

Policy Call for Comments: Conflicts of Interest Policy and Procedures (February 2 – 27, 2026)

The Middle States Commission on Higher Education invites comments on the revised *Conflicts of Interest Policy and Procedures*.

Title: *Conflicts of Interest Policy and Procedures*

The Mid-Atlantic Region Commission on Higher Education (MARCHE), doing business as the Middle States Commission on Higher Education (MSCHE or the Commission), seeks to ensure objectivity in the accreditation process by maintaining integrity and credibility in accreditation and policy making processes. The avoidance of actual conflicts, potential conflicts, or even the appearance of conflicts of interest in the Commission's accreditation actions is crucial to upholding integrity and credibility in these processes. A conflict of interest occurs when an individual is unable or may be *perceived* to be unable to fulfill their role with the Commission in an objective and independent manner and as outlined in applicable law and regulations. The purpose of this policy is to summarize the conflicts of interest standards that govern service to the Commission and define those areas that the Commission considers an actual or potential conflict of interest.

Review Type: Substantive Revision of Policy and New Procedures

Review Description: The revised *Conflicts of Interest Policy and Procedures* consolidate two separate conflicts of interest policies for Commission representatives and Commission employees into one policy. New procedures to accompany the revised conflicts of interest policy were developed as part of this review. The revised policy also includes an updated definition of conflicts of interest and clarifies the scope. The procedures clarify the process of disclosing conflicts of interest and address how they are managed throughout the decision-making process.

Key aspects of these revisions include the following:

- Clarifies familial relationships under the scope of conflicts of interests to include the following:
 - current spouse or partner;
 - child or stepchild;
 - sibling or stepsibling;
 - parent or stepparent;
 - any other dependent or person living in the household;
 - aunts or uncles, and
 - nieces or nephews.
- Clarifies that individuals who hold a significant professional relationship in or with an institution that is part of a larger system or has an arrangement with a related entity are considered to have a conflict of interest;

- Updates conflicts of interest definition to include former employment at any point in an individual's career as a conflict (previously 5 years);
- Restricts former Commissioners and Commission staff from service as peer evaluators for one year after their service ends;
- Affirms that Commission representatives (including peer evaluators) must disclose conflicts of interest in the secure MSCHE portal and should review and update conflicts annually in addition to whenever a relevant change in circumstances occurs;
- Affirms that Commission representatives who have an individual or institutional material interest in a particular accreditation action (excluding routine articulation agreements or other similar arrangements) will recuse themselves from assignments related to the institution under review;
- Affirms that Commissioners who are elected to serve as public representatives must certify and maintain their eligibility to serve in this capacity;
- Addresses additional conflict of interest requirements for Commission staff (previously in a separate policy);
- Affirms that peer evaluators may *not* communicate with an institution regarding accreditation activities upon their conclusion;
- Affirms that Commission representatives may not solicit gifts and may only accept nominal gifts valued at \$50 USD or less;
- Affirms that expenses associated with visits will be reimbursed in accordance with *Travel Policy and Procedures* and will not be exchanged directly between Commission representatives and the institution;
- Updates definitions for academic and administrative personnel to include individuals who are or have been significantly engaged with postsecondary activities (ex: teaching, research, program or institutional administration) within the past five years in alignment with changes to the MSCHE Bylaws.

Link to Provide Comments: <https://www.msche.org/policies/20260202-open-policy-call-for-comments/>

Deadline for Comments: February 27, 2026

Next steps: Staff are conducting a call for public comments in accordance with Commission policy [Review of Commission Standards, Requirements of Affiliation, and Policies](#). The policy will be further revised as appropriate for review and approval by the Commission at its June 2026 meeting. Upon approval by the Commission, the revised *Conflicts of Interest Policy and Procedures* will become effective July 1, 2026.

Questions: Any questions about Commission policy in general should be directed to policy@msche.org.

