**F.2.4 (Policy) Student Financial Aid** Responsible Department: Vice Chancellor for Finance and Administration Board Adoption: 5-19-09 Last Board Action: 12-13-22, 05-21-24

#### **Financial Aid Programs**

The objective of the Alamo Colleges financial aid programs is to ensure that each of the Alamo institution's student financial aid programs provide assistance to students, who, without such assistance, may not be able to pursue higher education. Financial assistance at each institution may include, but is not limited to, loans, scholarships, grants, and employment. No student or prospective student shall be excluded from participation in or denied the benefits of any financial aid program at the institution on the basis of race, color, national origin, religion, sex (gender), disability, veteran status, or other protected criteria.

20 U.S.C. 1681 (Title IX); 42 U.S.C. 2000d (Title VI); 29 U.S.C. 794 (Section 504); 42 U.S.C. 12132 (Americans with Disabilities Act [ADA])

## **Code of Conduct**

Staff of the Alamo Colleges Student Financial Aid Office shall abide by the Statement of Ethical Principles and Code of Conduct for Financial Aid Professionals as approved by the National Association of Student Financial Aid Administrators, March 2014 (NASFAA).

Statement of Ethical Principles

- 1. Advocate for students
- 2. Manifest the highest level of integrity
- 3. Support student access and success
- 4. Comply with federal and state laws
- 5. Strive for transparency and clarity
- 6. Protect the privacy of financial aid applicants

Code of Conduct

- 1. No action will be taken by staff that is for their personal benefit or could be perceived as a conflict of interest (see Conflict of Interest below).
- 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 award notifications and or other institutionally provided materials will include a breakdown of individual components, clear identification of each award, standard terminology and definitions, and renewal requirements for each award.
- 4. All required consumer information is displayed in a prominent location on their website.
- 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.

## **Conflict of Interest**

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. Student Financial Aid staff will not process the records of or award aid to any current or former family members. Instead; these tasks shall be given to another designated staff member who is at least a Director or above to avoid the appearance of a conflict of interest.

Staff in the Student Financial Aid department are prohibited from personally awarding or approving financial aid for Alamo Colleges employees. Exceptions are made solely for those in the roles of Student Financial Aid Director or District Director.

## **Title III Matching Waiver**

Title IV regulations (Part 606 of 34 CFR, Volume 6, Chapter 1, p 6-17 of 2012-2013 SFA Handbook) allow institutions that have been designated as Title III Hispanic Serving institutions to waive the 25% matching requirement for Federal College Work Study (FCWS) and Federal Supplemental Educational Opportunity Grant (FSEOG). The Texas Higher Education Coordinating Board also allows this waiver (Subchapter M, Section 21.405(b) in their Student Services Policy Manual. If and/or when Alamo Colleges is notified of this designation annually; it shall waive the matching requirement for these program awards and place an amount of funds equal to the 25% match, based on the current allocation, into a restricted multi-year fund. These funds are to be used as a reserve for the payment of student wages when the federal allocation of FCWS funds has been exhausted as payments to students or to provide additional support to needy students.

This section will not apply:

- 1. In any year when the Alamo Colleges does not receive the Title III Hispanic Serving institution designation.
- 2. If federal Title IV regulations are changed to prohibit the waiver.

Deposits to Multi-Year Fund:

- 1. Will be calculated annually.
- 2. Will vary based on the federal allocation.

#### **Institutional and Financial Assistance Information**

The Alamo College District shall follow applicable information dissemination and counseling requirements found at 20 U.S.C. 1092 including those concerning the following areas:

- 1. Financial assistance programs.
- 2. Exit counseling for borrowers.

# F.2.4 (Policy) Student Financial Aid

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- 3. Financial assistance information personnel.
- 4. Athletically related student aid.
- 5. Campus security policy and campus crime statistics
- 6. Institutional policies and sanctions related to copyright infringement.

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Man's and women's intercollegiate athletics.
U.S.C. 1092

# **Educational Lending**

There shall be no conflict of interest with the responsibilities of an office, employee, or agent of the Alamo Colleges, including the provisions of Texas Association of Community Colleges described in 20 U.S.C 1094(e) regarding:

- 1. A ban on revenue-sharing arrangements;
- 2. A ban on gifts from lenders, guarantors, or servicers of educational loans;
- 3. A prohibition on certain interaction with borrowers;
- 4. A prohibition on offers of funds for private loans;
- 5. A ban on lender assistance with call center or financial aid office staffing; and
- 6. A prohibition on advisory board compensation.

The District shall publish the code of conduct prominently on the District's Web site. The District shall also administer and enforce the code of conduct by, at a minimum, requiring that all of the District's officers, employees, and agents are informed annually of the provisions of the code of conduct.

20 U.S.C. 1094(a)(25) (e)