

## Policy on Conflict of Interest

In carrying out its accreditation 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 accreditation decision may be affected because of a prior, current, or anticipated institutional affiliation(s), other significant relationship(s), or association(s) with the institution 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, or founded by the same religious order;

affiliation with another institution which is a member of a consortium or has a substantial cooperative or contractual arrangement with the institution under review;

affiliation with an institution competing directly with the institution under review;

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

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

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

**Other Associations:**

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

**Commissioners.** Commission members are committed to full disclosure and restraint in any institutional consideration involving a conflict of interest. Members of the

Commissioners absent themselves from deliberations or votes on decisions regarding institutions with which they are affiliated. They do not participate in discussions or vote on decisions on institutions 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, Commissioners who are uncertain regarding the possible appearance or reality of conflict of interest shall seek the advice of the Commission chair. At the request of the Commission chair, the Commission can determine the question by vote. In general, however, if there is any doubt on the part of a Commissioner, it should be resolved by the Commissioner refraining from any discussion or action relating to the institution under review.

Commissioners may offer to their own institutions advice on Commission procedures and expectations. However, during their service on the Commission and for one year following the completion of their term, Commissioners may not serve as consultants, paid or otherwise, on matters related to regional accreditation for other institutions affiliated or potentially affiliated with the Commission.

**Evaluation Team Members.** Accreditation is a process of peer review. In that regard, the Commission must balance two important priorities: identifying potential evaluators from peer institutions (including, sometimes, competitors), and avoiding evaluators who have, or appear to have, a conflict of interest in participating in a specific institutional review. To prevent or resolve potential conflicts of interest, this balance is sought through consultation with the individuals and the institutions 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, institutions 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 institution 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 institutions reviewed for at least one year following Commission action on the institution. 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 accreditation process and for ensuring that all policies and procedures are carried out reliably and fairly. The staff does not engage in the evaluation of institutions, nor does it take overt responsibility for operating the accreditation process at individual institutions. However, it is responsible for providing guidance on request and is otherwise involved in developing and providing services to assist institutions in structuring their own use of accreditation procedures and for assisting evaluators, including team chairs, 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.

*June 1994*  
*September 2001*  
*November 2003*  
*September 2010*  
*November 2012*  
*April 2013*