Conflicts of Interest Policy

*Effective Date: Proposed
Version: 2026-02-02 Public Comment
Substantive Revision*

Contents

- I. Purpose
- II. Statement of Policy
- III. Definition of Conflicts of Interest
- IV. Procedures
- V. Definitions

I. Purpose

The Mid-Atlantic Region Commission on Higher Education (MARCHE), doing business as the Middle States Commission on Higher Education (MSCHE or the Commission), seeks to ensure objectivity in the accreditation process by maintaining integrity and credibility in accreditation and policy making processes. The avoidance of actual conflicts, potential conflicts, or even the appearance of conflicts of interest in the Commission's accreditation actions is crucial to upholding integrity and credibility in these processes. A conflict of interest occurs when an individual is unable or may be *perceived* to be unable to fulfill their role with the Commission in an objective and independent manner and as outlined in applicable law and regulations. This purpose of this policy is to summarize the conflicts of interest standards that govern service to the Commission and define those areas that the Commission considers an actual or potential conflict of interest.

II. Statement of Policy

The Commission is committed to maintaining the integrity and credibility of the multi-level accreditation decision-making process. To assure confidence in the fairness and impartiality of its decision-making process, the Commission seeks to avoid circumstances that may lead to allegations of undue influence in the accreditation process, such as relationships that might bias the deliberations or accreditation actions of the Commission; conflicts that would impair the judgment of Commission representatives involved in the multi-level accreditation decision-making; and circumstances that may interfere with an individual's capacity to review institutions objectively. The Commission also seeks to assure that accreditation actions are free of self-interest and personal bias.

Commission representatives, defined in Section V, provide a vital service to the Commission. Personal or professional obligations, considerations, or interests of all Commission representatives shall not interfere with their ability to conduct their duties in a fair and impartial manner. The quality and integrity of the Commission's accreditation actions are dependent upon the diligence, good faith, and integrity of its representatives. Strict adherence to these standards

assure the continued independence, integrity, and reputation of the Commission.

Individuals covered by this policy are all individuals who represent or serve the Commission in accreditation activities, including peer evaluators, Commissioners, and Commission staff as they are defined in Section V. Definitions. For purposes of this policy, Commission representatives are defined as individuals who represent or serve the Commission, including but not limited to, peer evaluators, Commission staff, and Commissioners.

Commission representatives shall exercise their best efforts to comply with this policy. Failure to comply with this policy, however, does not invalidate Commission actions nor constitute grounds for liability of the individual Commission representative, unless applicable law so requires.

The Commission shall take measures to review the nature of any disclosed conflicts of interest and assure that no Commission representative will be assigned to review an institution with which the individual has a conflict or appearance of a conflict.

All Commission representatives are expected to honor this policy.

III. Definition of Conflicts of Interest

The Commission holds the following circumstances to represent actual or potential conflicts of interest and expects any individual acting on behalf of the Commission to disclose the conflict of interest pursuant to the instructions in these procedures and decline the invitation to serve from the Commission if any of the following conditions exist:

1. **System or Related Entity:** The individual holds a significant professional relationship in or with an institution that is currently part of a larger public or private system or has an arrangement with a related entity.
2. **Enrolled Student or Alumni:** The individual or his or her family member is an applicant or enrolled student, or an alumnus or alumna of the institution, or has been awarded an honorary degree by the institution.
3. **Governing Body or Board Member:** The individual serves as a member of the governing body or board of the institution or the individual has a family member who is serving as a member of the governing body or board at the institution.
4. **Employment:** The individual or his or her family member has been employed by the institution at any point in their career or has been a candidate for employment at the evaluated institution within the past two years.
5. **Personal, Business, or Significant Financial Interest:** The individual has a personal, business, consultative, or other interest in or relationship with the institution under review and consideration, or with its affiliates, partners, or other constituents or interested parties, that could affect his or her objectivity, including but not limited to:

- a. The individual has served as a consultant on matters related to or resulting from MSCHE accreditation activities within the previous year;
- b. The individual or the individual's institution has a material interest in a particular accreditation outcome based on a significant business or other fiduciary agreement (excluding routine articulation or similar inter-institutional agreements); or
- c. The individual or his or her family members hold shares of stock (excluding shares held indirectly through mutual funds, insurance policies or blind trusts) in an applicant, candidate, or accredited institution, or their related entity.

6. **Affiliation with the Commission:** The individual has served as a Commissioner or Commission employee within the previous year or has an family member who is a Commissioner, Commission employee, or is currently a candidate for employment at the Commission. This provision applies to eligibility for service as a peer evaluator.

7. **Other Perceived Conflict:** The Commission reserves the right to determine if any other circumstance is a conflict of interest because it has the appearance of or could be perceived a conflict of interest. If in the individual's judgement it could have the appearance of or could be perceived as a conflict of interest, the individual should disclose it.

