**VOLUNTEER APPLICATION**

Thank you for your consideration and interest in working with ACHENA!

**Directions** Please EMAIL ALL items at one time to: [info@achena.org](mailto:info@achena.org)

Nominees or those wishing to apply for consideration shall submit:

1. A brief letter of intent stating your interest in working with ACHENA

2. A current C.V. or resume including contact information for two references (letters of recommendation are optional)

3. Volunteer Background Data Form (last page)

**Information**

There are various opportunities to serve ACHENA (e.g. as a Commissioner or Advisor, a Peer Reviewer or a committee volunteer only). All ACHENA Volunteers are expected to accept and subscribe to the defined purposes of accreditation, and to support and uphold the ACHENA’s mission, including Eligibility Requirements, Accreditation Standards, and Commission policies, and processes. Volunteer terms-of-service are flexible, but we encourage volunteers to commit to one year, if possible. Only Commissioner board members appointments serve for a three-year term. Appointments are effective immediately upon election results. A Commissioner may normally serve a maximum of two three-year terms. It is ACHENA’s policy to seek diverse, balanced and unbiased membership on the Commission.

**Definition of a Public Member (who will serve as a Commissioner)**

A representative of the public means a person who is *not* 1) a homeopath and does not derive any income from homeopathy related sources; 2) An employee of ACHENA or a member of the governing board, a current owner/shareholder of, or consultant to, an institution or program that either is pre-accredited by ACHENA or has applied for pre/accreditation; 3) a spouse, parent, child, or sibling of an individual identified in 1) or 2). Public Members must maintain this eligibility status during their three-year-term, however if that status changes, they may finish their term as a non-public member Commissioner. Public members are elected based on the criteria and procedures stated in the ACHENA *Operations Manual.*

**Purposes of ACHENA**

ACHENA encourages and supports institutional development and improvement through self-evaluation and periodic evaluation by qualified peer professionals. The purposes of accreditation shall be to oversee the voluntary evaluation of homeopathic institution applicants to assure the educational community, the general public, and other organizations and agencies that the applicant for accreditation has clearly defined objectives appropriate to higher education; has established conditions under which their achievement can reasonably be expected, measured and assessed for completion; appears in fact to be accomplishing them substantially; is so organized, staffed, and supported that it can be expected to continue to do so; and demonstrates that it meets ACHENA’s community-defined standards of homeopathic education.

*(volunteer application cont.)*

**Volunteer Qualifications**

* ***Ability to Conceptualize*** Since issues related to accreditation are not easily reduced to simple terms, Volunteers need the ability to think abstractly, both in terms of present and future certification plans. Strong written and verbal communication skills are an asset.
* ***Broad Perspective*** Volunteersmust be able to view the entire accreditation process as a whole (as applicable to volunteer role) and understand and respect that decisions made in one area have an impact elsewhere.
* ***Objectivity*** Volunteersmust exercise open-minded, flexible thinking and independent judgment necessary internal and external decision-making authority. Volunteers must respect opinions that differ from their own and exercise tolerance in allowing everyone to express their point of view.
* ***Commitment*** Volunteersmust be committed to leading the homeopathic community, as evidenced by past activities and accomplishments or by strong interest in helping to advance the field of homeopathy. Courage of convictions and enthusiasm are necessary to cope with inevitable change, while experience and wisdom of those who have encountered similar problems over the years are likewise essential.
* ***Conflict of Interest*** Volunteers must maintain transparency and uphold their written pledge to avoid conflicts of interests with regard to the homeopathic stakeholders ACHENA serves through its organizational mission and activities. All Volunteers shall consistently work to understand the potential personal, financial, political or administrative conflicts of interest in their written and verbal interactions with homeopathic schools and administrators, homeopathic students and practitioners or the public who may have a stake in ACHENA’s mission and goals.
* ***Teamwork*** Since much of ACHENA’s work is conducted within committee structures, Volunteers must demonstrate willingness and ability to work as part of a team.
* ***Diversity*** As a whole, Volunteersought to possess diverse skills such as higher education instruction or administration, financial administration or budgeting, program planning and evaluation, qualitative and quantitative data processing and interpretation, public relations and marketing, writing, legal and/or organizational skills. All Volunteerscontribute collectively to demographic diversity by region, current position and education.

