

Financial Code of Conduct	Document No.	
	Effective Date	5-25-10
	Revision Date	
	Revision No.	1.0
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	Approval:	

1.0 Purpose

This policy establishes guidelines for trustees, employees, and agents conduct with lenders.

2.0 Revision History

Date	Rev. No.	Change	Ref Section
	1.0	Policy rewrite.	

3.0 Persons Affected

- 3.1 All college employees and agents.
- 3.2 The Casper College Board of Trustees.
- 3.3 Any affiliated organization of Casper College.
- 3.4 Lenders who work with the college.

4.0 Policy

The policy of Casper College is to ensure the following.

- 4.1 The college complies with the Higher Education Opportunity Act.
- 4.2 Trustees, employees, or agents shall not enter into any revenues sharing arrangements with any lenders.
- 4.3 Trustees, employees, or agents shall not solicit or accept gifts from a lender.
- 4.4 Trustees, employees, or agents shall not accept compensation for any type of consulting arrangement or other contract to provide services to a lender or on the behalf of such organizations, relating to educational loans.

- 4.5 Trustees, employees, or agents shall not steer borrowers to a particular lender, delay loan certifications, or assign any first-time borrower's loan to a particular lender.
- 4.6 Trustees, employees, or agents shall not request or accept any assistance with call center or financial aid office staffing from any lender.
- 4.7 Trustees, employees, or agents shall not refuse, certify, or delay certification of any loan based on the borrower's selection of a particular lender.
- 4.8 Trustees, employees, or agents shall not request or accept any offer of funds for private education loans from any lender in exchange for providing the lender with a specified number or volume of or a preferred lender arrangement for Title IV loans.
- 4.9 Trustees, employees, or agents shall not derive any gifts or compensation from serving on an advisory board, commission, or group established by a lender or group of lenders. They may be reimbursed for reasonable expenses incurred as part or serving on such an advisory board, commission, or group.

## 5.0 Definitions

- 5.1 Agent. Any person or organization with the authority to act on behalf of the college.
- 5.2 Affiliated Organization. Any organization that is directly or indirectly related to the college and engages in the practice of recommending, promoting, or endorsing education loans for student or their families including, but not limited to, alumni, athletic, foundations, or social, academic, or professional organizations of the college.
- 5.3 Gift. Any gratuity, favor, discount, entertainment, hospitality, loan, or other item having a monetary value of more than a nominal amount.
- 5.4 Compensation. This type of benefit includes any fee, payment, or other financial benefit including the opportunity to purchase stock.
- 5.5 Lender. This group of financial institutions includes lenders, guaranty agencies, or loan service providers.
- 5.6 Title IV Loans. This group of federal student financial aid programs includes programs covered by the Higher Education Act.

## 6.0 Responsibilities

6.1 Trustees, employees, or agents are responsible for ensuring compliance of this policy.

7.0 Procedures

7.1 N/A