

## NWCCU POLICIES | CONFLICT OF INTEREST

---

This Policy is intended to ensure that in carrying out its accreditation responsibilities, the Northwest Commission on Colleges and Universities seeks to ensure that its decisions are based solely on the application of professional judgment regarding the information resulting from its evaluation procedures. Therefore, it seeks to avoid both the reality and the appearance of a conflict of interest. For purposes of this policy, a 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 prior, current, or anticipated institutional affiliations(s), other significant relationship(s) or associations(s) with the institution under review.

The following are examples of affiliations that should be disclosed to the Commission and Commission staff that may disqualify individuals from discussing and/or voting on institutional accreditation actions.

### **Affiliations and Relationships**

#### **Disclose and Disqualify:**

- Current Employee
- Former employee within five years
- Board member within five years
- Consultant within five years
- Graduate within five years
- Affiliation with another institution in the same system or the same sector within a state
- Affiliation with another institution in which it has a significant interest
- Having sought within the last five years or is currently seeking a position at the institution under review.

#### **Disclose Only:**

- Former employee more than five years
- Board member more than five years
- Consultant more than five years
- Graduate more than five years
- Having a close relative or domestic partner at an institution under review
- Having sought a position beyond five years at the institution under review

#### **Other:**

Knowledge or personal interest concerning the institution under review from whatever source, including competitive geographical proximity which might prejudice independence of judgment and decision-making.

Evaluation Committee Members. In selecting evaluation committees, 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, pertains. Therefore, institutions, in reviewing proposed evaluation committees, are encouraged to bring to the attention of Commission staff any conflicts of interest or the appearance of such. Individuals invited to participate in the evaluation process are expected to decline to serve in the evaluation of an institution where they have, or where it might reasonably appear that they have, a conflict of interest; potential evaluators are expected to disclose possible conflicts or appearance of conflict to Commission Staff.

In addition, an evaluator is expected to refrain from serving as a consultant for the institution visited, paid or otherwise for two years. The Commission also views as conflict of interest an evaluator's intent to use an institutional evaluation visit as an opportunity to seek employment.

Appeal Panel Members. In selecting appeal panels, the Commission avoids individuals who have, or appear to have, a conflict of interest in participating in a specific institutional appeal. 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, pertains. Therefore, institutions, in reviewing proposed appeal boards, are encouraged to bring to the attention of Commission staff any conflicts of interest or the appearance of such. Individuals invited to participate in the appeal process are expected to decline to serve in the appeal of an institution where they have, or where it might reasonably appear that they have, a conflict of interest; potential Appeal Board members are expected to disclose possible conflicts or appearance of conflict to Commission Staff.

Public members of the Appeal Panel must additionally acknowledge that neither the public member, nor their parents, spouses, children, or siblings are an employee, member of a governing board, owner, shareholder or consultant of an institution that is accredited by the Northwest Commission on Colleges and Universities.

In addition, an Appeal Board member is expected to refrain from serving as a consultant for the appealing institution, paid or otherwise for two years. The Commission also views as conflict of interest an Appeal Board member's intent to use an institutional appeal as an opportunity to seek employment.

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

Public members of the Board of Commissioners must additionally acknowledge that neither the public member, nor their parents, spouses, children, or siblings are an employee, member of a governing board, owner, shareholder or consultant of an institution that is accredited by the Northwest Commission on Colleges and Universities.

Commission Staff. The Commission staff members are committed to full disclosure and restraint in any institutional consideration involving a conflict of interest. The Commission staff is responsible for managing the accreditation process and for ensuring that all policies and procedures are carried out fairly. The staff does not engage in the evaluation of institutions, nor does it take responsibility for operating the accreditation process at individual institutions. However, the staff is responsible for providing advice and assistance on request, and is otherwise involved in developing and providing services to assist institutions in structuring their own use of accreditation procedures.

Adopted 1996, Revised 2005, 2010/2011, 2013, 2015