

**State College of Florida Manatee-Sarasota (SCF)  
Office of Financial Aid  
Code of Conduct and Ethics**

**Scope**

This procedure applies to all financial aid employees regardless of rank or employment type.

**Introduction**

The Higher Education Opportunity Act (HEOA) requires educational institutions to develop and comply with a code of conduct that prohibits conflicts of interest for financial aid personnel [ HEOA § 487(a)(25)]. Any SCF officer, employee, or agent who has responsibilities with respect to student educational loans must comply with this code of conduct.

SCF's stands for the core values of accountability, honesty, and integrity. As such, we expect all employees to be directed by the same values in their judgment and behavior.

Open communication and expression should be guided by the desire for a respectful, safe, and collaborative working environment. Employees must work to protect SCF and its legal obligations by complying with all laws.

All employees should respect their colleagues, supervisors, and customers. Any discriminatory behavior or harassment will not be tolerated.

**Code of Conduct**

- I. No officer, trustee or employee of State College of Florida (SCF) shall accept anything of more than nominal value on his or her behalf or on behalf of another person or entity from any Lending Institution. For example, cash, stocks, gifts, entertainment, expense-paid trips, etc. should never be accepted from a Lending Institution. Likewise, an individual should never receive payment or reimbursement from a Lending Institution for lodging, meals or travel to conferences or training seminars. However, an officer, trustee or employee of SCF 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) Conduct College business and, subject to state law, receive value on behalf of the College that is unrelated 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 like value from the tax-exempt organization for such activities.

## II. College employees should not serve on lender advisory boards for remuneration

No officer, trustee or employee of the College who makes financial aid decisions for the College or who is employed 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 a student loan advisory board of a Lending Institution or any reimbursement of expenses for such service. Any officer, trustee or employee of the College who serves as a member or participant of a lending Institution board shall recuse himself or herself from any board discussions regarding the College's financial aid operations.

## III. The College should not provide any advantage to a Lending 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. Likewise, the College shall not allow any Lending Institution to:

- a) Staff at the College's financial 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 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.

## IV. The College shall not enter into any agreement with a Lending institution to provide alternative (i.e., non-federal or "opportunity") student loan programs if the provision of such alternative loan programs prejudices other students or parents.

## V. The College should make appropriate use of any Preferred Lender Lists

If the College decides to promulgate a list or lists of preferred or recommended lenders for student loans or similar ranking or designation ("Preferred Lender List"), the selection of Lending Institution for inclusion on the Preferred Lender List shall be based on the best interests of the College's students and their parents without regard to the financial interests of the College. In addition, any Preferred Lender List shall clearly explain:

- a) Students and their parents are free to select the Lending Institution of their choice and will suffer no penalty imposed by the College from using a Lending Institution

that is not a “preferred lender”;

- b) Students and their parents are not required to use any of the “preferred lenders”;
- c) Where to find information on other Lending Institutions for student loans;
- d) The College will promptly certify any loan from any Lending Institution selected by a borrower, in accordance with US Department of Education regulations;
- e) The process the College utilized to select “preferred lenders”, including but not limited to the criteria used and the relative importance of such criteria;
- f) Where to find information on the interest rate, loan servicing or other benefits offered by “preferred lenders”, and,
- g) Where to find information on any agreements by “preferred lenders” to sell their loans to other Lending Institutions
- h) The College shall review any Preferred Lender List on an annual basis to determine that the information appearing on the list is accurate and that any Web site links are still viable.

### **Fraud Deterrence, Prevention and Detection**

The following practices are established to prevent loss and protect employees and the State College of Florida Manatee-Sarasota (SCF) by maintaining effective safeguards to aid in the deterrence, prevention, and detection of fraud.

SCF intends to conduct reviews of all financial aid forms, submitted by, or on behalf of financial aid employees and for anyone who by virtue of their personal relationship with a financial aid employee could be perceived as a conflict of interest. All SCF employees are required to disclose conflicts of interests.

- I. Effective immediately, forms submitted by financial aid employees will be subject to review and verification, including but not limited to, the FAFSA applications and SAP appeals in accordance with federal, state, local and college rules, and procedures. In addition, to avoid any perception of, or actual conflict of interest, employees are required to refrain from reviewing financial aid forms, in particular, FAFSA verification and SAP Appeals, where a conflict of interest could impair or be perceived to impair their judgement.
- II. Any irregularity that is detected or suspected must be reported immediately to the Vice President of Finance and Administration, who coordinates investigation of reports of known or suspected fraud. Investigation results will not be disclosed or discussed with anyone other than those who have a legitimate need to know or as required by law

### **Disciplinary Actions**

Employees who repeatedly or deliberately fail to follow our code of conduct will be subject to appropriate disciplinary action.

Legal actions may be taken in cases of theft, embezzlement, corruption, and other unlawful actions