Heritage Christian University
Statement of Ethical Principles and Code of Conduct

HCU Office of Financial Aid Statement of Ethical Principles

As a member of the National Association of Student Financial Aid Administrators (NASFAA), the Office of Financial Aid at Heritage Christian University has put into operation the NASFAA’s Statement of Ethical Principles and Code of Conduct, which provides that the primary goal of the institutional financial aid professional (IFAP) is to help students achieve their educational potential by providing appropriate financial resources. To this end, this Statement provides that Heritage Christian University IFAPs shall:

Be committed to removing financial barriers for those who wish to pursue postsecondary learning.

Make every effort to assist students with financial need.

Be aware of the issues affecting students and advocate their interests at the institutional, state, and federal levels.

Support efforts to encourage students, as early as the secondary level, to aspire to and plan for education beyond high school.

Educate student and families through quality consumer information.

Respect the dignity and protect the privacy of students, and ensure the confidentiality of student records and personal circumstances.

Ensure equity by applying all need analysis formulas consistently across the institution’s full population of student financial aid applicants.

Provide services that do not discriminate on the basis of race, gender, ethnicity, sexual orientation, religion, disability, age, or economic status.

Recognize the need for professional development and continuing education opportunities.

Promote the free expression of ideas and opinions, and foster respect for diverse viewpoints within the profession.

Commit to the highest level of ethical behavior and refrain from conflict of interest or the perception thereof.

Maintain the highest level of professionalism, reflecting a commitment to the goals of the National Association of Student Financial Aid administrators.
HCU Office of Financial Aid Code of Conduct

The Code as enacted on August 14, 2008, is intended to help guide financial aid professionals in carrying out their obligations, particularly with regard to ensuring transparency in the administration of the student financial aid programs, and to avoid the harm that may arise from actual, potential, or perceived conflict of interest.

The HCU Code of Conduct is modeled after the NASFAA Code of Conduct for Institutional Financial Aid Professionals (IFAP) and modified to comply with HEOA regulations. HCU financial aid professionals are expected to always maintain exemplary standards of professional conduct in all aspects of carrying out his or her responsibilities, specifically including all dealings with any entities involved in any manner in student financial aid, regardless of whether entities are involved in a government sponsored, subsidized, or regulated activity. In doing so, a financial aid professional shall:

1. Refrain from taking any action for his or her personal benefit or that reasonably could appear to be for his or her personal benefit. All employees and agents of the Office of Financial Aid who process loans, scholarships from outside donors and other monies received for students shall do so in compliance with all applicable laws and regulations, and they shall not solicit, accept or receive any compensation or gift from any lender, guarantor, servicer, or agency in connection therewith. HCU shall not enter into any revenue sharing arrangements with any lender or agency.

   “Gift” means any gratuity, favor, discount, entertainment, hospitality, loan, or other item having a monetary value of more than a de minimus amount, including services, transportation, lodging, and meals. A gift does not include standard materials, activities or programs related to a loan being provided; food, refreshments, training, or informational materials provided as part of a training session conducted by a lender, guarantor, servicer, or agency intended to improve HCU services; favorable terms, conditions, or borrower benefits provided to a student employed by HCU if comparable terms are provided to all HCU students; entrance and exit counseling services provided to borrowers as long as HCU’s Office of Financial Aid staff is in control of the counseling and the counseling does not promote one specific lender; philanthropic contributions to HCU that are unrelated to education loans; or state education grants, scholarships or financial aid funds.

2. Refrain from taking any action that is contrary to law, regulation, or the best interests of the students and parents that he or she serves. Office of Financial Aid staffs’ number one priority is to serve and act in the best interest of HCU students. In pursuing this goal, staff must remain cognizant of all federal and state regulations and institutional policies and remain in compliance with such regulations and policies, including, without limitation, (i) not accepting any funds to be used for private education loans in exchange for HCU providing concessions to the private lender, and (ii) not accepting assistance with call center staffing or financial aid office staffing from any lender, guarantor, servicer, or agency, except that HCU may accept professional development training for its financial aid administrators, counseling,
financial literacy, and debt management materials from lenders, guarantors, servicers or agencies as well as short-term, non-recurring staffing assistance during an emergency.

3. Ensure that the information provided is accurate, unbiased, and does not reflect any preference arising from actual or potential personal gain. Neither the Office of Financial Aid nor any of its staff shall receive personal gain from their interactions with outside lenders, guarantors, servicers, or agencies. To this end, HCU prohibits receipt of any fees, payments, or other financial benefits for consulting services by any HCU employee or agent with responsibilities with respect to education loans, provided, however, those HCU employees and agents not serving in the Office of Financial Aid and having no connections to HCU’s educational loans may serve on the board or directors of a lender, guarantor, servicer or agency.

4. Be objective in making decisions and advising HCU regarding relationships with any entity involved in any aspect of student financial aid. Employees shall base their decisions on what is in the best interests of HCU students as a whole and what is allowable under federal and state law. Again, no staff of the Office of Financial Aid shall solicit, accept, or receive any gifts from any lender, guarantor, servicer, or agency. HCU prohibits any employee from assigning a first-time student borrower’s loan to a particular lender, guarantor, servicer or agency and requires authorized HCU employees to certify, without delay, any loan regardless of the lender, guarantor, servicer, or agency a student borrower selects.

5. Not serve on any advisory board for any lender, guarantor, servicer or agency that directly relates to student financial aid. Any waiver of this rule must be granted by the Vice President of Academic Affairs and the Director of Financial Aid. Such a waiver will only be granted if it has determined that such service is in the best interest of HCU and its students and will not result in a conflict of interest. If a waiver is granted, the individual so serving shall refrain from soliciting, accepting or receiving anything of value from the lender, guarantor, servicers, or agency in connection with the service, except with the prior approval of the Vice President of Academic Affairs and the Director of Financial Aid, the reimbursement of reasonable expenses associated may be accepted. The restriction is not intended to apply to service on boards or committees of other institutions of higher education, associations of institutions of higher education or governmental entities.

6. Disclose to HCU any involvement with or interest in any entity involved in any aspect of student financial aid. No one in the Office of Financial Aid should have a financial interest in any of the student loan companies in which HCU does business.