

# **Private or Alternative (Private) Student Loan Code of Conduct Policy and Procedures**

## **Financial Assistance Services St. Petersburg College**

Author: Marcia McConnell

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Revised: Will Scott & Lee Ann Wolfenden

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Reviewed: Wayne Kruger

### **Purpose**

Guidance on how to identify and avoid any conflict of interest between St. Petersburg College, its students or their parents in the private or alternative (private) student loan process.

### **Policy**

The following policy ensures the integrity of the student loan process at St. Petersburg College, thus providing fair and affordable access to higher education. A college employee is defined as any trustee, officer, board member, Administrative & Professional, Career, OPS or student employee. A lending institution is any entity (other than an institution of higher education or governmental entity such as the U.S. or Florida Department of Education) involved in the making, holding, consolidating or processing of any student loans.

### **College employees should receive no personal benefits**

Employees of the college may not accept anything of value on his or her behalf or on behalf of another person or entity from any lending institution, including, but not limited to:

- Cash or stocks
- Gifts, entertainment or trips
- Payment or reimbursement for lodging, meals or travel to conferences or training seminars

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An employee may conduct the following:

- Non-college business, so long as such value is not intended to influence the employee in conducting college business
- College business and, subject to state law, receive value on behalf of the college that is unrelated to the student loan activities of the lending institution
- Attend professional conferences and meetings of organizations that are funded or sponsored by more than one entity and, subject to state law, receive materials, refreshments or other things of like value
- Hold membership in, serve on the board of or participate in the activities of any professional organization and, subject to state law, receive travel reimbursements and other things of like value from the professional organization for such activities

### **College employees should not serve on lending institution advisory boards for remuneration**

Employees of the college who make financial aid decisions for the college or who are employed in, supervise or otherwise have responsibility or authority over Financial Assistance Services may not receive any remuneration for serving as a member or participant of a student loan lending institution advisory board or any reimbursement of expenses for such service. Any employee of the college who serves as a member or participant of a lending institution advisory board shall recuse himself or herself from any board discussions regarding the college's financial aid operations.

The college may accept any assistance that is authorized by 34 CFR 682.200(b)(5)(i) (definition of "lender").

### **The College should not provide any advantage to a lending institution**

The college shall not accept anything of value from any lending institution in exchange for any advantage or considerations provided to the lending institution related to its student loan activities, including but not limited to the college shall not allow any lending institution to staff Financial Assistance Services; communicate with the college's students or their parents in such a manner as to create the impression that the lending institution is an employee or agent of the college in connection with the college's student financial aid operations, including through the use of mascots, logos, etc.; or enter into any agreement with a lending institution to provide private or opportunity student loan programs if the

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provision of such loan program prejudices other students or parents.

The college may offer loans to its international students, at fair market rates when such students would otherwise be unable to secure a domestic loan.

#### **The college should make appropriate use of any Preferred Lender Lists**

The college maintains a Preferred Lender List for private student loans. The selection of lending institutions is based on the best interests of the college's students and their parents without regard to the financial interests of the college. The college shall not place a lending institution on the Preferred Lender List for a particular type of student loan in exchange for benefits provided to the college, its students or their parents in connection with a different type of student loan. The Preferred Lender List may be made available to students and parents through a third party vendor. The Preferred Lender List shall clearly explain the following:

- Students and their parents are free to select the lending institution of their choice and will suffer no penalty imposed by the college from using a lending institution that is not a "preferred lender"
- Students and their parents are not required to use any of the "preferred lenders"
- The college will promptly certify any loan from any lending institution selected by a borrower, in accordance with U.S. Department of Education regulations
- The process the college utilized to select "preferred lenders," including but not limited to the criteria and the relative importance of such criteria
- Where to find information on competitive interest rates, terms and conditions of federal loans
- Where to find information on the interest rate, loan servicing or other benefits offered by "preferred lenders" and
- Where to find information on any agreements by "preferred lenders" to sell their loans to other lending institutions

The college shall review any Preferred Lender List on an annual basis to determine that the information appearing on the list is accurate and that any website links are still viable.

## **Procedure**

### **How to handle a potential Student Loan Code of Conduct violation**

1. Staff should refer any potential student loan code of conduct violation to their immediate supervisor for review. The immediate supervisor will review each case and document their findings.
2. If it is determined that a violation exists, the immediate supervisor will refer the violation to their immediate supervisor, who will determine the next course of action.
3. If a staff member has knowledge that they have inadvertently participated in a violation, they should immediately submit that case to the Associate Vice President, an Executive Director or an Associate Director for review.

### **Notification of the Identified Student Loan Code of Conduct**

Immediate supervisors must notify their immediate supervisor of the identified violation, including:

- Name of involved employee(s), including OPS & FWS
- Detailed description of the violation

### **Annual Student Loan Code of Conduct Acknowledgment**

Every staff member must complete the Student Loan Code of Conduct Acknowledgment annually after summer term ends and before fall term begins. New employees, including OPS & FWS, must complete the Student Loan Code of Conduct Acknowledgment upon hire and then again after summer term ends and before fall term begins, even if it was completed less than 12 months prior. Completed acknowledgments will be kept on file.

#### ***Annual Student Loan Code of Conduct Acknowledgment:***

I have read the Student Loan Code of Conduct Policy and Procedures. I fully understand and agree to abide by my responsibilities regarding student loans and potential violations and duties I may be assigned while employed in Financial Assistance Services. I understand that failure to abide by this policy may result in disciplinary action being taken against me.