*(volunteer application cont.)*

**VOLUNTEER BACKGROUND DATA FORM**

Name \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Cell phone \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Email \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Current Professional Employment and/or Position \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**1. Please check one or more area(s) of interest in serving ACHENA**

\_\_\_\_\_ Commissioner \_\_\_\_\_ Peer Reviewer \_\_\_\_\_ Advisor \_\_\_\_\_ Committee volunteer only

**2. Please check any standing committee(s) that interest you**

\_\_\_\_\_ Standards \_\_\_\_\_ Continuing Professional Development \_\_\_\_\_ Finance \_\_\_\_\_ Nominations and Outreach \_\_\_\_\_

**3. Please check the area of experience you may have in the following fields of education**

\_\_\_\_\_ Institutional Administration, Evaluation and/or Accreditation

When \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Where \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Describe \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_ Academic/Faculty/Instructor

When \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Where \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Describe \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_ Accredited Schools or Institutions

When \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Where \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Describe \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_ Non-accredited or Independent Schools or Institutions

When \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Where \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Describe \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**The following Disclosure Forms are provided for your reference and will required to be signed once you have been accepted as a Volunteer and before attending any internal ACHENA activities.**

##### **ACHENA Commitment Form**

Updated February 2020

**The following duties and code of conduct apply to all members of ACHENA; commissioners, peer reviewers, committee/advisory members, and all other volunteer and staff positions.**

I will:

* Regularly attend applicable meetings according to my role and provide advance notice if I am not able to attend. I understand that missing three consecutive meetings without advance notice may affect my position with ACHENA;
* Review the agenda and supporting materials prior to meetings;
* Serve on committees and take on special assignments as needed and available;
* Remain informed about ACHENA’s mission, policies and activities;
* Provide support and advice to the staff but avoid interfering in management activities;
* Suggest nominees and participate in volunteer recruitment;
* Support ACHENA by representing ACHENA in the community, with schools, other homeopathic organizations, governmental and non-governmental organizations with which ACHENA may interact.

**Commissioner / Board Member Code of conduct**

As an ACHENA member I understand that I have duties of care, loyalty, and obedience to the ACHENA.

* The duty of care is the duty to pay attention to ACHENA—to monitor its activities, see that its mission is being accomplished, and guard its financial resources;
* The duty of loyalty is the duty to avoid conflicts of interest; and
* The duty of obedience is to carry out the purposes of ACHENA and to comply with the law.

**As an ACHENA member I agree to:**

* Act with honesty and integrity;
* Support in a positive manner all actions taken by the commission even when I am in a minority position on such actions. I recognize that decisions of the commission can be made only by a majority vote at a board meeting and respect the majority decisions of the commission, while retaining the right to seek changes through ethical and constructive channels;
* Participate in self-evaluation programs, and organizational development workshops, seminars, and other educational events that enhance my skills as an ACHENA member;
* Respect the confidentiality of ACHENA business and communications, including information about pending ACHENA policy decisions, school eligibility and accreditation decisions, public comments received in accordance with ACHENA’s public comment process; ACHENA deliberations, and other issues which a reasonably prudent member would recognize as confidential;
* Respect as confidential and never use for my personal benefit any information obtained in the course of conducting homeopathy school eligibility or accreditation decision-

*(commitment form cont.)*

making, including information about curriculum, teaching methods, financial standing, marketing strategies, internal school business proceedings, etc;

* Exercise my authority as a member of ACHENA only when acting in a meeting with the full board or when appointed by the board;
* Work with and respect the opinions of my peers who serve ACHENA, and leave my personal prejudices out of all board and committee discussions;
* Always act for the good of ACHENA and those served by ACHENA;
* Represent ACHENA in a positive and supportive manner at all times;
* Observe the parliamentary procedures and display courteous conduct in all board and committee meetings;
* Accept my responsibility for providing oversight of ACHENA’s financial condition;
* Abide by these operating procedures.

Print Name:

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Signature Date

**ACHENA Conflict of Interest Disclosure Procedures**

**I. Application of Policy**

This policy is intended to supplement, but not replace, federal and state laws governing conflicts of interest applicable to nonprofit corporations. It applies to all members of ACHENA; commissioners, peer reviewers, committee/advisory members, and all other volunteer and staff positions who are hereinafter referred to as "interested parties."

**II. Definition of Conflict of Interest**

A conflict of interest may exist when the personal interests or concerns of an individual ACHENA member, his or her family member or other person significant to the member, may be seen as competing with the interests or concerns of ACHENA. Situations that raise concerns regarding conflict of interest include, but are not limited to, the following:

A. Financial Interests - A conflict may exist where an ACHENA member, or someone close to him or her, may directly or indirectly benefit or profit as a result of a decision, policy or transaction made by ACHENA. Examples include situations where:

* ACHENA contracts to purchase/lease goods, services, or property from an interested party;
* ACHENA offers employment to an interested party, other than a person who is already employed by ACHENA;
* An interested party uses their relationship with an organization associated with ACHENA in some fashion to obtain employment, a contract or other benefit;
* An interested party is provided use of the facilities, property, or services of ACHENA in a manner that would not be available to other community members;
* ACHENA adopts a policy that specifically creates a financial benefit to an interested party.

