

MICHIGAN STATE UNIVERSITY  
CONFLICT OF INTEREST POLICY AND CODE OF CONDUCT  
FOR FINANCIAL AID PROFESSIONALS

**I. Purpose**

The purpose of this Policy is to prohibit conflicts of interest in situations involving student financial aid and to establish standards of conduct for employees with responsibility for student financial aid.

**II. Applicability**

This Policy applies to all employees who work in the Office of Financial Aid and all other University employees who have responsibilities related to education loans or other forms of student financial aid.<sup>1</sup>

**III. Code of Conduct**

**A. Conflicts of Interest**

1. A conflict of interest exists when an employee's financial interests or other opportunities for personal benefit may compromise, or reasonably appear to compromise, the independence of judgment with which the employee performs his/her responsibilities at the University.
2. No employee shall have a conflict of interest with respect to any financial aid award for which the employee has responsibility.
3. No employee may process any transaction related to his/her own personal financial aid eligibility, enrollment, or billing, or that of a relative, personal friend, or colleague within the office. A relative is an individual with whom an employee has a relationship by blood, marriage, adoption, domestic partnership, or other personal relationship in which objectivity might be impaired. Employees must refer transactions related to their own financial aid, or those of relatives, personal friends or colleagues, to an Assistant or Associate Director for processing.

**B. Gifts**

1. A gift is any gratuity, favor, discount, entertainment, hospitality, loan, or other item having a monetary value of more than a de minimus amount. The term includes a gift of services, transportation, lodging, or meals, whether provided in kind, by purchase of a ticket, payment in advance, or reimbursement after the expense has been incurred.
2. No employee may accept any gift from a lender, guarantor, or servicer of education loans. Employees may not accept any gift from a student for whom they process any transaction related to the student's financial aid eligibility, enrollment, or billing, or from a family member of such a student. A gift to a family member of an employee or to any other individual based on that individual's relationship with the employee shall be considered a gift to the employee if the gift is given with the knowledge and acquiescence of the

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<sup>1</sup> Agents of the University with responsibility for education loans or other student financial aid are also expected to abide by the terms of this Policy.

employee and the employee has reason to believe the gift was given because of the employee's position at the University.

3. Any gift with more than a minimal value may not be accepted. If it is not possible to refuse or return a gift, it must be submitted to a University unit (e.g., Surplus) which accepts such items for sale or otherwise used for a University purpose or to benefit the University, rather than for the employee's personal benefit.
4. Token awards from professional associations (state, regional, or national) that recognize professional milestones or extraordinary service to parents and students, or scholarships for conference attendance or other professional development opportunities, may be accepted.
5. Gifts of consumables (e.g., fruit, candy, cookies) should be shared with others in the office.
6. Letters and cards of appreciation may be accepted, displayed, and placed in the employee's personnel file.

### **C. Reimbursement of Expenses**

Expenses incurred while attending professional association meetings, or conferences must be paid by the University.<sup>2</sup> Entertainment expenses such as concert or sports tickets or greens fees may not be accepted. Employees are expected to personally pay for such expenses or request reimbursement from the University in accordance with University policy.

### **D. Meals**

Employees may occasionally need to share meals with employees of lenders, guaranty agencies, the State of Michigan, or other colleges or universities in the course of business. Meals offered as a part of meetings, conferences, or other events may be accepted if all participants in the meeting or event are offered the meals or if the meals are included as a part of a registration fee.

## **IV. Policy Violations**

Violations of this Policy may result in disciplinary action, up to and including dismissal.

## **V. History**

This Policy was issued by the Office of the President on February 1, 2009, and revised March 25, 2014.

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Signature

Date

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<sup>2</sup> Expenses incurred on behalf of the MSU College of Law should be reimbursed to the appropriate University office by the MSU College of Law.