



Conflict of Interest

Updated May 2026

Conflict of interest refers to any situation in which ACHENA Commissioners, Support Team Members, Advisors or Committee Members stand to gain materially from their association with ACHENA. ACHENA takes the following steps to minimize potential conflict of interest, over and above what is outlined in its *Bylaws and Policies & Procedures Manual*:

- ACHENA limits, when possible, the number of *Commissioners* serving the board who concurrently represent a single accredited institution or program.
- ACHENA Commissioners, Support Team Members, Advisors or Committee Members shall remain independent of an accredited institution or program at the time of their formal recruitment and tenure. Full disclosure of any anticipated or actual conflict shall be disclosed and reflected in Executive Committee and/or Commission Board minutes.
- ACHENA Commissioners, Peer Reviewers, Site Visitors, Committee Volunteers, Advisors and/or Staff who have a conflict of interest with a specific institution / program cannot be assigned to nor participate in any written and/or verbal assessments or review processes of any accreditation-related matter, for example eligibility packet reviews, self-study report reviews, site visits, annual reports, etc. Conversely, school owners, administrators, faculty and/or student stakeholders may not be assigned nor participate.
- ACHENA Advisors are trained to act as third-party reviewers in order to reduce potential or actual conflict of interest in the accreditation decision-making process whenever possible.
- Every meeting of the Board of Commissioners and Executive Committee begins with a request for participants to declare any conflict of interest in relation to any agenda items. They must recuse themselves from the meeting while that agenda item(s) is discussed and/or voted upon. Voting members may share their concern regarding a potential conflict of interest of other voting members prior to the beginning of any discussion.
- All Commissioners, Peers Reviewers, Site Visitors, Committee Volunteers, Advisors and Support Team receive instruction in ACHENA's Code of Ethics and must sign an acknowledgement of ACHENA's Conflict of Interest, Confidentiality and Whistleblower Policy and Procedures. They annually renew these agreements and are regularly informed and updated on their fellow members' conflicts of interest. Signed statements are maintained in ACHENA's business files.

- During any assessment and review process for a specific institution/program, verbal or written communication between ACHENA and that institution / program is channeled through Commissioners, Peer Reviewer, Site Visitors, Advisors or Support members that do not have a conflict of interest with that institution/program.
- During any assessment and review process for a specific institution / program, all working documents are electronically stored in a separate location accessible only to those directly involved with that review and without a conflict of interest with that institution/program. Discussions are held only among those directly involved with that review.

ACHENA Conflict of Interest Policy

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, Advisors, Staff and Committee Members, 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:

- 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:

- An ACHENA member is the owner, director, administrator, faculty, student, or consultant to an institution or program which is under consideration for eligibility, accreditation, or re-affirmation of 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 complete relationship with another school which is under consideration for eligibility or accreditation.

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 Commission 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:

- 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 commission or staff and annually thereafter.
- Any interested party completes the Potential Conflict of Interest Disclosure 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.
- The presidents' disclosure statements shall be provided to the treasurer of the Commission.
- In the case of peer reviewers and other volunteers, the disclosure statements shall be provided to the president.

The secretary of the commission or the person designated by the commission as the reviewing official is responsible for bringing potential conflicts to the attention of the

Commission. The secretary or person designated 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/ commission member, the commission shall determine the appropriate response.

The designated reviewing official has a responsibility to bring a potential conflict of interest to the attention of the commission for action at the next regular meeting 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 commission.

Whenever there is reason to believe that a potential conflict of interest exists between ACHENA and a consultant/volunteer/peer reviewer, the president or disinterested member shall determine the appropriate response and shall determine whether any further 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 commission may request that the interested party be available to answer questions.

The disinterested members of the commission may approve the proposed action, policy or transaction upon finding that it is in the best interests of ACHENA. The commission 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 commission shall be by vote of a majority of commissioners 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 those in attendance.

The minutes of the meeting shall reflect that the conflict disclosure was made to the commission, 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 commission in such a way to provide guidance for consideration of future conflict of interest situations.

VI. Violations of Conflict-of-Interest Policy

If the commission 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.

If the commission decides that the interested party has in fact failed to disclose a possible conflict of interest, the commission shall take such disciplinary and corrective action as the commission shall determine.

Potential Conflict of Interest Disclosure Statement

Indicate any potential conflicts of interest by checking any and all that apply. Provide a written description of the details of each specific action, policy or transaction in the insertable space below each item checked.

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 reviewer or site visitor 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?
- Commissioners 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 _____ Signature _____ Date _____

Conflict of Interest Affirmation of Compliance

I have received and carefully read the Conflict-of-Interest Policy for ACHENA. 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 in order to maintain its federal tax exemption, it must engage primarily in activities that accomplish these tax-exempt purposes without personal benefit by commissioners, advisors, staff or committee members.

_____ 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 may involve me in a conflict of interest, I will promptly and fully disclose in writing the circumstances to the President of the ACHENA Commission.

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

Print name _____

Signature _____ Date _____