For purposes of this policy, a family member is defined as a current spouse or partner, child or stepchild, sibling or stepsibling, parent or stepparent, any other dependent or person living in the household, and aunts, uncles, nieces, or nephews.

The Commission considers an individual's family member's employment at the Commission to be a conflict of interest for Commissioners. Individuals whose immediate family members are employed by the Commission are not eligible to serve as Commissioners. If an individual's family member becomes employed by the Commission during the Commissioner's service, the individual must resign from their role as Commissioner.

IV. Procedures

The Commission staff will develop procedures as are necessary to ensure the consistent implementation of policies. Commission representatives shall disclose conflicts of interest in accordance with Commission policy, procedures, law, and federal regulatory requirements. See *Conflicts of Interest Procedures*.

V. Definitions

- A. **Academic personnel.** An individual who is currently or recently engaged within the past five years in a significant manner in postsecondary teaching and/or research, or other appropriate professionals with sufficient responsibility to the institution to assure the continuity and coherence of the institution's educational programs (*definition in MARCHE Bylaws*)
- B. **Administrative personnel.** An individual who is currently or recently directly engaged

within the past five years in a significant manner in postsecondary program or institutional administration (*definition in MARCHE Bylaws*).

- C. **Commission representatives.** Individuals who represent or serve the Commission including but not limited to peer evaluators, Commission staff, and Commissioners.
- D. **Conflict(s) of interest.** Occurs when an individual is unable or may be perceived to be unable to fulfill their role with the Commission in an objective and independent manner and as outlined in applicable law and regulations. Conflicts of interest may include potential, actual, or perceived conflicts of interest as defined in the Commission's *Conflicts of Interest Procedures*.
- E. **Fair market value.** The value of property as determined by the marketplace (or objective purchasers) rather than as determined by a subjective individual.
- F. **Gifts.** Goods or services that may be tangible or intangible and have monetary value obtained for less than the fair market value. Nominal gifts may not exceed \$50 USD in fair market value.
- G. **Family member.** An individual's current spouse or partner, child or stepchild, sibling or stepsibling, parent or stepparent, any other dependent or person living in the household, aunts, uncles, nieces, or nephews.
- H. **Peer evaluator.** Any individual who evaluates an institution and proposes an accreditation action. Peer evaluator is not intended to include a Commissioner serving in an official Commissioner capacity on a committee or the Commission.
- I. **Public representative.** Commissioner who is not an employee, governing board member, owner, shareholder, or consultant of an institution accredited by the Commission or a candidate for accreditation status by the Commission; who is not a member of any trade association or membership organization related to, affiliated with, or associated with the Commission; and who is not a spouse, parent, child or sibling of any of the above.

J. **Related entity.** An entity, regardless of form, that is legally distinct from the institution but has a relationship, connection, or interdependency with the institution. Examples include but are not limited to (1) an individual, partnership, corporation, other entity, layer or group of ownership, or institution of higher education that exercises legal authority or control over the institution; (2) a subsidiary, controlled or supporting organization, other entity, or another institution of higher education for which the institution exercises legal authority or control over and thereby assumes liability; (3) an entity that has a voting interest and/or is granted a certain number of seats or representation on the institution's governing body such as a funding or religious sponsor; (4) a public college or university system administration or board which has legislative authority from an individual state, territory, or federal district over a group of institutions, or (5) a private college or university system administration or board which has legal authority over a group of institutions. Alumni associations, fundraising organizations, and teaching hospitals are not considered related entities. Local, county, and state legislatures, other accreditors, local advisory boards, and government agencies or jurisdictions are not considered related entities. External non-accredited entities with which the institution has a written contract for the provision of limited student services or programs are not considered related entities.

