

## Heritage Christian University

### Statement of Ethical Principles and Code of Conduct

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:

#### **Advocate for students**

- Remain aware of issues affecting students and continually advocate for their interests at the institutional, state and federal levels.
- Support federal, state and institutional efforts to encourage students, as early as the elementary grades, to aspire to and plan for education beyond high school.

#### **Manifest the highest level of integrity**

- Commit to the highest level of ethical behavior and refrain from conflict of interest or the perception thereof.
- Deal with others honestly and fairly, abiding by our commitments and always acting in a manner that merits the trust and confidence others have placed in us.
- Protect the privacy of individual student financial records.
- Promote the free expression of ideas and opinions, and foster respect for diverse viewpoints within the profession.

#### **Support student access and success**

- Commit to removing financial barriers for those who want to pursue postsecondary learning and support each student admitted to our institution.
- Without charge, assist students in applying for financial aid funds.
- Provide services and apply principles that do not discriminate on the basis of race, gender, ethnicity, sexual orientation, religion, disability, age, or economic status.
- Understand the need for financial education and commit to educate students and families on how to responsibly manage expenses and debt.

## **Comply with federal and state laws**

- Adhere to all applicable laws and regulations governing federal, state, and institutional financial aid programs.
- Actively participate in ongoing professional development and continuing education programs to ensure ample understanding of statutes, regulations, and best practices governing the financial aid programs.
- Encourage colleagues to participate in the financial aid professional associations available to them at the state, regional, or national level and offer assistance to other aid professionals as needed.

## **Strive for transparency and clarity**

- Provide our students and parents with the information they need to make good decisions about attending and paying for college.
- Educate students and families through quality information that is consumer-tested when possible. This includes (but is not limited to) transparency and full disclosure on award notices.
- Ensure equity by applying all need-analysis formulas consistently across the institution's full population of student financial aid applicants.
- Inform institutions, students, and parents of any changes in financial aid programs that could affect their student aid eligibility.
- Strive to ensure that cost of attendance components are developed using resources that represent realistic expenses.

## **Protect the privacy of financial aid applicants**

- Ensure that student and parent private information provided to the financial aid office by financial aid applicants is protected in accordance with all state and federal statutes and regulations, including FERPA and the Higher Education Act, Section 483(a)(3)(E) (20 U.S.C. 1090).
- Protect the information on the FAFSA from inappropriate use by ensuring that this information is only used for the application, award, and administration of aid awarded under Title IV of the Higher Education Act, state aid, or aid awarded by eligible institutions.

## HCU Office of Financial Aid Code of Conduct

In response to the enactment of the Higher Education Opportunity Act in August of 2008 and updated January 2021, **Heritage Christian University's Office of Financial Aid has adopted the following NASFAA (National Association of Student Financial Aid Administrators) Code of Conduct.** The Code 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 Code helps to ensure ethical behavior and the highest level of professional practices. 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 ensure that:

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 publicly 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 financial aid offers and/or other institutionally provided materials shall include the following:

- Breakdown of estimated individual [Cost of Attendance](#) components, including which are [direct](#) (billed by the institution) costs vs. [indirect](#) (not billed by the institution) costs
- Clear identification and proper grouping of each type of aid offered indicating whether the aid is a [grant/scholarship](#), [loan](#), or [work program](#)
- Estimated [net price](#)
- Standard terminology and definitions, using NASFAA's [glossary of terms](#)
- Renewal requirements for each aid type being offered as well as next steps and financial aid office contact information

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.