

Code of Conduct

This Code of Conduct applies to all staff members in the Office of Financial Aid and to any other individuals with responsibilities for Stanford University related to Title IV or private education loans.

The following conduct is prohibited:

- Conflicts of interest with the responsibilities of a Stanford University officer, employee, or agent with respect to education loans.
- Revenue-sharing arrangements with any lender. This is defined as any arrangement between Stanford University and a lender in which the lender provides an education loan to students or families and pays a fee or provides other material benefits (including a share of the revenue or profits) to Stanford University, its officers, employees, or agents; and in exchange, Stanford University recommends the lender or loan products of the lender to Stanford University students or families.
- Soliciting or accepting gifts from any lender, guaranty agency, or loan servicer of Title IV or private education loans. “Gift” is defined as any gratuity, favor, discount, entertainment, hospitality, loan, or other item having a monetary value of more than a de minimus amount; and 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. The following are not considered “gifts”:
 - Brochures, workshops, or other standard training or training materials on issues related to a loan, default aversion, default prevention, or financial literacy.
 - Food, refreshments, training, or informational materials provided to Stanford University, its officers, employees, or agents as an integral part of a training session, as long as such training is designed to improve the service of the lender, guaranty agency, or loan servicer of Title IV or private education loans to Stanford University and contributes to the professional development of those individuals attending the training.
 - Favorable terms, conditions, and borrower benefits on a Title IV or private education loan provided to a student employed by Stanford University if such terms, conditions, or benefits are comparable to those provided to all students of Stanford University.
 - Entrance and exit counseling services, as long as Stanford University staff are in control of such counseling and the counseling does not promote the products or services of a specific lender.
 - Philanthropic contributions to Stanford University from a lender, guaranty agency, or servicer of Title IV or private education loans, as long as such contributions are unrelated to Title IV or private education loans.
 - Any contribution from a lender, guaranty agency, or servicer that is not made in exchange for any advantage related to Title IV or private education loans.
 - State education grants, scholarships, or financial aid funds administered by or on behalf of the state.

Gifts to a family member of a Stanford University officer, employee, or agent, or to any individual based on the individual's relationship to a Stanford University officer,

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employee, or agent, is considered a gift to the Stanford University member if the gift is given with the knowledge and acquiescence of the member and the member has reason to believe the gift was given because of their Stanford University position.

- Contract arrangements whereby any employee or agent of Stanford University's Financial Aid and Scholarships Office, or other employees or agents with responsibilities related to Title IV or private education loans, accepts from a lender or lender's affiliate any fee, payment, or other financial benefit as compensation for any type of consulting arrangement or other contract to provide services to or on behalf of a lender relating to Title IV or private education loans.
- Steering or assigning first-time borrowers to particular lenders, or refusing to certify or delaying loan certification based on the borrower's selection of a particular lender or guaranty agency.
- Requesting or accepting offers of funds for private loans. This includes any offer of funds for private education loans (including funds for an opportunity pool loan) to students in exchange for Stanford University providing concessions or promises regarding providing the lender with a specific number of Title IV or private education loans, a specified volume of such loans, or a preferred lender arrangement for such loans.
- Requesting or accepting from a lender any assistance with call center staffing or financial aid office staffing. However, Stanford University may request or accept assistance from a lender related to:
 - Professional development training for financial aid administrators.
 - Providing educational counseling materials, financial literacy materials, or debt management materials to borrowers, provided that such materials disclose to borrowers the identification of any lender that assisted in preparing or providing such materials.
 - Staffing services on short-term, nonrecurring basis to assist Stanford University with financial aid related functions during emergencies, including state declared or federally declared natural disasters, and certain other localized disasters and emergencies.
- While serving on an advisory board, commission, or group established by a lender, guarantor, or group of guarantors, receiving anything of value from the lender, guarantor, or group of lenders or guarantors. Reimbursement for reasonable expenses incurred while serving in such capacity is permitted.
- Awarding and/or processing of financial aid or scholarship funds to oneself or family members(s).