



New England Commission of Higher Education
301 Edgewater Place, Suite 210, Wakefield, MA 01880
Tel: 781-425-7785 | neche.org

Policy on Conflict of Interest for Non-Credit Recognition

In carrying out its recognition responsibilities, the New England Commission of Higher Education seeks to ensure that its decisions are based solely on the application of professional judgment to the information resulting from its processes. Therefore, it seeks to avoid both the reality and the appearance of conflict of interest. For purposes of this policy statement, conflict of interest is defined as:

a circumstance in which an individual's capacity to make an impartial or unbiased recognition decision may be affected because of a prior, current, or anticipated organizational affiliation(s), other significant relationship(s), or association(s) with the organization under review.

The following examples are meant to be illustrative.

Affiliation:

employee, board member, appointee, consultant, former student, or graduate;

Other Significant Relationships:

affiliation with another institution in the same system of public higher education;
affiliation with another organization which is a member of a consortium or has a substantial cooperative or contractual arrangement with the organization under review;

affiliation with an organization competing directly with the organization;

under review; having a close relative or partner affiliated with the organization under review;

former employee, or, within the past ten years, seriously considered candidate for a position;

stockholder or other financial interest in an organization or corporation owning an organization;

Other Associations:

knowledge or personal interest concerning the organization under review from whatever source, including competitive geographical proximity, which might prejudice decision making.



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Non-Credit Recognition Committee members and Commissioners. Non-Credit Recognition Committee (NCRC) and Commission members are committed to full disclosure and restraint in any consideration involving a conflict of interest. Members of the NCRC or Commission absent themselves from deliberations or votes on decisions regarding organizations with which they are affiliated. They do not participate in discussions or vote on decisions on organizations to which they have acted as consultants or with which they have relationships or other associations where they have, or where it would reasonably appear they have, a conflict of interest. To prevent or resolve potential conflicts of interest, NCRC members or Commissioners who are uncertain regarding the possible appearance or reality of conflict of interest shall seek the advice of Commission staff. In general, however, if there is any doubt on the part of a NCRC member or Commissioner, it should be resolved by that individual refraining from any discussion or action relating to the provider under review.

Evaluation Team Members. Recognition is a process of peer review. In that regard, the Commission must balance two important priorities: identifying potential evaluators from peer organizations (including, sometimes, competitors), and avoiding evaluators who have, or appear to have, a conflict of interest in participating in a specific organizational review. To prevent or resolve potential conflicts of interest, this balance is sought through consultation with the individuals and the organizations involved. The Commission recognizes that it is not possible to be aware of all circumstances where a conflict, or the appearance of a conflict, may exist. Therefore, organizations are asked to review proposed evaluation teams and bring to the attention of the Commission any conflicts of interest or the appearance of such.

Individuals invited to participate in the evaluative process are asked to decline serving in the review of an organization where they have, or where it might reasonably appear that they have, a conflict of interest.

In addition, an evaluator refrains from serving as a consultant, paid or otherwise, or seeking employment with organizations reviewed for at least one year following Commission action on the organization. Questions regarding the application of this policy should be directed to the Commission's staff.

Commission Staff. The Commission staff is responsible for managing the recognition process and for ensuring that all policies and procedures are carried out reliably and fairly. The staff does not engage in the evaluation of organizations, nor does it take overt responsibility for operating the recognition process at individual organizations. However, it is responsible for providing guidance on request and is otherwise involved in developing and providing services to assist



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organizations in structuring their own use of the quality assurance framework and for assisting evaluators in preparation for their assignments.

This policy also applies to members of appeals panels, consultants hired to work for the Commission, and other representatives of the Commission.

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