

HGSAS Code of Conduct for Financial Aid Professionals

As required by the Higher Education Opportunity Act (HEOA), an institution participating in a Title IV loan program must develop, publish, administer, and enforce a code of conduct that clearly prohibits conflicts of interest for individuals involved with financial aid.

This code of conduct applies to all officers, employees, and agents of the Hazelden Graduate School of Addiction Studies (HGSAS) who are responsible for student loans and financial aid. These individuals are required to abide by these terms:

- A. The HGSAS bans revenue-sharing arrangements with any lender.** All employees are banned from participating in any revenue-sharing arrangements between the institution and lender under which the lender makes Title IV loans to students attending the institution.
- B. The HGSAS bans employees of the financial aid office from receiving gifts from a lender, guaranty agency or loan servicer.** No financial aid officer or employee of the institution may solicit or accept any gift from a lender, guarantor or servicer of education loans. A "gift" is defined as any gratuity, favor, discount, entertainment, hospitality, loan, or other item having monetary value of more than a de minimus amount.
- C. The HGSAS bans contracting arrangements.** No officer or employee of the institution's financial aid office may accept from a lender, or an affiliate of any lender, any fee, payment, or other financial benefit as compensation for any type of consulting arrangement or contract to provide service to or on behalf of a lender relating to education loans.
- D. The HGSAS prohibits against directing borrowers to particular lenders or delaying loan certifications.** For any first-time borrower, an employee of the institution's financial aid office may not assign, through the award packaging or other methods, the borrower's loan to a particular lender. The HGSAS may not refuse to certify, or delay the certification, of any loan based on the borrower's selection of a particular lender or guaranty agency.
- E. The HGSAS prohibits offers of funds for private loans.** The institution may not request or accept from any lender any offer of funds for private loans, including funds for an opportunity pool loan, to students in exchange for providing concessions or promises to the lender for a specific number of Title IV loans made, insured, or guaranteed, a specified loan volume, or a preferred lender arrangement.
- F. The HGSAS bans staffing assistance.** The institution may not request or accept from any lender any assistance with call center staffing or financial aid office staffing, except that a lender may provide professional development training and educational counseling materials. However, the lender may provide short-term, non-recurring staffing assistance in the event of a declared emergency or disaster.
- G. The HGSAS bans advisory board compensation.** Any employee of the institution's financial aid office who serves on an advisory board, commission, or group established by a lender or guarantor is prohibited from receiving anything of value from the lender, guarantor, or group.

Violations of this code will result in disciplinary action including written warnings, suspensions, or termination.