ICAA CONFLICT OF INTEREST POLICY

for ICAA Chairpersons/Lead Evaluators, External Review Team Members, & School Leaders

The accreditation process is by nature sensitive; objectivity and credibility are essential. The purpose of ICAA’s Conflict of Interest Policy is to prevent both real and apparent conflicts of interest by ICAA representatives and ICAA School Leaders.

ICAA Chairpersons/Lead Evaluators, External Review team members, and School Leaders shall conduct themselves at all times during ICAA school visits as thoughtful, competent, well-prepared, and impartial professionals.

To assure schools and the public that ICAA reviews are impartial and objective, to avoid conflicts of interest, to promote equity and high ethical standards in the accreditation process, and to promote behaviors essential to the proper performance of ICAA duties and to the maintenance of confidence in our work by our schools, ICAA representatives and School Leaders shall follow the *Code of Ethics and Code of Conduct*. They should exclude themselves from ICAA activities for any other reasons not listed in the Code that may represent an actual or perceived conflict of interest.

*~ CODE OF ETHICS ~*

ICAA Board of Directors, ICAA Chairs, External Review team members, Commission for Accreditation, Review Committees, ORUEF/ICAA staff, and ICAA School Leaders shall agree to adhere to the ICAA Code of Ethics

Values-Based: Our actions are fundamentally informed by Biblical principles and best practices for Christian educators with an emphasis on: Christian character, integrity, service, leadership, innovation, collaboration, data-based decision making, and a focus on results.

Conflicts of Interest: We conduct ourselves in a manner which seeks to avoid a conflict of interest or any appearance of a conflict of interest. This includes the recruitment for hire of individuals from schools not our own.

Impartiality: We treat all schools/districts that are or may seek to become accredited with impartiality and courtesy.

Confidentiality and Privacy: We treat all information obtained through schools’ participation in the accreditation process as confidential, and shall not disclose such information except in a manner that is pursuant with ICAA policies, governmental regulation, or judicial procedure. We respect the privacy rights of all individuals in the performance of ICAA duties.

Transparency: We are committed to providing timely, complete, and accurate information to our schools and all stakeholders. All information about the organization will fully and honestly reflect the policies and practices of ICAA.

Legal Compliance: We are knowledgeable of and comply with all applicable laws, regulations, and requirements.

Responsible Stewardship: We manage ICAA and its resources responsibly and prudently, using ICAA resources only for ICAA purposes. Resources are defined as ICAA office supplies, ICAA office equipment, and ICAA-developed documents and products.

Inclusiveness and Diversity: We promote and seek diversity consistent with Biblical principles/imperatives and with related ORUEF/ICAA policies that are founded upon our core Scriptural beliefs in staff, board, volunteers, and in the schools and other clients we serve in order to enrich our effectiveness.

*~ CODE OF CONDUCT ~*

ICAA Board of Directors, ICAA Chairs, External Review team members, Commission for Accreditation, Review Committees, ORUEF/ICAA staff, and ICAA School Leaders shall agree to adhere to the ICAA Code of Conduct.

BIAS

1. Individuals shall not advance either personal agendas or non-ICAA-approved agendas in the conduct of accreditation reviews by attempting to apply personal or partisan interpretations of standards.
2. Individuals shall examine the facts as they exist and not be influenced by past reputation, media accounts, etc., about schools being reviewed.
3. Individuals shall exclude themselves from participating in ICAA activities if, to their knowledge, there is some predisposing factor that could prejudice them with respect to the accreditation of schools, partnerships, or approval of a professional organization’s guidelines.
4. Individuals assigned to a particular school must fully disclose to the ICAA office any activity that may be reasonably construed as a conflict of interest. If at any time during the administration of accreditation procedures a conflict of interest arises, the conflict must be immediately reported to the ICAA office.
5. Failure to disclose conflict of interest or participation in an accreditation procedure that presents a conflict of interests can result in the offending person’s removal from further participation in accreditation procedures.

COMPENSATION/GIFTS

1. ICAA Board of Directors, External Review team members, Commission for Accreditation, Review Committee shall not request or accept any compensation whatsoever or any gifts of substance from the school being reviewed or anyone affiliated with the school. If the giving of small tokens is important to a school’s culture, members may accept these tokens from the school. (Tokens might include, for example, coffee mugs, key chains, tee shirts, etc.)
2. If unsure, the member should err on the side of declining gifts of any kind.
3. External Review team members shall not expect elaborate hospitality during pre-visits or visits. The Lead Evaluator shall make arrangements in advance with the school for team meals. Schools are not expected to arrange for elaborate meals at exclusive restaurants. It is appropriate for schools to provide snacks and beverages for teams as they conduct their work at the school and at their hotel.
4. External Review team members shall use restraint in any expenditures charged to the school being visited, and shall abide by the guidelines set forth in ICAA’s Travel Reimbursement Policy.
5. Under no circumstance shall staff accept any personal compensation whatsoever or any gifts of substance from an ICAA school, though schools may pay for staff travel when they invite staff to their schools, consistent with the guidelines set forth in ICAA's Travel Reimbursement Policy.

