

# Code of Conduct

The Financial Aid Office at Saint Anthony College of Nursing abides by NASFAA's Code of Conduct for Institutional Financial Aid Professionals which states we are required to exemplify the highest level of ethical behavior in helping students and families find the best ways to pay for college and demonstrate the highest level of professionalism, all while remaining good stewards of public and institutional funds. The principles contained herein focus on reaffirming our professional commitment to transparency, compliance and above all students, who have become reliant on federal, state and institutional aid programs to fulfill their educational goals and dreams. In doing so, the Financial Aid Office at Saint Anthony College of Nursing is bound by the following:

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.

## **Definitions**

**Revenue Sharing Arrangement** -- means an arrangement between an institution and a lender under which:

- I. A lender provides or issues a loan that is made, insured or guaranteed under this title to students attending the institution or to the families of such students and
- II. The institution recommends the lender or the loan products of the lender in exchange, the lender pays a fee or provides other material benefits, including revenue or profit sharing to the institution, an officer or an employee of the institution, or an agent.

**Gift** -- means any gratuity, favor, discount, entertainment, hospitality, loan or other item having a monetary value of more than a de minimus (gift of not more than \$10) 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.

**Opportunity Pool Loan** -- means a private education loan made by the lender to a student attending the institution or the family member of such a student that involves a payment directly or indirectly, by such institution of points, premiums, additional interest, or financial support to such lender for the purpose of such lender extending credit to the student or the family.