



**NEW ENGLAND ASSOCIATION OF SCHOOLS AND COLLEGES
COMMISSION ON INSTITUTIONS OF HIGHER EDUCATION**

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**Policy Statement on
Conflict of Interest**

In carrying out its accreditation responsibilities, the Commission on Institutions 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 with which there is a significant religious connection;

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 affiliated with the institution under review;

former employee, or seriously considered candidate for a position;

Other Associations:

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

Evaluation Team Members. In selecting evaluation teams, the Commission avoids individuals who have, or appear to have, a conflict of interest in participating in a specific institutional review. However, the Commission also recognizes that it is not possible to be aware of all circumstances where a conflict, or the appearance of a conflict, may obtain. Therefore, institutions in reviewing proposed evaluation teams 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. Questions regarding the application of this policy should be directed to the Commission's staff.

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.

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

In addition, a Commissioner refrains from serving as a consultant, paid or otherwise, with institutions reviewed for at least one year following Commission action on the institution.

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 consultative services 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.

*June, 1994
September, 2001
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