federal government consistent with Coastline College's Policy on Conflict of Interest and Conflict of Commitment and federal law.
3. owning stock or holding any another financial interest in a lending institution, other than through ownership of shares in a publicly traded mutual fund or similar investment vehicle in which the person does not exercise any discretion regarding the investment of the assets of the investment vehicle.
4. soliciting or accepting gifts or anything of more than *de minimus* value on his or her own behalf or on behalf of another from or on behalf of a lending institution and receiving any payment or reimbursement by a lending institution to Coastline College employee for lodging, meals, or travel to conferences or training seminars. This provision shall not be construed to prohibit any officer, employee, or agent of Coastline College who has responsibility with respect to educational loans from conducting non-Coastline College business activity with any lending institution or prevent Coastline College from holding membership in any nonprofit professional association.

For purpose of this code, "gifts" include any gratuity, favor, discount, entertainment, hospitality, loan, or other item having a monetary value of more than a *de minimus* amount, including services, transportation, lodging, and meals. A gift does not include standard materials, activities or programs related to a loan being provided; favorable terms, conditions or borrower benefits provided to a student employed by Coastline College if comparable terms are provided to all students of Coastline College; philanthropic contributions to an institution unrelated to education loans; or state education grants, scholarships or financial aid funds.

III. Member of NASFAA

As members of the National Association of Student Financial Aid Administrators (NASFAA), a person employed as a financial aid administrator of Coastline College will follow the [NASFAA Code of Conduct](#).

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