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Reviewed: 9/2024	 <hr/> Tina Vanburen, DNP, MSN, RN, CNS Director, School of Nursing	Office of Financial Aid and Administration Committee

Purpose

The purpose of this policy is to:

1. Ensure that JFMSON maintains transparency and fairness in all student loan practices.
2. Eliminate any real or perceived conflicts of interest between the school and education loan lenders.
3. Comply fully with USDE Title IV regulations and other applicable federal and state laws governing educational loans.

Scope

This policy applies to all officers, employees, and agents of JFMSON involved in any aspect of financial aid administration or educational loan processing. It is applicable to all students enrolled in JFMSON who participate in federal, state, and private student loan programs.

Definitions

Revenue-Sharing Arrangement: An agreement between an educational institution and a lender in which the lender provides financial benefits to the institution in exchange for recommending the lender to borrowers.

Nominal Value: Defined as any item having a monetary value of no more than \$10 or as determined by applicable federal regulations.

Lender: Any entity engaged in the business of making or servicing educational loans for students.

Guarantor: An organization that insures or guarantees student loans made by lenders.



Policy

The Joseph F. McCloskey School of Nursing (JFMSON) is committed to providing students and their families with unbiased, accurate, and comprehensive information regarding student borrowing options. To ensure the highest ethical standards and to avoid any real or perceived conflicts of interest, JFMSON strictly adheres to the U.S. Department of Education (USDE) Title IV regulations. This policy outlines the institution's guidelines regarding interactions with lenders, borrowers, and loan servicers to promote transparency and fairness in all student lending practices.

Procedure

JFMSON prohibits its officers, employees, and agents involved in educational loan processing from engaging in the following actions:

- **Revenue-Sharing Agreements**
JFMSON shall not enter into revenue-sharing arrangements with any lender. The school will not receive any financial or other benefits from lenders in exchange for directing students to that lender.
- **Prohibition on Gifts**
No JFMSON officer, employee, or agent involved in student loan administration may solicit or accept any gift from a lender, guarantor, or loan servicer. This prohibition includes gifts of more than a nominal value, as defined by applicable federal regulations.
- **Contracting Arrangements**
JFMSON officers, employees, or agents involved in financial aid administration or educational loan processing may not accept fees, payments, or any other form of compensation from lenders or their affiliates in exchange for providing consulting services or contracts related to educational loans.
- **Advisory Board Compensation**
JFMSON personnel may not receive anything of value in exchange for serving on an advisory board or committee established by a lender, guarantor, or loan servicer. Reimbursement for reasonable expenses incurred while serving on such boards is permitted as long as it complies with federal guidelines.
- **Lender Choice for Borrowers**
JFMSON will not assign or recommend any specific lender to a first-time borrower. Students and their families have the right to select any lender they choose for funding their education.
- **Loan Certification and Processing**
JFMSON will not refuse or delay the certification of any student loan based on the borrower's choice of lender. Students retain full discretion in selecting their loan provider.
Prohibition on Private Loan Arrangements
JFMSON does not engage in agreements with lenders for private education loans in exchange for federal loan processing or preferred lender status.



- **Prohibition on Lender Assistance for Financial Aid Office**
JFMSON will not request or accept staffing assistance from any lender for the financial aid office or any administrative function of the institution. The integrity of JFMSON's financial aid processes will be maintained without outside influence.
- **Permissible Assistance**
The following types of assistance may be accepted from lenders:
 - Professional development training for financial aid administrators.
 - Financial literacy and debt management materials provided to students, as long as the involvement of the lender in preparing these materials is clearly disclosed.

Responsibilities

The Director of Financial Aid is responsible for ensuring compliance with this policy. All personnel involved in the administration of educational loans must review and adhere to these guidelines to prevent any conflicts of interest.

Enforcement and Sanctions

Violations of this policy by JFMSON personnel may result in disciplinary action, up to and including termination of employment. Non-compliance with federal regulations may also result in the loss of the school's eligibility to participate in federal financial aid programs.

References

- **Code of Federal Regulations (CFR) 601.21**
- **U.S. Department of Education (USDE) Title IV Regulations**

Review and Approval

This policy is reviewed annually by the Office of Financial Aid and Administration Committee.