



## Code of Conduct of UH & Financial Aid Employees

A University of Hawai'i financial aid employee is 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 such entities are involved in a government sponsored, subsidized, or regulated activity. In doing so, a financial aid employee should:

- Refrain from taking any action for his or her personal benefit, refrain from taking any action he or she believes is contrary to law, regulation, or the best interests of the students and parents he or she serves;
- Ensure that the information he or she provides is accurate, unbiased, and does not reflect any preference arising from actual or potential personal gain;
- Be objective in making decisions and advising their campus regarding relationships with any entity involved in any aspect of student financial aid;
- Refrain from soliciting or accepting anything of other than nominal value from any entity (other than an institution of higher education or a governmental entity such as the U.S. Department of Education) involved in the making, holding, consolidating or processing of any student loans, including anything of value (including reimbursement of expenses) for serving on an advisory body or as part of a training activity of or sponsored by any such entity; and disclose to their campus' Chief Student Affairs Officer any involvement with or interest in any entity involved in any aspect of student financial aid.

The following are specifically prohibited:

- Revenue sharing agreements with lenders.
- Engaging in any activity that creates a conflict of interest.
- Accepting gifts above a nominal value from lenders or guarantors.
- Accepting private loans conditioned on the use of a lender's Title IV loans.
- Contracting arrangements with a lender that provides compensation to school staff (with certain exceptions).
- Assigning a lender to a borrower or refusing to certify a loan for a borrower's choice of lender or guarantor.
- Accepting from lenders any staffing assistance for a call center or the financial aid office.
- Accepting compensation for service on an advisory board, except reasonable expenses associated with the service may be reimbursed by the lender or guarantor.

For the purposes of this Code of Conduct, it is not considered a “gift” to the school for a lender or guarantor to provide the following:

- Standard materials, activities or programs on issues related to a loan, default aversion, default prevention or financial literacy (for example, brochures, workshops or training).
- Food, refreshments, training or informational material that is designed to improve the service of a lender, guarantor or servicer if the training contributes to the professional development of the school staff.
- Favorable terms, conditions and borrower benefits, as long as these are provided to all students at the school.
- Entrance and Exit counseling services, as long as the school controls the counseling and does not promote the products and services of the lender.

The Honolulu Community College Financial Aid Office is expected to maintain exemplary standards of professional conduct in carrying out all aspects of its responsibilities and must avoid any conflicts of interests with respect to federal and private education loans. Honolulu Community College does not partner with lenders. Honolulu Community College processes all federal student loans via the William D. Ford Federal Direct Loan Program.