Hofstra University Student Loan Code of Conduct for Financial Aid Administrators

In addition to the University's general rules set forth in the University's Conflict of Interest and Commitment Policy, the following provisions constitute the University's Student Loan Code of Conduct, as required by the Higher Education Opportunity Act of 2008 (HEOA). The University also complies with the New York State Student Lending Accountability, Transparency, and Enforcement Act.

The following conduct is prohibited:

1. Participating in a revenue-sharing arrangement with any lender. A revenue-sharing arrangement is any arrangement under which a lender makes private education loans to students attending the University (or to their families), the University recommends the lender or the loan products of the lender and, in exchange, the lender pays a fee or provides other material benefits, including revenue or profit-sharing, to the University or to its officers, employees, or agents;

2. Receiving gifts from a lender, guaranty agency or loan servicer. No officer or employee may solicit or accept any gift from a lender, guarantor, or servicer of education loans. A "gift" means any gratuity, favor, discount, entertainment, hospitality, loan, or other item having monetary value of more than a de minimis 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 expenses were incurred, and includes any computer hardware for which the recipient pays below-market prices.

   A gift does *not* include (1) standard materials, activities, or programs on issues relating to a loan, default aversion, or financial literacy, such as a brochure, workshop or training; (2) food, refreshments, training, or informational material provided as part of a training session designed to improve the service of a lender, guarantor, or servicer of education loans if the training contributes to the professional development of University officers, employees or agents; (3) favorable terms and benefits on an education loan provided to a student employed by the University, if those terms and benefits are comparable to those provided to all students at the University; (4) entrance and exit counseling, provided that University staff are in control of the counseling and the counseling does not promote the products or services of any specific lender; (5) philanthropic contributions from a lender, guarantor, or servicer that are unrelated to education loans and; (6) State education grants, scholarships, or financial aid funds administered by or on behalf of a State;

3. Accepting from a lender, or an affiliate of any lender, any fee, payment, or other financial benefit as compensation for any type of consulting arrangement or contract to provide services to or on behalf of a lender relating to education loans;

4. Steering borrowers to particular lenders or delaying loan certifications based on the borrower's selection of a particular lender or guaranty agency. For any first-