

Student loan Code of Conduct

The Higher Education Opportunity Act (HEOA) requires educational institutions to develop and comply with a Code of Conduct that prohibits conflicts of interest in student financial services. Any Marshalltown Community College officer, employee, or agent who has responsibilities with respect to student educational loans must comply with the Code of Conduct.

The obligations in this Code of Conduct are in addition to any requirements imposed by state ethics laws, federal laws, or Marshalltown Community College policies, i.e., the stricter standard of ethical behavior will apply in all instances.

1. Marshalltown Community College (MCC) and its affiliates have no preferred lending agreement with any lender of private educational loans and as such no officer or employee of MCC shall engage in the practice of recommending, promoting or endorsing private educational loans for students attending MCC.
2. Neither MCC as an institution nor any individual officer, employee, agent or affiliate employee shall enter into revenue-sharing arrangement with any lender.
 - a. "Revenue-sharing arrangement" includes circumstances where an institution recommends a lender or the loan products of a lender who provides or issues a loan in exchange for a fee or provision of material benefits, including revenue or profit sharing, to the institution, or employee or agent of the institution.
3. No officer or employee of MCC who is employed in the Financial Aid Office or who otherwise has responsibilities with respect to education loans, or an agent who has responsibilities with respect to education loans, or any of their family members, shall solicit or accept any gift from a lender, guarantor, or servicer of education loans.
 - a. For purposes of this prohibition, the term "gift" means any gratuity, favor, discount, entertainment, hospitality, loan, or other item having a monetary value of more than a de minimus amount. (The term includes a gift of services, transportation, lodging, or meal, whether provided in kind, by purchase of a ticket, payment in advance, or reimbursement after the expense has been incurred.)
4. An officer or employee of MCC who is employed in the Financial Aid Office or who otherwise has responsibilities with respect to education loans, or an agent who has responsibilities with respect to education loans, shall not accept from any lender or affiliate of any lender a fee, payment, or other financial benefit (including the opportunity to purchase stock) as compensation for any type of consulting arrangement or other contract to provide services to a lender or on behalf of a lender relating to education loans.
5. MCC offers the William D. Ford federally guaranteed Direct Loan to eligible applicants. In regard to any educational loans other than the federal Direct Loan, MCC shall not:
 - a. For any first-time borrower, assign, through award packaging or other methods, the borrower's loan to a particular lender; or
 - b. Refuse to certify, or delay certification of, any loan based on the borrower's selection of a particular lender or guaranty agency.
6. MCC shall not request or accept from any lender any Philanthropic contributions related to educational loans, any offer of funds to be used for private education loans, including funds for an opportunity pool loan, to students in exchange for the institution providing concessions or promises regarding providing the lender with respect to:
 - a. A specified number of private loans;
 - b. A specified loan volume of such loans; or
 - c. A preferred lender arrangement for such loans.

"Opportunity pool loan" means a private education loan made by a 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.

7. MCC shall not request or accept from any lender any assistance with financial aid call center staffing or Financial Aid Office staffing.
8. Any MCC employee who is employed in the Financial Aid Office, or who otherwise has responsibilities with respect to education loans or other student financial aid shall not serve on or otherwise participate with advisory councils of lenders or affiliates of lenders.