CONFLICT OF INTEREST

1. ICAA Board of Directors, External Review team members, Commission for Accreditation, Review Committee, ORUEF/ICAA staff, and ICAA School Leaders shall not participate in any decision-making capacity if they have a close, active association with a school that is being considered for official action.

A “decision-making capacity” includes serving on a EXTERNAL REVIEW team, or Commission for Accreditation, or Review Committee of a school being considered for accreditation.

A “close active association” includes:

* having been a member of the faculty or staff or a student at the school within the past five years ("student" includes persons having been enrolled in a significant course of study or degree program, or being a graduate of the school);
* having an immediate family member attending or employed by the school;
* having applied for a position at the school within the last five years;
* having been a consultant (providing ongoing professional or expert advice), either remunerated or pro bono, the school within five years;
* having served as a commencement speaker, or otherwise profited or appeared to benefit from service to the school within five years.
1. School leaders shall not extend offers of employment to or otherwise seek to employ one or more External Review (ER) team members who served on an External Review visit to the school and are still employed by the school at which they worked when they served on the ER team.
2. External Team members shall not seek nor accept employment by the school receiving the ER visit while they on the ER visit and still employed by the school at which they worked while serving on the ER team.
3. External Review team members are not eligible to participate on a team with family members (i.e. spouses, children, siblings, etc.).
4. Commissioners shall leave meetings when the school that employs them or for which they have served as an External Review team member during the current accreditation cycle is being discussed and when a vote is taken.
5. The ICAA Executive Director and staff shall not serve as External Review team members.
6. The majority of the External Review team members shall not reside within 100 miles of the school being reviewed.

CONSULTING

When considering or accepting a personal consulting or similar arrangement with a school, ICAA Board of Directors, External Review team members and Commission for Accreditation members shall:

1. be clear that they are not serving as ICAA's agent, but are providing their own professional expertise for consulting purposes,
2. inform the school that their advice and recommendations do not guarantee accreditation outcomes,
3. not solicit consultation arrangements with schools preparing for accreditation visits,
4. not advertise their status as board members, External Review team members, or Commission for Accreditation members for the purpose of building a consulting clientele,
5. not accept a consulting arrangement at a school for which the member served on the External Review team for at least two years following the accreditation decision, and
6. refrain from voicing an opinion about the school to other Commissioners.

Under no circumstance shall staff accept fees from a school, though schools may pay for staff travel when they invite staff to their schools. If the school wishes to compensate for a visit by a staff member, payment should be made to ICAA.

The ICAA Executive Director and staff shall not serve in the capacity of an official consultant to ICAA accredited schools.

*CONFIDENTIALITY*

Confidentiality is an integral part of the accreditation process. The ICAA Board of Directors, External Review team members, Commission for Accreditation, Review Committee, and staff must have access to much sensitive information in order to conduct reviews of schools. ICAA Board of Directors, External Review team members, Commission for Accreditation, Review Committee must protect the confidentiality of this information. *Confidentiality has no expiration date – it lasts forever.*

1. ICAA Board of Directors, External Review team members, Commission for Accreditation, Review Committees, and staff shall treat as confidential all elements of the ICAA accreditation process and information gathered as part of the process - documents, interviews, discussions, interpretations, and analyses - related to the review of schools.
2. ICAA Board of Directors, External Review team members, Commission for Accreditation, Review Committees, and staff shall not discuss in public places the particulars of an on-site accreditation visit or the specifics of any case.
3. External Review team members shall not discuss details about a school related to an accreditation visit with anyone other than team members before, during, or after the visit. Policy board members shall refrain from discussing the specifics of individual cases and decisions regarding programs with individuals who are not ICAA Board of Directors, External Review team members, and Commission for Accreditation, Review Committee, or ORUEF/ICAA staff.
4. Intellectual property rights of schools and school personnel shall be respected at all times. Forms, written policies and procedures, handbooks/manuals, or other documents shall not be requested for personal/professional use until after the site visit nor used by ICAA Lead Evaluator and other External Review team members from other schools without proper permissions and/or attribution.

 *ICAA CODE OF ETHICS AND CODE OF CONDUCT AGREEMENT*

I hereby certify that I have read, understand, and will act in accordance with the ICAA Code of Ethics. I further state that I have read and understand the ICAA Conflict of Interest Policy, and to the best of my knowledge and belief, I do not have any interest nor will I take any action which would constitute a conflict of interest under such policy.

Violation of any part of the Code will result in the board member’s removal from the board. Reviewers, Commissioners, and staff members will also be subject to disciplinary action, including dismissal.

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School/Organization City, St