



Student Loan Code of Conduct

(Last Updated: October 2025)

Introduction and Purpose

Cornell University ("Cornell") seeks to ensure students receive unbiased information about their student loan options, maintain freedom in their choice of lenders, and benefit from transparent institutional practices that meet or exceed all federal and state regulatory requirements.

With respect to private education loan options, Cornell also seeks to help students and their families identify the most competitive and reliable lenders whenever such loans are considered. Private education loans are non-federal student and parent loans offered by banks, credit unions, and other financial institutions. Unlike federal student loans, private education loans are offered with varying terms, rates, and benefits determined by the lender.

This Code of Conduct summarizes ethical standards which ensure transparency, protect student interests, and prevent conflicts of interest. This code applies to all Cornell employees involved in private education loan processes, information sharing, or student counseling.

Code of Conduct

This code is developed in accordance with the *Higher Education Act of 1965, as amended by the Higher Education Opportunity Act of 2008*. Where applicable, this code also incorporates requirements from the *New York State Student Loan Accountability, Transparency and Enforcement (SLATE) Act*.

1. Conflicts of Interest

Cornell financial aid staff and employees who have responsibilities with respect to student loans must discharge their Cornell duties in a manner that is free from real or apparent bias motivated by self-interest and report and manage actual and apparent conflicts of interest. ([University Policy 4.14](#))

2. Gifts

Cornell and its employees will not directly or indirectly solicit, accept or receive gifts or anything of value, on their own behalf or on behalf of another, from a private lender in exchange for loan referrals, recommendations, or any other advantage or preference. ([University Policy 4.6](#))

Cornell employees must report any attempt by a private lender to give a gift to the university or its employees.

3. Arrangements and Agreements

Cornell will not permit revenue sharing agreements with any lender.

Cornell will not permit agreements to provide high-risk loans (or any opportunity pool loans) in exchange for a promise to give concessions or other advantages that may prejudice other borrowers or potential borrowers.

Cornell will not certify private education loans offered by any lender who imposes prepayment or repayment penalties upon borrowers in any form.

4. *Co-Branding*

Cornell will not permit a private lender to use the university's name, emblem, mascot, logo, or other words, pictures, or symbols readily identified with the university in any way that implies Cornell endorses the lender's products or services. ([University Policy 4.10](#))

5. *Advisory Boards*

Cornell will not permit any employee who has responsibilities with respect to student loans or other financial aid from receiving anything of value in recognition of any type of consulting arrangement or service on an advisory board, commission or other group established by a private lender or group of lenders.

Cornell employees must report all participation on advisory boards or financial interests related to any lending institution.

6. *Staffing Assistance*

Cornell will not permit employees or agents of private lenders to represent themselves as employees, representatives or agents of the university.

Cornell will not permit employees or agents of private lenders to staff any Cornell financial aid office, call center, or other business process.

7. *Federal Student Loan Options and Information Disclosures*

Cornell will provide relevant information about federal student loan options to all potential borrowers who consult with university financial aid offices regarding borrowing options or private education loans *before* certifying a private loan request.

8. *Preferred Lender Lists*

Cornell may publish preferred lender lists in accordance with all applicable federal and New York State laws and regulations. Cornell's decisions to include a lender on any preferred lender list are solely based on the best interests of borrowers without regard to the financial interests of Cornell. When such lists are published:

- Cornell will disclose the process, criteria, and methodology used to select private education lenders for inclusion on preferred lender lists.
- Preferred lender lists will be updated periodically, no less than annually.
- Preferred lender lists are for the benefit of prospective borrowers only – Cornell will not assign specific lenders, refuse to certify, or delay certification of any private education loan based on the borrower's lender choice.
- Private education lenders may be excluded from preferred lender lists and Cornell may refuse to certify private education loan requests from lenders whose policies, practices, or loan products do not comply with applicable federal, state, and Cornell policies.

Reporting Violations

Any person who has reason to believe this code of conduct has been violated should submit a report via the [Cornell Ethics and Compliance Hotline](#) or directly to the NYS Education Department.