Number: P6.2

Version: 2026-02-02 Public Comment

Effective: Proposed July 1, 2026

Approved: To Be Approved by Commission (June 2026)

Initial Approval: 2004; June 3, 2017 (Membership);

Previously issued:

Revisions: June 23, 2011; October 2012; June 3, 2017; April 1, 2026

Related Documents: *The Middle States Commission on Higher Education Bylaws; Peer Evaluators Policy and Procedures*;

Federal Regulations: 34 CFR The Secretary's Recognition of Accrediting Agencies, Part 602.15

Conflicts of Interest Procedures

Effective Date: Proposed July 1, 2026

Version: 2026-02-02 Public Comment

New Procedures

Contents

- I. Purpose
- II. Definition of Conflicts of Interest
- III. Procedures for Disclosure of Conflicts of Interest
- IV. Procedures for Consideration of Conflicts of Interest in Assignments
- V. Additional Requirements for Financial Conflicts of Interest
- VI. Additional Requirements for Commissioners
- VII. Additional Requirements for Commission Staff
- VIII. Additional Requirements for Peer Evaluators
- IX. Definitions

I. Purpose

The Mid-Atlantic Region Commission on Higher Education (MARCHE), doing business as the Middle States Commission on Higher Education (MSCHE or the Commission), seeks to ensure objectivity in the accreditation process by maintaining integrity and credibility in accreditation and policy making processes. The avoidance of actual conflicts, potential conflicts, or even the appearance of conflicts of interest in the Commission's accreditation actions is crucial to upholding integrity and credibility in these processes. A conflict of interest occurs when an individual is unable or may be *perceived* to be unable to fulfill their role with the Commission in an objective and independent manner and as outlined in applicable law and regulations. This purpose of this policy is to summarize the conflicts of interest standards that govern service to the Commission and define those areas that the Commission considers an actual or potential conflict of interest.

II. Definition of Conflicts of Interest

The Commission holds the following circumstances to represent actual or potential conflicts of interest and expects any individual acting on behalf of the Commission to disclose the conflict of interest pursuant to the instructions in these procedures and decline the invitation to serve from the Commission if any of the following conditions exist:

1. **System or Related Entity:** The individual holds a significant professional relationship in or with an institution that is currently part of a larger public or private system or has an arrangement with a related entity.
2. **Enrolled Student or Alumni:** The individual or his or her family member is an applicant or enrolled student, or an alumnus or alumna of the institution, or has been awarded an

honorary degree by the institution.

3. **Governing Body or Board Member:** The individual serves as a member of the governing body or board of the institution or the individual has a family member who is serving as a member of the governing body or board at the institution.
4. **Employment:** The individual or his or her family member has been employed by the institution at any point in their career or has been a candidate for employment at the evaluated institution within the past two years.
5. **Personal, Business, or Significant Financial Interest:** The individual has a personal, business, consultative, or other interest in or relationship with the institution under review and consideration, or with its affiliates, partners, or other constituents or interested parties, that could affect his or her objectivity, including but not limited to:
 - a. The individual has served as a consultant on matters related to or resulting from MSCHE accreditation activities within the previous year;
 - b. The individual or the individual's institution has a material interest in a particular accreditation outcome based on a significant business or other fiduciary agreement (excluding routine articulation or similar inter-institutional agreements); or
 - c. The individual or his or her family members hold shares of stock (excluding shares held indirectly through mutual funds, insurance policies or blind trusts) in an applicant, candidate, or accredited institution, or their related entity.
6. **Affiliation with the Commission:** The individual has served as a Commissioner or Commission employee within the previous year or has a family member who is a Commissioner, Commission employee, or is currently a candidate for employment at the Commission. This provision applies to eligibility for service as a peer evaluator.
7. **Other Perceived Conflict:** The Commission reserves the right to determine if any other circumstance is a conflict of interest because it has the appearance of or could be perceived a conflict of interest. If in the individual's judgement it could have the appearance of or could be perceived as a conflict of interest, the individual should disclose it.

For purposes of this policy, a family member is defined as a current spouse or partner, child or stepchild, sibling or stepsibling, parent or stepparent, any other dependent or person living in the household, and aunts, uncles, nieces, or nephews.

The Commission considers an individual's family member's employment at the Commission to be a conflict of interest for Commissioners. Individuals whose immediate family members are employed by the Commission are not eligible to serve as Commissioners. If an individual's family member becomes employed by the Commission during the Commissioner's service, the individual must resign from their role as Commissioner.

