

# Adventist Accrediting Association

## Conflict of Interest Policy

In carrying out their accreditation responsibilities, members of the AAA Board, staff, and site visit teams seek to ensure that their decisions are based solely on the application of professional judgment to the information resulting from their evaluation procedures. Therefore, they seek to avoid conflict of interest and the appearance of conflict of interest. A conflict of interest is defined as any circumstance in which an individual's capacity to make an impartial and unbiased accreditation decision may be affected or perceived to be affected because of a prior, current, or anticipated institutional affiliation(s), or other significant relationship(s) with an accredited institution or an institution seeking recognition by the Board.

Because of the common objectives embraced by the various organizational units and institutions of the Seventh-day Adventist Church, membership held concurrently on more than one denominational committee or board does not in itself constitute a conflict of interest, provided that all the other requirements of the policy are met. While serving as an officer, trustee, or director of multiple denominational entities is thus acknowledged and accepted, a member serving on the AAA Board is expected to act in the best interests of the Adventist Accrediting Association and its role in denominational structure.<sup>1</sup>

The following are examples of affiliations and other significant relationships pertaining to visiting team members, AAA Board members, and AAA Board staff that present a conflict or the appearance of a conflict. Such affiliations and significant relationships should be disclosed to the executive secretary for discussion and evaluation. Affiliations with institutions under review that would pose a conflict of interest may include, but are not limited to any of the following categories during the past five years: employee, former employee, applicant for employment, board member, appointee, paid consultant, current student, graduate, or instructor. Any relationship involving a written agreement and/or compensation may create a conflict of interest or the appearance of a conflict of interest and should be included. Other significant relationships that should be reported for their potential in prejudicing decision making include, but are not limited to: having a close relative (such as but not limited to spouse, child, parent or sibling) affiliated with the institution under review, receiving an award from the institution, and/or having a close personal or professional relationship at the institution under review where that relationship might have a material effect on accreditation review.

**AAA Board Members:** AAA Board members shall make proposals, vote and otherwise conduct themselves in Board meetings and activities in a manner consistent with their best, impartial and unfettered judgment, and in furtherance of the Board's purposes, without regard for the potential impact of the Board's decisions on their own professional or financial interests or those of their friends, relatives and colleagues.

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<sup>1</sup> See General Conference Working Policy E 85 Conflict of Interest and/or Commitment

Board members are expected to commit themselves to full disclosure and restraint in any institutional consideration involving a conflict of interest or appearance of conflict of interest.

**Visiting Team Members:** In selecting visiting teams for a specific institutional review, individuals who have a known conflict of interest should be excluded. If unsure about a conflict of interest, individuals are expected to disclose possible conflicts to the Board staff via the Conflict of Interest Form for discussion and evaluation prior to appointment to a team. It is the policy of the Board that visiting team members not serve as paid consultants with an institution they have visited for one year following the visit. Institutions, in reviewing proposed teams, are encouraged to bring to the attention of Board staff any possible conflicts of interest or situation that might be perceived as a conflict of interest.

**Board Staff:** Board staff are committed to full disclosure and restraint in any institutional consideration involving a conflict of interest or appearance of a conflict of interest. Staff members shall recuse themselves from voting on decisions regarding institutions with which they have been employed, served as a director/trustee or served as a paid consultant during the previous five years. Staff members may not participate in private consulting with any institution accredited by or a candidate for accreditation with the Board for at least one year after serving on the Board. Staff also may not receive honorary degrees or awards from any institution with candidate or accredited status with the Board for at least one year after serving on the Board. Disclosure of any conflict of interest, or situation that might reasonably be perceived as a conflict of interest, must be provided to the executive secretary.

In the case of a conflict involving the executive secretary, notice shall be given to the Board chair. In the case of a conflict involving the Board chair, or for any unclear conflicts or appearance of conflicts involving team members, board staff, or board members, the AAA Board Conflict of Interest subcommittee will be consulted. A record of institutions where there is a conflict of interest or appearance of a conflict will be kept in a separate file by the executive secretary of the Adventist Accrediting Association.

**Consultants and other agency representatives:** Consultants and others with a formal contractual relationship with AAA, who, in the course of their work may become involved in Board policy, institutional evaluation, or the accreditation decision of specific institutions, will be required to complete the Conflict of Interest Form and the Form shall be kept on file.

### **Mitigating Potential or Actual Conflicts of Interest**

Conflicts that are deemed to have the potential or are likely to be perceived as having the potential to have a direct and significant affect on a decision must be eliminated, mitigated, or managed. Such strategies for eliminating, mitigating, or managing conflicts can include:

## **Removal**

The best way to handle conflicts of interests is to avoid them entirely. Individuals invited to participate 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. For the purposes of this policy, five years is established as the limit of prior association. Other means of removing a conflict include, but are not limited to, divestiture of significant financial interests; disqualification from participation in all or a portion of the meeting or site visit; and/or severance of relationships that create actual or potential conflicts.

