

**VCCCD Code of Conduct/Conflict of Interest Policy**  
**Statement of Ethical Principles and Code of Conduct**

**STATEMENT OF ETHICAL PRINCIPLES**

The primary goal of the financial aid professional is to help students achieve their educational goals through financial support and resources. NASFAA members are required to exemplify the highest level of ethical behavior and demonstrate the highest level of professionalism. The following guidelines were last updated by NASFAA's Board of Directors in March 2014.

We, financial aid professionals, declare our commitment to the following Statement of Ethical Principles.

Financial aid administrators shall:

**Advocate for students**

- Remain aware of issues affecting students and continually advocate for their interests at the institutional, state and federal levels.
- Support federal, state and institutional efforts to encourage students, as early as the elementary grades, to aspire to and plan for education beyond high school.

**Manifest the highest level of integrity**

- Commit to the highest level of ethical behavior and refrain from conflict of interest or the perception thereof.
- Deal with others honestly and fairly, abiding by our commitments and always acting in a manner that merits the trust and confidence others have placed in us.
- Protect the privacy of individual student financial records.
- Promote the free expression of ideas and opinions, and foster respect for diverse viewpoints within the profession.

**Support student access and success**

- Commit to removing financial barriers for those who want to pursue postsecondary learning and support each student admitted to our institution.
- Without charge, assist students in applying for financial aid funds.
- Provide services and apply principles that do not discriminate on the basis of race, gender, ethnicity, sexual orientation, religion, disability, age, or economic status.
- Understand the need for financial education and commit to educate students and families on how to responsibly manage expenses and debt.

**Comply with federal and state laws**

- Adhere to all applicable laws and regulations governing federal, state, and institutional financial aid programs.
- Actively participate in ongoing professional development and continuing education programs to ensure ample understanding of statutes, regulations, and best practices governing the financial aid programs.
- Encourage colleagues to participate in the financial aid professional associations available to them at the state, regional, or national level and offer assistance to other aid professionals as needed.

**Strive for transparency and clarity**

- Provide our students and parents with the information they need to make good decisions about attending and paying for college.
- Educate students and families through quality information that is consumer-tested when possible. This includes (but is not limited to) transparency and full disclosure on award notices.
- Ensure equity by applying all need-analysis formulas consistently across the institution's full population of student financial aid applicants.
- Inform institutions, students, and parents of any changes in financial aid programs that could affect their student aid eligibility.



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**Protect the privacy of financial aid applicants**

- Ensure that student and parent private information provided to the financial aid office by financial aid applicants is protected in accordance with all state and federal statutes and regulations, including FERPA and the Higher Education Act, Section 483(a)(3)(E) (20 U.S.C. 1090).
- Protect the information on the FAFSA from inappropriate use by ensuring that this information is only used for the application, award, and administration of aid awarded under Title IV of the Higher Education Act, state aid, or aid awarded by eligible institutions.

**CODE OF CONDUCT**

The following Code of Conduct was last updated by NASFAA's Board of Directors in March 2014. Subject to enforcement procedures that go into effect July 1, 2015, NASFAA institutional members of NASFAA will ensure that:

1. No action will be taken by financial aid staff that is for their personal benefit or could be perceived to be a conflict of interest.
  - a. Employees within the financial aid office will not award aid to themselves or their immediate family members. Staff will reserve this task to an institutionally designated person, to avoid the appearance of a conflict of interest.
  - b. If a preferred lender list is provided, it will be compiled without prejudice and for the sole benefit of the students attending the institution. The information included about lenders and loan terms will be transparent, complete, and accurate. The complete process through which preferred lenders are selected will be fully and publically disclosed. Borrowers will not be auto-assigned to any particular lender.
  - c. A borrower's choice of a lender will not be denied, impeded, or unnecessarily delayed by the institution, even if that lender is not included on the institution's preferred lender list.
  - d. No amount of cash, gift, or benefit in excess of a de minimis amount shall be accepted by a financial aid staff member from any financial aid applicant (or his/her family), or from any entity doing business with or seeking to do business with the institution (including service on advisory committees or boards beyond reimbursement for reasonable expenses directly associated with such service).
2. Information provided by the financial aid office is accurate, unbiased, and does not reflect preference arising from actual or potential personal gain.
3. Institutional award notifications and/or other institutionally provided materials shall include the following:
  - a. A breakdown of individual components of the institution's Cost of Attendance, designating all potential billable charges.
  - b. Clear identification of each award, indicating type of aid, i.e. gift aid (grant, scholarship), work, or loan.
  - c. Standard terminology and definitions, using NASFAA's glossary of award letter terms.
  - d. Renewal requirements for each award.
4. All required consumer information is displayed in a prominent location on the institutional web site(s) and in any printed materials, easily identified and found, and labeled as "Consumer Information."
5. Financial aid professionals will disclose to their institution any involvement, interest in, or potential conflict of interest with any entity with which the institution has a business relationship.

Refer to NASFAA's Statement of Ethical Principles, Enforcement Procedures, as well as the Ethical Principles, Code of Conduct and Enforcement Procedures Q&A for more information about NASFAA's ethical guidelines and how they are enforced. To report a potential violation of NASFAA's Code of Conduct, refer to the Ethics Complaint Submission Form.

**VCCCD Financial Aid Professional Conflict of Interest Statement and Disclosure Form**

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 the College or District. In order to prevent instances or appearances of a conflict of interest, no employee may process any transaction related to his/her own personal financial aid eligibility or that of a relative or other individual for whom a conflict of interest may be present.

Financial Aid professionals must disclose any potential conflict of interest to their immediate supervisor and make every effort to avoid acting in a manner that might compromise independence of judgment with which the employee performs his/her responsibilities at the College or the District.