III. Procedures for Disclosure of Conflicts of Interest

- A. In accordance with the Commission's *Peer Evaluators Policy and Procedures*, an individual who applies to be a peer evaluator must complete the Evaluator Data Form (EDF). Upon acceptance into the Commission's pool of peer evaluators, that individual must complete the *Conflicts of Interest Disclosure Form* in the secure MSCHE (volunteer) portal.
- B. Commission representatives must review and update the *Conflicts of Interest Disclosure Form* in the secure MSCHE portal on at least an annual basis and update their conflicts when a relevant change in circumstances occurs.
- C. Commission representatives must review and update their *Conflicts of Interest Disclosure Form* upon receiving an invitation to an assignment and verify that they have no conflicts with that specific assignment.
- D. The Commission will send reminders to Commission representatives to review and update the *Conflicts of Interest Disclosure Form* in the secure MSCHE portal on an annual basis.
- E. The Commission staff will use the information provided in the annual *Conflicts of Interest Disclosure Form* to make appropriate assignments pursuant to the *Conflicts of Interest Policy and Procedures*. The institution is provided the opportunity to review a proposed roster and affirm the team of peer evaluators. The Commission will reassign a peer evaluator if a conflict of interest, as defined in this policy and procedures, is identified.

IV. Procedures for Consideration of Conflicts of Interest in Assignments

- A. The Commission will take measures to assure that no Commission representative will be assigned to review an institution for which they have disclosed a conflict of interest.

- B. The Commission will take measures to assure that no Commission employee will be assigned as staff liaison to an institution with which the individual has disclosed a conflict or appearance of a conflict.
 - 1. If a conflict arises after an assignment is made, the Commission will reassign the institution to a different employee.
 - 2. In making assignments, the Commission 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 evaluation process. For example, a family member of the Commission employee is the accountant for the institution.
- C. If an unanticipated actual or perceived conflict of interest develops, the Commission representative should immediately report the conflict. The President of the Commission may, at his or her discretion, bring the matter to the Executive Committee for specific waivers or other consideration.
- D. If a conflict arises after an assignment is made, the Commission will review the nature of the conflict and either remove the individual or the institution will be given the right to refuse or accept the individual.

V. Additional Requirements for Financial Conflicts of Interest

Commission representatives may obtain information in the course of accreditation activities that could lead to personal financial gain. In addition to the disclosure of financial conflicts of interest, the Commission has additional expectations for the conduct of Commission representatives when they have a significant business or financial interest.

- A. Commission representatives are prohibited from using information obtained from, by, and for accreditation activities for trading stock of publicly held companies or financial gain.
- B. Commission representatives who have non-public information about any issuer of securities of a public company, including without limitation because of Commission matters (including without limitation proposed actions about individual applicant, accredited or candidate institutions), may *not* personally or on behalf of others buy or sell any security of such issuer, disclose or use such information until it is public or use it for personal gain or the gain of others, or for any other purpose that would be or appear to be inappropriate use of such information.
- C. Commission representatives who have individual or institutional material interest in a particular accreditation action based on a significant business or other fiduciary agreement (excluding routine articulation or similar inter-institutional agreements) will recuse themselves from deliberations, discussions, or assignments related to the institution under review.

VI. Additional Requirements for Commissioners

The Commission is comprised of administrative, academic, and public representatives as defined in the *Mid-Atlantic Region Commission on Higher Education Amended and Re-stated Bylaws* and required by 34 CFR § 602.14(b)(2). Administrative, academic, and public representative are defined in Section IX. Definitions. Commissioners represent the Commission and must adhere to all of the conditions as set forth in these procedures. In addition to the standards for conflict of interest articulated in these procedures, individuals who serve as Commissioners are expected to adhere to the highest standard of integrity, credibility, and codes of good conduct.

- A. Commissioners must adhere to the Commission's *Conflicts of Interest Policy for Corporate Actions* in addition to these procedures.
- B. Commissioners are required to submit disclosure forms under both policies at the commencement of their service as a Commissioner, annually thereafter, and immediately upon the occurrence of any relevant change in circumstances as outlined in the aforementioned policies.
 1. Commissioners are expected to review agendas in advance of committee or Commission meetings to identify potential conflicts.
 2. Commissioners will ensure that all identified conflicts of interest are accurately disclosed and up-to-date in the secure MSCHE portal prior to any meeting.
 3. During meetings, Commissioners must disclose any potential conflicts of interest that may not previously have been reported and recuse themselves from any discussion, deliberation, or decision making regarding the institution.
- C. The Commission staff will verify that nominees identified as a potential public representative are eligible for this role and meet the definition of public representative prior to their election as a Commissioner. Public representative is defined in Section IX. Definitions.
 1. The individual designated as a public representative must certify that he/she meets the definition of a public representative by completing the *Certification of Eligibility to Serve as a Public Member of the Commission* form.
 2. Individuals serving as public representatives on the Commission must immediately disclose any changes to their employment or professional affiliations that may impact their eligibility to serve as a member of the public.
 3. If such a change is deemed to change their eligibility, the Commission may ask the individual to step down and/or designate an alternate public Commissioner to ensure the percentage required in federal regulation 34 CFR § 602.14(b)(2) is met.
- D. Any Commissioner who served as a team member for an institution under review must formally abstain in the voting process while the Commission is taking formal action regarding the institution related to the visit for which the Commissioner served as a team member; however, the Commissioner may answer questions that are directed to them specifically by another Commissioner.