B. Accreditation Interests – A conflict may exist where an ACHENA member or someone close to him or her, may directly or indirectly be the subject of a peer review site visit, eligibility determination or accreditation determination. Examples include situations where:

* An ACHENA member is the owner, director, administrator, faculty or consultant to an institution or program which is under consideration for eligibility or accreditation;
* An ACHENA member is a family member, close associate or in a current or past relationship with an owner, director, administrator, faculty or consultant associated with an institution or program which is under consideration for eligibility or accreditation;
* An ACHENA member who is the owner, administrator, faculty or consultant of an institution of program which has a tangible, demonstrable completive relationship with another school which is under consideration for eligibility or accreditation.

*(conflict of interest procedures cont.)*

Conflict of interest in accreditation decision-making consistent with the first two bullets above, shall be considered immediate grounds for recusing the interested parties from any input or vote regarding the accreditation decision. For potential conflicts of interest such as outlined in the third bullet, a conflict of interest exists only when the Board of Directors decides there is a conflict.

C. Other Interests - A conflict also may exist where an interested party obtains a non-financial benefit or advantage that he/she would not have obtained absent his/her relationship with ACHENA. Examples include where:

* An interested party seeks to make use of confidential information obtained from ACHENA or an ACHENA client for his/her own benefit (not necessarily financial);
* ACHENA adopts a policy that provides a significant nonfinancial benefit to an interested party.

**III. Disclosure of Potential Conflicts of Interest**

An interested party is under a continuing obligation to disclose any potential conflict of interest as soon as it is known or reasonably should be known.

* All ACHENA members complete an Affirmation of Compliance form when they join the board or staff and annually thereafter.
* Any interested party completes the Disclosure of Potential Conflict of Interest Statement to disclose any potential conflicts of interest.

Disclosure Statements and Affirmations of Compliance will be submitted as follows:

* Commissioners’ disclosure statements will be provided to the ACHENA president or vice president;
* The presidents’ disclosure statements shall be provided to the secretary of the board;
* In the case of staff, peer reviewers and other volunteers, the disclosure statements shall be provided to the executive director;
* In the case of the executive director, the disclosure statement shall be provided to any ACHENA officer.

The secretary of the board or the person designated by the board as the reviewing official is responsible for bringing potential conflicts to the attention of the board or the executive director. The secretary of the board shall file copies of all disclosure statements with the official corporate records of ACHENA.

**IV. Procedures for Review of Potential Conflicts**

Whenever there is reason to believe that a potential conflict of interest exists between ACHENA and a commissioner/ board member or the executive director, the board shall determine the appropriate response. The designated reviewing official has a responsibility to bring a potential

*(conflict of interest procedures cont.)*

conflict of interest to the attention of the board for action at the next regular meeting of the board or during a special meeting called specifically to review the potential conflict of interest. ACHENA shall refrain from acting until such time as the proposed action, policy or transaction has been approved by the disinterested members of the board.

Whenever there is reason to believe that a potential conflict of interest exists between ACHENA and a consultant/volunteer/peer reviewer, the executive director shall determine the appropriate response. The executive director shall report to the board chair the results of any review and the action taken. The chair shall determine whether any further board review or action is required.

**V. Procedures for Addressing Conflicts of Interest**

The following procedures shall apply:

An interested party who has a potential conflict of interest with respect to a proposed action, policy or transaction of the corporation shall not participate in any way in, or be present during, the deliberations and decision-making vote of ACHENA*.* However, the interested party shall have an opportunity to provide factual information about the proposed conflict and/or action, policy or transaction. Also, the board may request that the interested party be available to answer questions.

The disinterested members of the board may approve the proposed action, policy or transaction upon finding that it is in the best interests of ACHENA. The board shall consider whether the terms of the proposed action, transaction or policy are fair and reasonable to ACHENA and whether it would be possible, with reasonable effort, to find a more advantageous arrangement with a disinterested party.

Approval by the disinterested members of the board shall be by vote of a majority of directors in attendance at a meeting at which a quorum is present. An interested party shall not be counted for purposes of determining whether a quorum is present, or for purposes of determining what constitutes a majority vote of directors in attendance.

The minutes of the meeting shall reflect that the conflict disclosure was made to the board, the vote taken and, where applicable, the abstention from voting and participation by the interested party. Whenever possible, the minutes should frame the decision of the board in such a way to provide guidance for consideration of future conflict of interest situations.

**VI. Violations of Conflict of Interest Policy**

If the board or executive director (for consultants/volunteers) has reason to believe that an interested party has failed to disclose a potential conflict of interest, it shall inform the person of the basis for such belief and allow the person an opportunity to explain the alleged failure to disclose.

