



Student Lending Code of Conduct

A. Statement of Commitment

The College of Law does not currently recommend specific lenders, nor does it participate in any preferred lender arrangements. However, in keeping with Stetson University College of Law's Core Values, which includes the College's commitment to professionalism, ethics, and integrity, the College of Law recognizes that it must carry out its role in the student financial aid process according to high standards of professionalism and ethics. To ensure the integrity of the student financial aid process, the College of Law has established this Student Lending Code of Conduct and will take all reasonable steps to adhere to the guidelines set forth below.

B. Specific Obligations

The following list has been developed to detail certain practices not permitted by the College of Law in the administration of financial aid under Title IV.

1. The College of Law Will Not Enter into Any Revenue Sharing Arrangement with Any Lender

The College of Law 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 the College of Law, or an officer, employee, or agent of the College of Law.

2. College of Law Personnel Will Not Accept Improper Benefits

- a. No College of Law officer, employee, or agent who is employed in the Office of Student Financial Planning or who otherwise has responsibilities with respect to financial aid will 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.
- b. A gift or material benefit does not include any of the following items or services listed below. But while the above items do not legally constitute a gift or material benefit, these matters should be reported to the Dean or the

Deans designee for an assessment under the College of Law Conflict of Interest policy:

1. 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.
 2. Food, refreshments, training, or informational material furnished to a College of Law officer or employee, or to an agent of the College, as an integral part of a training session that is designed to improve the service of a lender, guarantor, or servicer of education loans to the institution, if such training contributes to the professional development of the officer, employee, or agent.
 3. Favorable terms, conditions, and borrower benefits on an education loan provided to a student employed by the College of Law if such terms, conditions, or benefits are comparable to those provided to all students at the College of Law.
 4. Entrance and exit counseling services provided to students, as long as—
 - a) the College's staff are in control of the counseling (whether in person or via electronic capabilities); and
 - b) such counseling does not promote the products or services of any specific lender.
 5. Philanthropic contributions to the College of Law 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.
 6. State education grants, scholarships, or financial aid funds administered by or on behalf of a State.
- c. With the advance approval of the Dean or the Dean's designee, College of Law officers, employees, or agents may:
1. conduct non-College-related business with any Lender and, subject to state law, receive value in connection with such non-College-related business, provided that such value is not intended to influence the officer, employee, or agent with regard to the student loan activities of the Lender at the College of Law;
 2. conduct College of Law business with any Lender and, subject to state law, receive value on behalf of the College of Law that is not related to the student loan activities of the Lender;

3. attend conferences and meetings of tax-exempt organizations that are funded or sponsored by more than one entity and, subject to state law, receive materials, refreshments, and other things of like value provided at such professional conferences and meetings; and
4. hold membership in, serve on the board of, or participate in the activities of any tax-exempt organization and, subject to state law, receive travel reimbursements and other things of value from such tax-exempt organization for such activities.

No family member of an officer, employee or agent of the College of Law who is employed in the Office of Student Financial Planning or who otherwise has responsibilities with respect to financial aid may solicit or accept any gift or material benefit from a Lender if (1) the gift is given with the knowledge and acquiescence of the officer, employee, or agent; and (2) the officer, employee, or agent has reason to believe the gift was given because of the position held by the officer, employee, or agent.

3. College of Law Personnel Will Not Enter into Improper Contractual Relationships with Lenders

No officer, employee, or agent, or agent of the College of Law who is employed in the Office of Student Financial Planning or who otherwise has responsibilities with respect to financial aid will accept any compensation from any Lender or any Lender's affiliate for any type of consulting arrangement or other contract to provide services on behalf of the Lender. Such compensation includes fees, cash payments, or other financial benefits (including the opportunity to purchase stock). However, with advance approval by the Dean, the following activities regarding paid or unpaid service on a board of directors of a Lender are permitted:

- a. A College of Law officer or employee who is not employed in the College's Office of Student Financial Planning office and who does not otherwise have responsibilities with respect to education loans, or an agent who does not have responsibilities with respect to education loans, may perform paid or unpaid service on a board of directors of a lender, guarantor, or servicer of education loans; or
- b. A College of Law officer or employee who is not employed in the College's Office of Financial Aid but who has responsibility with respect to education loans as a result of a position held at the College of Law, or an agent who has responsibility with respect to education loans, may, perform paid or unpaid service on a board of directors of a lender, guarantor, or servicer of education loans, in accordance with the College of Law's Conflict of Interest policy requiring officers, employees, or agents to recuse themselves from participating in any decision of the board regarding education loans at the College.

4. The College of Law Will Not Improperly Steer Borrowers to a Lender

The College will not assign a first-time borrower's loan to a particular Lender, through award packaging or other methods. The College will not refuse to certify or unreasonably delay certification of any loan based on the borrower's selection of a particular Lender or guaranty agency. This section does not preclude the College of Law from requiring all borrowers to use the Federal Direct Loan program.

5. The College of Law Will Not Enter Into Improper Contractual Relationships with Lenders

The College of Law does not and will not request or accept funds from a Lender that are intended to be used for Private Educational Loans (i.e., non-Title IV loans) for students in exchange for the College of Law's promise to refer student applications for Title IV loans to the Lender, or for the promise that such referrals be for a certain specified Title IV loan volume, or for the promise that such referrals be made pursuant to a preferred lender arrangement.

6. The College of Law Will Not Accept Improper Staffing Assistance

The College of Law does not and will not request or accept any assistance with call center staffing or financial aid office staffing from 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 the permission of the Secretary of United States Department of Education. The College of Law 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.

7. College of Law Personnel Will Not Be Compensated for Service on Lender Advisory Boards

No College of Law officer, employee, or agent who is employed in the Office of Student Financial Planning or who otherwise has responsibilities with respect to financial aid will 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. However, with advance approval of the Dean, College of Law personnel may receive reimbursement for reasonable expenses incurred in serving on such advisory board, commission, or group.

8. The College of Law Will Use Preferred Lender Lists Properly

The College of Law does not currently recommend specific lenders. If the College decides in the future to promulgate a list or lists of preferred or recommended Lenders for student loans ("Preferred Lender List"), the College of Law will prepare the Preferred Lender List according to the best interests of the College's students and parents, without regard to the College of Law's

financial interests. The College of Law'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:

- a. 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;
- b. disclose why it entered into an arrangement with each lender, particularly with respect to terms and conditions or provisions favorable to the borrower;
- c. disclose that students and families of students do not have to borrow from a lender on the Preferred Lender List;
- d. 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 for 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;
- e. prominently disclose the method and criteria used in selecting the lenders to ensure that the lenders to ensure that the lenders are selected on the basis of the best interests of the borrowers.

Questions on this Student Lending Code of Conduct can be directed to the Office of Admissions and Student Financial Planning.

Administrative policy adopted November 11, 2009, updated December 6, 2012.