## **Disclosure**

If known in advance, all present and potential conflicts of interest must be disclosed by Board members, staff and potential team members.

1. Board members and staff shall complete an annual Conflict of Interest Form. Such disclosures shall be submitted to the executive secretary of AAA for review by the Board's Conflict of Interest committee. The committee shall resolve or determine the steps required to manage, the potential conflict, with appropriate information provided to the Board.
2. Potential members of a visiting team shall inform the staff or chair of the visiting team and the head of the institution being visited of any disclosures they may need to make.

If not known in advance, conflicts of interest or potential conflicts of interest shall be disclosed to the person in charge of the meeting or activity and to the full meeting. The voting members in such a meeting shall determine whether or not the matter disclosed constitutes an actual or perceived conflict of interest and the manner in which this is to be handled.

## **Recusal**

Those with a conflict of interest are expected to recuse themselves from (i.e., abstain from) decisions where such a conflict exists. The imperative for recusal varies depending upon the circumstance, ranging from abstaining from discussion or voting, to removing oneself from the room or situation to avoid participation in all discussion or deliberation on the issue. All such actions should be recorded in any minutes or records kept. Following full disclosure of the present or potential conflict, the Board may decide that no conflict of interest exists and invite the person in question to participate.

Members of the Board will at a minimum abstain, and in some cases absent themselves from the room when there are deliberations or votes on decisions regarding institutions with which they are affiliated or with which they have participated as a member of the most recent visiting team.

**Training**

Training on the policy shall be provided to prospective AAA site team members and AAA Board members by means of the Conflict of Interest form.

**Policy Application**

Questions or concerns regarding the application of this Policy should be addressed to the executive secretary of the AAA or the General Conference Office of General Counsel.

## **Adventist Accrediting Association**

THIS DECLARATION applies, to the best of my knowledge, to all members of my immediate family (spouse, children, parents, siblings) and its provisions shall protect any organization affiliated with or subsidiary to the Adventist Accrediting Association. In the event facts change in the future that may create a potential conflict of interest or the appearance of a conflict, I agree to notify the Executive Secretary of the Adventist Accrediting Association in writing.

1. I have read the Statement of Ethical Foundations and the policy on Conflict of Interest.
2. I am in compliance with the AAA policy on Conflict of Interest.
3. Except as disclosed:
  - a. Neither I, nor a family member, have a material financial interest, business relationship, or institutional relationship which competes with or conflicts with the interests of the Adventist Accrediting Association as stated in the *AAA Conflict of Interest Policy*.
  - b. Neither I nor a family member have a material financial interest in or have been an employee, officer, director, or trustee of, nor receive/have received financial benefits either directly or indirectly from any enterprise (excluding less than five percent [5%] ownership in any entity with publicly traded securities) which is or has been doing business with or is a competitor of the Adventist Accrediting Association, within the last five years.
  - c. Neither I nor a family member receive/have received any payments or gifts, monetary or non-monetary (other than of nominal value) from other denominational entities, suppliers, or agencies doing business with the Adventist Accrediting Association
  - d. Neither I nor a family member serve/have served as an officer, director, trustee, or agent of any organization affiliated with or subsidiary to the Adventist Accrediting Association in any decision-making process involving financial or legal interest adverse to the Adventist Accrediting Association, within the last five years.

### **Definitions**

A “family member” is a spouse, parent, child or spouse of a child, brother, sister, or spouse of a brother or sister, of an interested person.

A “material financial interest” in an entity is a financial interest of any kind, which, in view of all the circumstances, is substantial enough that it would, or could reasonably be viewed as, affecting an interested person’s or family member’s judgment with respect to transactions to which the entity is a party. Where the potential for pecuniary gain or the appearance of it is involved, as in reporting on or evaluating a current or potential direct

competitor or partner or an institution in which the participant has a financial interest, the participant has a conflict of interest.

An “appearance of conflict” means there is an appearance of partiality involved, as in a situation where the person who has a conflict of interest has a relationship with an institution or its principals is such that evaluations or decisions may appear to be unduly influenced by that relationship.

**Disclosures**

Please specify any conflicts of interest or potential conflicts of interest, as described in the *Conflict of Interest Policy*:

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Institution	Reason	Conflict Date
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Institution	Reason	Conflict Date
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Institution	Reason	Conflict Date
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Institution	Reason	Conflict Date
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Institution	Reason	Conflict Date
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I have read and fully understand the AAA *Conflict of Interest Policy* and, to the best of my knowledge, have disclosed all situations and circumstances which may be considered conflicts of interest or potential conflicts of interest. Also, during my association with AAA, I will voluntarily disclose any situation or circumstance which may be considered a conflict or potential conflict of interest, as it arises.

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SIGNATURE

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DATE

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PRINTED NAME, POSITION/TITLE