Front Range Community College Financial Aid Office Code of Conduct

Front Range Community College (FRCC) is committed to providing the best possible customer service to our students and their families. Keeping within the federal requirements, it is our goal to provide information and advice, determined solely by consideration of the best interests of our students and their parents or guardians.

To ensure students and their families continue receiving sound and impartial advice from the financial aid personnel, and to avoid the potential for, or appearance of, conflicts of interest regarding student loans, FRCC shall abide by this Code of Conduct in its relationships with lenders, guarantors and servicers of education loans.

It is the intention of FRCC that this Code of Conduct complies with all the letter and spirit of the Higher Education Act, as amended by the Higher Education Opportunity Act of 2008.

FRCC as an institution or any individual officer, employee or agent of FRCC shall not enter into any revenue-sharing arrangements with any lender.

No officer or employee of FRCC who is employed in the financial aid office or who otherwise has responsibilities with respect to education loans, or agent who has responsibilities with respect to education loans, or any of their family members, shall solicit or accept any gift from a lender, guarantor, or servicer of education loans. For purposes of this prohibition, the term "gift" means any gratuity, favor, discount, entertainment, hospitality, loan, or other item having a monetary value of more than a de minimis amount.

An officer or employee of FRCC who is employed in the financial aid office or who otherwise has responsibilities with respect to education loans, or an agent who has responsibilities with respect to education loans, shall not accept from any lender or affiliate of any lender any fee, payment, or other financial benefit (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 education loans.

FRCC does not have a preferred lender list (PLL) for alternative loans and, therefore, will not use a preferred lender list (PLL) to:

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- Require a prospective borrower to use a lender on a PLL;
- Deny or otherwise impede a borrower's choice of lender;
- Cause unnecessary certification delays for borrowers who use a lender that

is not listed on a PLL.

FRCC shall not request or accept from any lender any offer of funds to be used for private education loans, including funds for an opportunity pool loan, to students in exchange for the institution providing concessions or promises regarding providing the lender with:

- a specified number of loans made, insured, or guaranteed under Title IV;
- a specified loan volume of such loans; or
- a preferred lender arrangement for such loans.
- FRCC shall not request or accept from any lender any assistance with call center staffing or financial aid office staffing.

Any employee who is employed in the financial aid office, or who otherwise has responsibilities with respect to education loans or other student financial aid, and who serves on an advisory board, commission, or group established by a lender, guarantor, or group of lenders or guarantors, shall be 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