- E. Commissioners will not use their position for self-dealing, usurping corporate opportunities and receiving improper personal benefits.
- F. Commissioners may not be employed by the Middle States Commission on Higher Education within a one-year period following the end of their tenure as a Commissioner.
- G. Commissioners may be invited to serve as consultants on business or operational projects at the discretion and invitation of the President of the Commission.
 - 1. Commissioners providing consulting services to the Commission will sign and submit attestation disclosing their involvement with the project and affirming their work will be free of undue influence.
 - 2. Commissioners serving as consultants are not permitted to have any role in decision-making for any project they have worked on.
 - 3. Attestations will be processed and approved by the President of the Commission.
 - 4. The Commission will store and maintain this documentation in alignment with its *Maintenance and Retention of Commission Records Policy and Procedures*.
- H. The acceptance of personal gifts from institutions or external organizations given to Commissioners may create the appearance of a conflict of interest. For this reason, Commissioners must not solicit personal gifts and may not accept gifts in excess of \$50 (USD) in fair market value.

VII. Additional Requirements for Commission Staff

Commission staff are considered representatives of the Commission and must adhere to all of the conditions as set forth in these procedures, including disclosure of conflicts of interest.

Commission staff are considered Commission representatives and have additional requirements in order to adhere to the highest standard of integrity, credibility, and codes of good conduct.

- A. The Commission will not assign Commission staff to serve as Commission staff liaison to an institution with which they have a conflict of interest.
- B. Commission staff are not permitted to accept honorary degrees or other honors or awards from applicant, accredited or candidate institutions during the period of their employment with the Commission.
- C. Except in exceptional circumstances and subject to the approval of the Commission's President or the approval of the Executive Committee for the president, Commission staff are not permitted to participate as a representative of the Middle States Commission on Higher Education in ceremonial occasions at a MSCHE applicant, candidate, or accredited institutions.
- D. Commission staff may not serve as voting members of a governing body of an institution accredited by the Commission or a candidate for accreditation by the Commission
- E. While Commission staff may accompany teams and observe visits, they do not serve as

peer evaluators and do not participate in the accreditation decision-making process. The role of staff is to provide guidance and advice related to Commission policy and procedures.

- F. Commission staff may not serve as consultants, adjunct, or faculty members to MSCHE accredited, candidate, or applicant institutions. See *MSCHE Employee Handbook*.
 - 1. Any professional consulting arrangement, private consulting, or other employment arrangements between Commission staff and outside organizations or institutions may be made only with the approval of the employee's supervisor and the President of the Commission. For the President, such arrangements must be approved by the Executive Committee.
 - 2. Commission staff may serve as a consultant only to institutions or organizations that are not applicant, candidate, or accredited institutions that are considered members of the Commission.
 - 3. Commission staff must complete that work on their own time (i.e., vacation, evening, or weekend time).
- G. If the Commission or committee has reasonable cause to believe that an employee has failed to disclose actual or possible conflicts of interest, the president will take appropriate disciplinary and corrective action.
- H. The acceptance of personal gifts from institutions or external organizations given to Commission staff may create the appearance of a conflict of interest. For this reason, Commission staff must not solicit personal gifts and may not accept gifts in excess of \$50 (USD) in fair market value.

VIII. Additional Requirements for Peer Evaluators

- A. For one year following an assignment to an institution, peer evaluators should not serve as paid consultants or accept permanent employment at that institution.
- B. Peer evaluators will continue to honor and maintain confidentiality regarding accreditation activities that they have participated in after their assignment has concluded in accordance with the Commission's *Communication in the Accreditation Process Policy and Procedures*.
- C. Peer evaluators will not communicate with the institution regarding accreditation activities upon the conclusion of the activity.
- D. The acceptance of personal gifts from institutions or external organizations given to peer evaluators may create the appearance of a conflict of interest. For this reason, peer evaluators must not solicit personal gifts and may not accept gifts in excess of \$50 (USD) in fair market value.

