



## **Code of Conduct Relating to Federal Family Education Loan Program (FFELP)**

This Code is established and published in an effort to ensure there are no conflicts of interest with responsibilities of agents affiliated in any way with loan counseling, loan processing, or other loan-related functions across the entire campus.

The PNW CC Financial Aid Office does not have a 'preferred lender list'. Students are free to select a lender of their choice and can use either a US Department of Education FFELP Listing or ELM Resources federally approved listing to obtain names and contact information of possible lenders.

Students are encouraged to contact several lenders and choose a lender that meets the students' satisfaction for loan servicing. When making this choice, students are encouraged to rate lenders on things like repayment terms and origination fees.

### **CODE OF CONDUCT:**

1. PNWCC strictly prohibits any member of the college from receiving any revenue-sharing arrangement with any lender under any circumstances. Any member of the college workforce and individuals serving in an advisory or board capacity who believes he/she may have a conflict of interest should identify such to the President's Office immediately.
2. Students are encouraged to refrain from using private loan (Alternative Loan) products. In cases where the student feels he/she must use such loan products, the same care in comparison should be used on the part of the student in finding the private loan agency that best meets that student's satisfaction for loan servicing and borrower benefits. PNWCC strictly prohibits offers of funds for private loans.
3. PNWCC employees will not receive gifts from lenders, guarantors, or servicers in exchange for promotion or channeling of student loan volume to that agency. Only objects of nominal value can be accepted to the extent allowable by law without violating this code. This ban does not include the following:
  - a. Brochures or training material related to default aversion or financial literacy
  - b. Food, training, or information materials that contributes to the professional development of individuals attending the training
  - c. Entrance and exit counseling that does not promote the services of a specific lender
  - d. Philanthropic contributions from a lender, guarantor or servicer unrelated to education loans
  - e. State education, grants, scholarships or financial aid funds administered by or on behalf of the state

4. PNWCC prohibits consulting or other contracting arrangements with lenders, guarantors, or servicers. Such entities may only provide services allowed by law, such as loan entrance or exit materials.
5. PNWCC prohibits employees from directing borrowers to particular lenders or assigning a lender to a first-time borrower under the FFELP Loan Program.
6. PNWCC prohibits refusal to certify or delay certification of a loan based upon choice of lender.
7. PNWCC prohibits staffing assistance to be offered or obtained from a lender, servicer, or guarantor.
8. PNWCC prohibits receipt of compensation by any employee for advisory board services to lenders, guarantors, or servicers. If any employee is asked to serve on such a board, the employee must identify the nature and name of the board to the President's Office before agreeing to serve in such a capacity.