

DePauw University Financial Aid Office

Student Educational Loan Code of Conduct

Institutions participating in the federal student loan program are required under the 2008 Higher Education Opportunity Act (HEOA) to develop, publicize and enforce a Code of Conduct with respect to student loans.

In compliance with the HEOA, DePauw University adopts the following principles which will serve as the Educational Loan Code of Conduct. To prohibit a conflict of interest with respect to student loans, it directs all employees, officers or agents who have responsibilities pertaining to educational loans to adhere to the following. The Code of Conduct will be distributed and published on an annual basis as is required by law.

Since DePauw University has no lender arrangement with any private educational loan lenders, it does not maintain a preferred lender list.

- DePauw University and its employees, officers or agents are prohibited from entering into any revenue-sharing arrangements with any lender.
 - For purposes of this document, revenue-sharing means any arrangement between an institution and a lender in which a lender provides or issues a private educational loan to a student or family of the student and the institution recommends the lender or the loan products and in exchange, the lender pays a fee or provides other material benefits to the institution or its employees in connection to these loans.

- Employees, officers or agents of the University who have responsibilities with respect to educational loans are prohibited from soliciting or accepting any gift from a lender, guarantor, or servicer of educational loans over a nominal value.
 - For these purposes, gifts are defined as a gratuity, favor, discount, entertainment, hospitality, loan, or any other item of more than a nominal value. It 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.
 - Gifts would not include standard materials, activities or programs related to loan issues, default aversion or prevention or financial literacy such as brochures, workshops or training; food or refreshments, training or informational materials designed to improve the service of the lender, guarantor or servicer provided that the training contributes to the professional development of the institution's employees; favorable loan benefits for an educational loan to a student employed by the institution provided they are offered to all students of the institution; services for Entrance and Exit Counseling provided that the institution controls the counseling and it does not promote the lender's products; lender philanthropic contributions to the institution that are not linked to loan volume.

- Employees in the Financial Aid Office and other employees who have educational loan responsibilities are prohibited from accepting any fee, payment, or other financial benefit from any

lender or affiliate of any lender (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 educational loans.

- DePauw University participates in the Federal Direct Loan Program. For other educational loans, the University will not, through the financial aid awarding or by other means, assign a first-time borrower's loan to a particular lender or refuse to certify, or delay certification of, any loan based on the borrower's selection of a particular lender or guaranty agency.
- DePauw University will not request or accept from any lender any offer of loan funds to be used for private educational loans (including funds for an opportunity pool loan) in exchange for the institution providing concessions or promises to a lender regarding: a specified number of private educational loans, a specified volume of loans or a preferred lender arrangement for the loans.
 - An opportunity pool means a private educational loan made by a lender to a student or the student's family that involves payment by the institution to the lender extending credit to the student or family of the student.
- DePauw University will not accept any staffing assistance for the financial aid office from any lender unless services are on a nonrecurring basis such as during an emergency or disaster event. Concessions would include financial aid staff professional development, providing counseling, financial literacy, or debt management materials to borrowers as long as such materials disclose to borrowers the name of the lender that provided or assisted in the preparation of the materials.
- Employees of the University's financial aid office, other employees, officers or agents who have responsibilities related to educational loans, and who serve on an advisory board, commission, or group established by a lender, guarantor, or group of lenders or guarantors, are prohibited from receiving compensation from the lender, guarantor, or group of lenders or guarantors. The exception is that reimbursement may be made for reasonable expenses incurred in serving on such advisory board, commission, or group.