

Institutional Code of Conduct for Education Loans

Hodges University participates in the William D. Ford Federal Direct Loan Program which includes the Direct Subsidized and Direct Unsubsidized Student Loans, the Direct Graduate PLUS Loans, and the Direct Parent PLUS Loans. In some cases, Private Student Loans are needed to supplement the cost of education. Hodges University recommends that students exhaust all other methods of financing their education prior to applying for Private Loans. In compliance with the 2008 Higher Education Opportunity Act (enacted August 14, 2008), Hodges University adopts the following Institutional Code of Conduct for Education Loans to serve as the formal guiding principles in insuring the integrity of the student aid process and the ethical conduct of Hodges University employees in regards to student loan practices.

Revenue Sharing

The term “revenue-sharing arrangement” means an arrangement between an institution and a lender in which – (i) a lender provides or issues a loan that is made, insured, or guaranteed to students under the Higher Education Act attending the institution or to the families of such students; and (ii) the institution 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 institution, an officer, or employee of the institution. Hodges University and its employees will not enter into any type of revenue-sharing arrangement with any lender, guarantor, or servicer. Hodges University 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). Hodges University 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.

Gifts

Employees of the Office of Student Financial Services are prohibited from soliciting or accepting any gift from a lender, guarantor, or servicer of education loans.

- Gifts include any gratuity, favor, discount, entertainment, hospitality, loan, or other item. This includes a gift of services, transportation, lodging, or meals, whether provided in kind, by purchase of a ticket, payment in advance, or reimbursement after such an expense has incurred.
- Gifts to family members of a Hodges University employee are considered to be a gift to the employee if the gift can reasonably be construed as being 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.

Contracting Arrangement

The Office of Student Financial Services employees shall not accept from any lender or affiliate of any lender 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.

Preferred Lender Status

Hodges University 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. Hodges University will not produce a preferred lender list that gives any lender an advantage in securing business from Hodges University students.

Private Loan Certification

Hodges 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. Hodges 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.

Opportunity Pool Loan

Hodges University will not request or accept from any lender any offer of funds to be used for private education loans (defined in section 140 of the Truth in Lending Act) including funds for an opportunity pool loan in exchange for Hodges University providing concessions or promises regarding providing the lender with a specified number of loans made, insured, or guaranteed; a specified loan volume of such loans; or a preferred lender arrangement for such loans.

Staffing Assistance

Hodges University will not request or accept from any lender, guarantor, or servicer of student loans any assistance with call center staffing or financial aid office (or Office of Student Financial Services) staffing.

Advisory Board Compensation

The Office of Student Financial Services employees 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.