



CONFLICT OF INTEREST

1.6. CONFLICT OF INTEREST

The purpose of conflict of interest policies is to document actions taken by the Commission on Secondary Schools to maintain the integrity, credibility, and codes of good practice in the accreditation process. Such policies are designed to assure fairness and impartiality in decision-making and to avoid actual or potential conflicts or even the appearance of conflicts in the Commission's work. All individuals participating in the CSS accreditation process, including but not limited to on-site evaluators, Commissioners, consultants, CSS staff members, and anyone serving as a CSS representative, have an obligation to avoid real or perceived conflicts of interest in carrying out their accrediting responsibilities.

In addition to guidelines on conflict of interest outlined in *Article X—Miscellaneous, Section 3—Conflicts of Interest* of the Bylaws for the Middle States Association, the Commission on Secondary Schools shall abide by the following policies:

1.6.1. Conflict of Interest Statements

All members of the Commission on Secondary Schools, advisory committees, and staff shall sign, at least annually, a Conflict of Interest Statement. Evaluation team chairs and team members shall be asked to sign such statements each time they agree to serve on a specific evaluation team. These statements will be kept on file in the Commission offices for a period of one year.

1.6.2. Conflict of Interest Policies for Members of the Commission on Secondary Schools and Advisory Committees

1.6.2.1. Definition of Conflict of Interest: A conflict of interest is defined as any relationship with a CSS-accredited program, or a program that is seeking CSS accreditation, that could interfere with the ability of the individual to exercise objectivity in the accreditation process. A perceived conflict of interest is any such relationship that could be perceived as interfering with the individual's ability to exercise objectivity. Circumstances that may create a real or perceived conflict of interest include, but are not limited to, situations in which an individual:

- Is employed by the institution that is seeking or already holds CSS accreditation, or has a close relative (spouse, parent, child, or sibling) who is so employed,
- Is, or has been, a consultant to the institution, or has a close relative who is, or has been, such a consultant,
- Has a monetary or personal interest in the outcome of the accreditation decision regarding the institution,
- Has served on the institution's visiting team, or
- Has a close personal relationship with an individual or individuals involved with the institution.

No member of the Commission on Secondary Schools or any advisory committee may vote on any accreditation action for any institution with which the member has an employment, administrative, supervisory, governing or other relationship that might prejudice or appear to prejudice his or her vote. Commissioners or advisory committee members with such conflicts of interests shall exclude themselves from the deliberations as well as the vote/recommendation.

1.6.2.2. Abstention from Voting: Commissioners may be asked by the Commission Chair to absent themselves from any Commission meeting during any discussion or decision involving an institution with which they have a current or potential relationship or conflict. The minutes of the Commission meeting must clearly reflect that the individual was recused from the vote. The Chair of the Commission shall remind Commissioners at the beginning of each meeting of their responsibilities to avoid all real and perceived conflicts of interest.

1.6.2.3. Commissioners/Advisory Committee Members as Readers: Commissioners and advisory committee members may not be assigned as readers for an institution with which they have any current or potential conflict of interest.

1.6.2.4. Future Employment with MSA/CSS: Members of the Commission may not be employed by the Middle States Association or the Commission on Secondary Schools within a one-year period following the expiration of their tenure in office on the Commission.

1.6.2.5. Prior Consulting Activities: Members of the Commission or advisory committees that have served in a consulting relationship of any kind with the institution may not serve on future accreditation teams or participate in decision-making about the accreditation of the institution.

1.6.3. Conflict of Interest Policies for Staff

1.6.3.1. CSS Staff Disclosure Responsibilities: Any CSS staff member having a professional relationship with any member institution or related agency shall consult with the Executive Director about duties and responsibilities within each organization. The purpose of this consultation is to ensure that there is no conflict of interest or improper influence on the work or decision-making processes of CSS. It is the responsibility of the employee, in all cases, to disclose and assist with determining whether or not an outside relationship does in fact constitute a conflict of interest.

1.6.3.2. Staff Work Assignments: Staff liaisons to member institutions will not be assigned an institution from which they have graduated or have been employed within the last three years. In making assignments, the Executive Director also will consider the status at an institution of close personal friends or family members and the holding of privileged information not available to others involved in the accreditation process.

1.6.3.3. Future Employment in a Member Institution: If a staff member applies for a position with an institution for which he or she is the designated liaison, the staff member must immediately relinquish responsibility for that institution. No staff member may serve as a liaison to an institution at which he or she has applied for a position within the last three years.

1.6.3.4. Consulting by Staff: Staff is prohibited from serving as paid consultants to any educational institution within the Middle States Association region.

1.6.4. Conflict of Interest Policies for Evaluation Team Chairs and Members

No evaluation team chair or member of an evaluation team shall have any interest in the institution being visited that could be seen as a conflict of interest. For postsecondary institution evaluations, a team member may not serve on an evaluation team to a school from which s/he has graduated or on a team within the same school district where s/he is employed. The Executive Director shall endeavor to avoid such committee assignments and shall immediately investigate any allegations brought to his/her attention.

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