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## **Conflict of Interest: Commissioners and Volunteer Peer Evaluators**

The purpose of this policy and the attached “Conflict of Interest Disclosure Statement” is to ensure objectivity in the accreditation process by maintaining integrity, credibility, and codes of good conduct in accreditation and policy making processes and avoiding actual conflicts, potential conflicts, or even the appearance of conflicts of interest in the Commission’s decisions. Individuals covered by this policy may serve in the capacity of Commissioner, Commissioner *Pro Tempore*, or in the volunteer peer evaluator roles of Team Chair, Team Member, Substantive Change Committee Member, Periodic Review Report Reviewer, and Finance Associate.

The Commission relies on the personal and professional integrity of individuals to refuse any assignment where the potential for an actual or perceived conflict of interest exists. The Commission will not assign a volunteer peer evaluator under any of the following circumstances known to the Commission. The Commission also expects any volunteer peer evaluator acting on behalf of the Commission to recuse him or herself from any discussion or accreditation decision if any of the following conditions exist.

- The individual’s home institution is part of the same public or private system.
- The individual has been a candidate for employment in the evaluated institution within the past year.
- The individual has been employed by the institution within the past five years.
- The individual belongs to the governing body of the institution.
- The individual has a personal, business, consultative, or other interest in or relationship with the institution under review and consideration, or with its affiliates, partners, or other constituents or interested parties, that could affect his or her objectivity.
- The individual or the individual’s institution has a material interest in a particular accreditation outcome based on a significant business or other fiduciary agreement (excluding routine articulation or similar inter-institutional agreements).
- The individual has a family member who is an employee, board member, candidate for employment, applicant for student enrollment, or enrolled student at the

institution. A “family member” is a spouse, partner, parent, grandparent, child, grandchild, sibling, aunt, or uncle, whether by blood, marriage, or adoption, or any other person in the individual’s household.

- The individual or his or her immediate family member is an alumnus or alumna of the institution. An “immediate family member” is a spouse, partner, minor child, other dependent, or any other person in the individual’s household.
- The individual or his or her immediate family members hold shares of stock (excluding shares held indirectly through mutual funds, insurance policies or blind trusts) in an applicant, candidate or accredited institution, or their respective parent company or affiliated entity.
- In the individual’s or the Commission’s judgment, there is any other circumstance that could be perceived as a conflict of interest.

All Commissioners and volunteer peer evaluators will exercise their best efforts to comply with these guidelines. However, failure to comply with these guidelines does not invalidate Commission actions nor constitute grounds for liability of the individual peer evaluator, individual Commissioner, the Commission itself, or staff, unless applicable law so requires.

### **Consulting**

No member of a visiting team may serve as a paid consultant to the institution being visited for a period of one year following the official accrediting action. The institution is expected to respect the process by not engaging any team member as a consultant for one year following evaluation or considering any team member for permanent employment within one year of the evaluation.

Commissioners may not receive consulting fees or any other form of remuneration for any accreditation-related consulting from any Commission member or candidate institution. Seminars or workshops for faculty or administrators to share institutional or discipline-related information or expertise are not considered to be accreditation-related.

### **Commissioners**

Each Commissioner shall submit a conflict of interest statement annually, or when a relevant change in circumstances occurs. No Commissioner will knowingly be assigned as a Commissioner-reader or reviewer of any institution for which a conflict exists. Commissioners shall absent themselves during any substantive discussion and recuse themselves from any decision involving an institution with which they have a conflict.

Commissioners may not receive honorary degrees from any Commission member or candidate institution.

Commissioners may not be employed by the Middle States Association or the Commission on Higher Education within a one-year period following their tenure in office.

## **Other Conflicts**

Restrictions regarding insider trading of the stock of publicly held companies apply to Commission members, Commission staff, and any other representative of the Commission. No person who has non-public information about any issuer of securities of a public company, including without limitation because of Commission matters (including without limitation proposed or final actions about individual member or Candidate institutions), may personally or on behalf of others buy or sell any security of such issuer, disclose or use such information until it is public or use it for personal gain or the gain of others, or for any other purpose that would be or appear to be inappropriate use of such information.

Commissioners and staff who hold securities in a publicly traded institution, the parent corporation of a for-profit institution, or affiliated entity must disclose the conflict of interest on the attached form and recuse themselves from any discussion, deliberation, or decision making regarding the institution.



# Middle States Commission on Higher Education

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## Conflict of Interest Disclosure Statement

In accord with the Commission’s policy statement, “Conflict of Interest: Commissioners and Volunteer Peer Evaluators,” please **read carefully the disclosure statement below** and, to the best of your judgment, **disclose any conflicts or potential conflicts of interest at the bottom, and sign and return the form to the Commission office as soon as possible**. The Commission will use the information provided to help control the compilation and distribution of information for participants in the accreditation process, to monitor the participation of readers and representatives on visits, and to determine who participates in discussions or decisions concerning institutions. If, in your opinion, you are not involved in any situations or circumstances which would be considered conflicts or potential conflicts of interest, simply write “None” on the form.

**Please indicate how you are participating in the accreditation process.** You may be asked to complete a form each time you participate in a different aspect of accreditation. If you are a Commissioner or being considered as a Commissioner, please also indicate whether you are a Public Representative of the Commission. A Public Representative is a Commissioner who is **not** an employee, governing board member, owner, shareholder, or consultant of an institution accredited by the Commission or a candidate for accreditation by the Commission; who is **not** a member of any trade association or membership organization related to, affiliated with, or associated with the Commission; and who is **not** a spouse, parent, child or sibling of any of the above.

**I am serving or being considered as a:**

- Commissioner
- Commissioner *Pro Tempore*
- Team Chair
- Team Member
- Substantive Change Committee Member
- PRR Reviewer
- Finance Associate

**If you are serving or being considered as a Commissioner, please indicate your status:**

- I **am** (being considered) as a Public Representative of the Commission
- I **am not** (being considered as) a Public Representative of the Commission

I have read and fully understand the attached “Conflict of Interest: Commissioners and Volunteer Peer Evaluators” policy.

To the best of my knowledge, I have disclosed below all situations and circumstances which may be considered conflicts of interest or potential conflicts of interest. Also, during my service to the Commission, I will voluntarily disclose any situation or circumstance which may, in my judgment, be considered a conflict or potential conflict of interest as it arises.

*Attach separate sheet(s), if necessary:*

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Signature: \_\_\_\_\_

Please print or type: \_\_\_\_\_ Date: \_\_\_\_\_