E. The exchange or receipt of money for any purpose between peer evaluators and institutions is expressly prohibited. Travel expenses associated with a visit will be reimbursed by the Commission in accordance with the Commission's *Travel Policy and Procedures*.

IX. Definitions

A. **Academic personnel.** An individual who is currently or recently engaged within the past five years in a significant manner in postsecondary teaching and/or research, or other appropriate professionals with sufficient responsibility to the institution to assure the continuity and coherence of the institution's educational programs (*definition in Mid-Atlantic Region Commission on Higher Education Amended and Re-stated Bylaws*)

B. **Administrative personnel.** An individual who is currently or recently directly engaged within the past five years in a significant manner in postsecondary program or institutional administration (definition in MARCHE Bylaws).

C. **Commission representatives.** Any individual who represents or serves the Commission, including but not limited to peer evaluators, Commission staff, and Commissioners.

D. **Conflict(s) of interest.** Occurs when an individual is unable or may be perceived to be unable to fulfill their role with the Commission in an objective and independent manner and as outlined in applicable law and regulations. Conflicts of interest may include potential, actual, or perceived conflicts of interest as defined in the Commission's *Conflicts of Interest Policy and Procedures*.

E. **Fair market value.** The value of property as determined by the marketplace (or objective purchasers) rather than as determined by a subjective individual.

F. **Gifts.** Goods or services that may be tangible or intangible and have monetary value obtained for less than the fair market value. Nominal gifts may not exceed \$50 USD in fair market value.

G. **Family member.** An individual's current spouse or partner, child or stepchild, sibling or stepsibling, parent or stepparent, any other dependent or person living in the household, and aunts, uncles, nieces, or nephews

H. **Peer evaluator.** Any individual who evaluates an institution and proposes an accreditation action. Peer evaluator is not intended to include a Commissioner serving in an official Commissioner capacity on a committee or the Commission.

I. **Public representative.** An individual who is not currently or for the previous five years an employee, governing board member, owner, shareholder, or consultant of an institution who is not a member of any trade association or membership organization related to, affiliated with, or associated with the Commission; and who is not a spouse,

parent, child, or sibling of any of the above (*federal definition in 34 CFR § 602.3 and Mid-Atlantic Region Commission on Higher Education Amended and Re-stated Bylaws*).

J. **Related entity.** An entity, regardless of form, that is legally distinct from the institution but has a relationship, connection, or interdependency with the institution. Examples include but are not limited to (1) an individual, partnership, corporation, other entity, layer or group of ownership, or institution of higher education that exercises legal authority or control over the institution; (2) a subsidiary, controlled or supporting organization, other entity, or another institution of higher education for which the institution exercises legal authority or control over and thereby assumes liability; (3) an entity that has a voting interest and/or is granted a certain number of seats or representation on the institution's governing body such as a funding or religious sponsor; (4) a public college or university system administration or board which has legislative authority from an individual state, territory, or federal district over a group of institutions, or (5) a private college or university system administration or board which has legal authority over a group of institutions. Alumni associations, fundraising organizations, and teaching hospitals are not considered related entities. Local, county, and state legislatures, other accreditors, local advisory boards, and government agencies or jurisdictions are not considered related entities. External non-accredited entities with which the institution has a written contract for the provision of limited student services or programs are not considered related entities.

Number: P6.2

Version: 2026-02-02 Public Comment

Effective: Proposed July 1, 2026

Approved: To Be Approved by Commission (June 2026)

Initial Approval: 2004; June 3, 2017 (Membership)

Previously issued:

Revisions: June 23, 2011; October 2012; June 3, 2017; April 1, 2026

Related Documents: *Conflict of Interest Policy; Maintenance and Retention of Commission Records Policy and Procedures; Mid-Atlantic Region Commission on Higher Education Amended and Re-stated Bylaws; MSCHE Employee Handbook; Peer Evaluators Policy and Procedures; Travel Policy and Procedures;*

Federal Regulations: 34 CFR The Secretary's Recognition of Accrediting Agencies, Part 602.15