**Student Loan Code of Conduct**

Hardin-Simmons University (HSU) participates in the William D. Ford Federal Direct Loan Program which includes the Direct Subsidized and Direct Unsubsidized Student Loans, the Direct Graduate PLUS Loan, and the Direct Parent PLUS Loan. In some cases, Private Student Loans are needed to supplement the cost of education. HSU encourages students to exhaust all other methods of financing their education before applying for Private Loans. To comply with the Higher Education Opportunity Act (HEOA), HSU adopts the following Student Loan Code of Conduct. It serves as the formal guiding principles in ensuring the integrity of the student aid process and ethical conduct to HSU employees, in regard to student loan practices.

1. **Revenue Sharing** - HSU and its employees will not enter into any type of revenue-sharing arrangement with any lender, guarantor or servicer. HSU does not provide students a preferred lender list from which to select a lender for a private student loan. All loans are processed without regard to lender or mode of transmission (i.e., electronic or paper). HSU will neither recommend a private loan lender nor accept material benefits including revenue or profit sharing to the institution, an officer, or an employee of the institution or an agent.

2. **Gifts** - Employees of the Office of Student Financial Aid are prohibited from soliciting or accepting any gift from a lender, guarantor, or servicer of education loans.

a. Gifts include any gratuity, favor, discount, entertainment, hospitality, loan or other items. This includes a gift of services, transportation, lodging, or meals, whether provided inkind, by purchase of a ticket, payment in advance or reimbursement after the expense has incurred.

b. Gifts to family members of an HSU employee 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 that employee.

3. **Contracting Arrangements** - Employees of the Office of Student Financial Aid shall not accept from any lender or its affiliate, any fee, payment or other financial benefit (including opportunity to purchase stock) as compensation for any consulting arrangement or other contract to provide services to a lender or on behalf of a lender relating to education loans.

4. **Preferred Lender Status** - HSU participates in the William D. Ford Federal Direct Loan Program which provides student and parent loans through the U.S. Department of Education. Lenders in the private student loan industry will not be given a preferred status.

5. **Private Loan Certification** - HSU 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. HSU will not refuse to certify, or delay certification of any loan based on the borrower’s selection of a particular lender or guarantee agency.

6. **Staffing Assistance** - HSU will not request or accept from any lender, guarantor, or servicer of student loans any assistance with call center staffing or financial aid office staffing.

7. **Advisory Board Compensation** - Employees of the Office of Student Financial Aid who serve on an advisory board, commission, or group established by a lender, guarantor, or group of

lenders or guarantors, are prohibited from receiving anything of value from the lender, guarantor, or group of lenders or guarantors, except that the employee may be reimbursed for reasonable expenses incurred in serving on such advisory board, commission, or group.

8. Sanctions Violations of this code will be dealt with in accordance with applicable HSU policies and procedures, which may include disciplinary actions up to and including termination of employment by the university.