*(conflict of interest procedures cont.)*

If the board or executive director (for consultant/volunteers) decides that the interested party has in fact failed to disclose a possible conflict of interest, the board shall take such disciplinary and corrective action as the board shall determine.

**Potential Conflict of Interest Disclosure Statement**

Please complete the questionnaire below, indicating any potential conflicts of interest. If you answer "yes" to any of the questions, please provide a written description of the details of the specific action, policy or transaction in the space allowed. Attach additional sheets as needed.

A conflict may exist where an interested party directly or indirectly benefits or profits as a result of a decision, policy or transaction made by ACHENA. The interested party would not have obtained this benefit were it not for his/her relationship with ACHENA.

|  |  |
| --- | --- |
|  | * If you are a homeopathy school owner, faculty, administrator, staff or consultant for a school which is under review for a site visit, eligibility or accreditation decision, you understand that you will not participate as a peer reviewer and will abstain from any decision-making/ voting relative to such. * Has ACHENA proposed to contract or contracted to purchase or lease goods, services, or property from you or from any of your relatives or associates? |
|  | * Board members/ED only: Has ACHENA offered employment to you or to any of your relatives or associates? |
|  | * Have you used your relationship with ACHENA to obtain a contract, employment for yourself or any of your relatives or associates, from a person or entity that does business with ACHENA? |
|  | * Have you or any of your relatives been provided use of the facilities, property, or services of ACHENA in a way that is not available to others who benefit from the organization’s services? |
|  | * Have you, a relative or an associate been in a position to benefit financially from an action, policy or transaction made by ACHENA? |
|  | * Other issues or situations not addressed above \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_

Name (Please print)              Signature                                 Date

**Conflict of Interest Affirmation of Compliance**

I have received and carefully read the Conflict of Interest Policy for ACHENA members, the executive director and managers. I have considered not only the literal expression of the policy, but also its intent.

By signing this affirmation of compliance, I hereby affirm that I understand and agree to comply with the Conflict of Interest Policy.

I further understand that ACHENA is a nonprofit organization and that in order to maintain its federal tax exemption it must engage primarily in activities that accomplish one or more of its tax-exempt purposes without personal inurement or benefit by board members, consultants/volunteers or staff (other than by salary).

\_\_\_\_ I hereby state that I do not have any conflict of interest, financial or otherwise that may be seen as competing with the interests of ACHENA, nor do any of my relatives or associates have such a potential conflict of interest.

\_\_\_\_\_ I hereby disclose any on-going conflict of interest below and will take the following steps to address this conflict of interest.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

If any situation should arise in the future that I think may involve me in a conflict of interest, I will promptly and fully disclose in writing the circumstances to the Chair of the Board of Directors or to the Executive Director, as applicable.

I further certify that the information set forth in the Disclosure Statement and attachments, if any, is true and correct to the best of my knowledge, information and belief.

Name (Please print) \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Signature \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_    Date \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Whistleblower Protection Policy**

ACHENA requires all Commissioners, volunteers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of ACHENA, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

**Reporting Responsibility**

This Whistleblower Policy is intended to encourage and enable those associated with ACHENA to raise serious concerns internally to address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report concerns about violations of ACHENA’s code of ethics or suspected violations of law or regulations that govern ACHENA’s operations.

**No Retaliation**

It is contrary to the values of ACHENA for anyone to retaliate against any board member, officer, employee or volunteer who in good faith reports an ethics violation, or a suspected violation of law. Such complaints of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of ACHENA shall be protected. A board member, officer, employee or volunteer who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment, volunteer, or member status within the organization.

**Reporting Procedure**

ACHENA has an open-door policy. Board members, officers, employees and volunteers are encouraged to share their questions, concerns, suggestions or complaints with their respective supervisor or committee chair. If you are not comfortable speaking with your supervisor or committee chair, or you are not satisfied with the response, you are encouraged to speak with the Vice President or another board member. Supervisors and committee chairs are required to report complaints or concerns about suspected ethical and legal violations in writing to ACHENA’s Executive Committee, who has the responsibility to investigate all reported complaints. Concerns or complaints may also be submitted in writing directly to a supervisor, committee chair, the Vice President or the Executive Committee.

**The Executive Committee**

This committee is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Executive Committee will advise the full Board of Directors of all complaints and their resolution and will report, at least annually, to the Treasurer on compliance activity relating to accounting or alleged financial improprieties.

*(whistle blower policy cont.)*

**Accounting and Auditing Matters**

ACHENA’s Executive Committee shall immediately notify the Treasurer and Finance Committee of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

**Acting in Good Faith**

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

**Confidentiality**

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

**Handling of Reported Violations**

The Executive Committee will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.

Name: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date: \_\_\_\_\_\_\_\_\_\_\_\_

Signature:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  
  
*Policy approved by the Board of Directors on January 23, 2020*