



Title IV Loan Code of Conduct

The Higher Education Opportunity Act requires that all educational institutions participating in Title IV programs develop and comply with a code of conduct that prohibits conflicts of interest between financial aid personnel and educational loan lenders. In order to be in compliance with this requirement, Northwest College has adopted the following code of conduct:

1. Neither Northwest College as an institution, nor any individual officer, employee, or agent of Northwest College will enter into any revenue sharing arrangements with any lender.
2. No officer, employee, or agent of Northwest College will be allowed to solicit or accept gifts from a lender, guaranty agency, or loan servicer. For purposes of this prohibition, the term "gift" refers to any gratuity, favor, discount, entertainment, hospitality, loan, or other item having a monetary value of more than a nominal amount.
3. No officer, employee, or agent of Northwest College will accept compensation for any type of consulting arrangement or other contract to provide services to a lender or on behalf of a lender, relating to educational loans. This "compensation" includes any fee, payment, or other financial benefit (including the opportunity to purchase stock).
4. Northwest College will not request or accept any assistance with call center staffing or financial aid office staffing from any lender.
5. Northwest College will not assign through award packaging, or other means, any first-time borrower's loan to a particular lender. Northwest College will also not refuse to certify or delay certification of any loan based on the borrower's selection of a particular lender or guaranty agency.
6. Northwest College will not request or accept any offer of funds to be used for private education loans from any lender in exchange for providing the lender with a specified number/volume of Title IV loans or a preferred lender arrangement for Title IV loans.
7. No officer, employee, or agent of Northwest College will derive any material benefit from serving on an advisory board, commission, or group established by a lender, guarantor, or group of lenders or guarantors. However, such individuals may be reimbursed for reasonable expenses incurred in serving on such an advisory board, commission, or group.

This code of conduct applies to all officers, employees, and agents of Northwest College who have responsibilities with respect to student educational loans.