

**Student Loan Code of Conduct**

Stetson University adopts the following Student Loan Code of Conduct to comply with the 2008 Higher Education Opportunity Act, to serve as the guiding principles in ensuring the integrity of the student financial aid process. All Stetson University employees who have responsibilities with respect to educational loans or other forms of student financial aid, are required to comply with this Student Loan Code of Conduct. Stetson University does not currently recommend specific lenders, nor does it participate in any preferred lender arrangements.

**Revenue Sharing**

Stetson University does not have, nor will it enter any agreement with any lender that provides or issues loans that are made, insured, or guaranteed pursuant to federal student aid programs established under Title IV of the Higher Education Act of 1965, as amended (‘Lender’), in which the lender pays a fee or provides other material benefits, including revenue or profit sharing to Stetson University, or an officer, employee or agent of the University.

**Gifts**

Employees, officers or agents who are employed in the Office of Student Financial Planning or who otherwise has responsibilities with respect to financial aid will not solicit or accept any gift or other material benefit having a monetary value of more than a *de minimus* amount from a Lender. A gift or material benefit means any gratuity, favor, discount, entertainment, hospitality, loan, service, transportation, lodging, or meals, whether provided in kind, by purchase of a ticket, payment in advance, or reimbursement after the expense has been incurred. Gifts to family members of a Stetson University’s Office of Student Financial Planning employee or who otherwise has responsibilities with respect to financial aid are considered to be a gift to the employee if the gift is given with the knowledge and consent of the employee and there is reason to believe the gift was given because of the official position of the employee.

A gift or material benefit does not include any of the following items or services listed below:

* Standard material, activities, or programs on issues related to a loan, default aversion, default prevention, or financial literacy, such as a brochure, a workshop, or training
* Food, refreshments, training, or informational material furnished to a Stetson University officer, or employee, or to an agent of the University, as an integral part of a training session that is designed to improve the service of a lender, guarantor, or a servicer of education loans to the institution, is such training contributes to the professional development of the officer, employee or agent.
* Favorable terms, conditions, and borrower benefits on an education loan provided to a student employed by the University if such terms, conditions, or benefits are comparable to those provided to all students at the University.
* Entrance and exit counseling services provided to students as long as:
  + The University staff are in control of the counseling (whether in person or via electronic capabilities; and
  + Such counseling does not promote the products or services of any specific lender.
* Philanthropic contributions to Stetson University from a lender, servicer, or guarantor of education loans that are unrelated to education loans or any contribution from any lender, guarantor, or servicer that is not made in exchange for any advantage related to education loans.
* State education grants, scholarships, or financial aid funds administered by or on behalf of a State.

**Contracting Arrangements**

An employee, officer or agent of the Office of Student Financial Planning or who otherwise has responsibilities with respect to financial aid shall not accept from any lender or affiliate of any lender any fee, payment, or other financial benefit (including the opportunity to purchase stock) as compensation for any type of consulting arrangement or other contract to provide services to a lender or on behalf of a lender relating to education loans.

**Private Loan Certification**

Stetson University will not assign a borrower’s private student loan to a particular lender; all decisions will be made by the borrower in his/her independent review of borrower benefits and lender services. Stetson University will not refuse to certify, or delay certification of, any loan based on the borrower’s selection of a particular lender or guaranty agency. All loans are processed without regard to lender or mode of transmission (i.e., electronic or paper).

**Preferred Lender Status**

Stetson University participates in the William D. Ford Federal Direct Loan Program which provides student and parent loans through the U.S. Department of Education. If in the event the University decides to promulgate a list or lists of preferred or recommended lenders for student private education loans (‘Preferred Lender List’), Stetson University will prepare the Preferred Lender List according to the best interest of the University’s students and parents, without regard to the University’s financial interests. Stetson University’s use of the preferred lender list will not deny or impede a student borrower’s choice of a lender, or result in an unnecessary delay in the certification of a Title IV loan for a borrower who chooses a lender not on the list. In addition the preferred lender list will:

* Disclose detailed information about the terms and conditions of the loans and conditions of the loans offered by preferred lenders, as required under section 153 (a)(2)(A) of the Higher Education Act;
* Disclose why it entered into an arrangement with each lender, particularly with respect to terms and conditions or provisions favorable to the borrower;
* Disclose that students and families of students who do not have to borrow from a lender on the preferred lender list;
* Ensure that the list contains at least three unaffiliated lenders if the institution has a preferred lender list for private education loans the list must contain at least two unaffiliated lenders from those loans. The list must specifically indicate whether a lender is or is not an affiliate of each other lender on the list. If a lender is an affiliate of another lender the institution must describe that affiliation;
* Prominently disclose the method and criteria used in selecting the lenders to ensure that the lenders are selected on the basis of the best interest of the borrowers.

The University will review any Preferred Lender List(s) on an annual basis to ensure that the information appearing on the list is accurate and that any website links are still available.

**Loan Referral Policy**

Stetson University will not request or accept from any lender any offer of funds intended to be used for private educational loans (as defined in section 140 of the Truth in Lending Act), for students in exchange for Stetson University promising to refer student applications for federal Title IV loans to the lender, or for the promise that such referrals be for a certain specified federal loan volume, or for the promise that such referrals be made pursuant to a preferred lender arrangement.

**Staffing Assistance**

Stetson University does not and will not request or accept any assistance with call center staffing or financial aid office staffing for a lender, except where permitted by law for professional development and training of financial aid administrators or on a short-term non-recurring basis during emergencies, including State-declared or federally declared disasters, or with permission of the Secretary of United States Department of Education. The University may provide certain materials to borrowers, including educational counseling materials, financial literacy materials, or debt management materials, which were produced by lenders, provided that such materials clearly identify the lender that assisted in preparing or providing such materials.

**Advisory Board Compensation**

Employees, officers or agents who are employed by the Office of Student Financial Planning or who otherwise has responsibilities with respect to financial aid will not receive anything of value for serving as a member or participant of an advisory board, commission, or group established by a lender, guarantor of a lender, or a group of lenders or guarantors. The employee, officer or agent may receive reimbursement for reasonable expenses incurred in serving on such advisory board, commission or group.

Questions regarding this Student Loan Code of Conduct should be directed to the Office of Student Financial Planning.