



*Southern Association of Colleges and Schools
Commission on Colleges
1866 Southern Lane
Decatur, Georgia 30033-4097*

ETHICAL OBLIGATIONS OF SACSCOC STAFF

Policy Statement

Southern Association of Colleges and Schools Commission on Colleges (SACSCOC) staff members hold themselves to the highest standard of personal and professional conduct. In keeping with – and support of – SACSCOC’s commitment to integrity, staff members give particular attention to maintaining confidentiality, avoiding real and apparent conflicts of interest, and striving for consistency in their respective work with member institutions and the public. SACSCOC staff members should identify those member and applying institutions for which a potential conflict of interest exists. A conflict of interest exists if a SACSCOC staff member:

1. attended the institution.
2. was employed by the institution.
3. has been a compensated consultant at the institution within the last ten years.
4. has been an appointee of the institution within the last ten years (e.g., board member).
5. has been interviewed as a candidate for employment at the institution within the last ten years.
6. served on a review committee to the institution within the last ten years.
7. has an immediate family member who is attending or has attended the institution.
8. has an immediate family member who is or has been employed at the institution.
9. has a close relationship with persons at the institution or a strong bias regarding the institution.
10. is a stockholder of a publicly traded for-profit institution.

Furthermore, SACSCOC staff members should be sensitive to personal situations which might present conflicts of interest in their relations with member and applying institutions. In particular, staff members are prohibited from accepting honoraria, awards, or honorary degrees from member or applying institutions. No consultant fee may be accepted by SACSCOC staff from any applicant, candidate, or member institution.

Obligations Regarding Publicly-Traded Institutions

Institutions accredited by SACSCOC may be publicly traded corporations or may be owned by publicly traded corporations. The actions that SACSCOC may take concerning these institutions may affect the stock price of these corporations. This fact necessarily imposes certain obligations on SACSCOC staff. A copy of this policy will be provided to all SACSCOC staff upon their employment.

Definitions

Publicly Traded Institution. A Publicly Traded Institution is a corporation that is or that owns an educational institution which is a member of or candidate for accreditation by SACSCOC, the stock of which is traded on any public stock exchange.

Immediate Family. An individual's immediate family includes spouse, children, and parents.

Direct or Beneficial Ownership. Direct or beneficial ownership includes ownership in one's name individually, through a closely held corporation or family partnership, by an individual retirement account or similar retirement vehicle, or by a trust. An individual is not considered a direct or beneficial owner of stock if that individual owns mutual funds that may own stock in a publicly traded institution. An individual is not considered a direct or beneficial owner of stock if that individual's employer holds stock of a publicly traded institution in its endowment.

Persons Subject to this Policy. Persons subject to this policy are SACSCOC Employees and their Attorneys.

Obligations

Obligations concerning publicly traded institutions the stock of which is owned by individuals. No person who is subject to this policy may take any action or serve in any capacity concerning a publicly traded institution the stock of which the individual or the individual's immediate family owns directly or beneficially.

Obligations concerning publicly traded institutions subject to action by SACSCOC. No person who is subject to this policy may disclose to any person who is not subject to this policy any information concerning any action or proposed action by SACSCOC concerning a publicly traded institution except through a means that makes the disclosure available to the general public at the same time; provided however, that SACSCOC may disclose such action or proposed action to representatives of the publicly traded institution in advance of the public disclosure.

Obligations of SACSCOC staff. SACSCOC staff shall make available to persons subject to this policy at least annually a list of all publicly traded institutions.

Procedures

SACSCOC staff members will affirm in writing their adherence to this policy upon their employment, and the signed "Conflict of Interest Statement for SACSCOC Staff Members" will be housed in the personnel files maintained by the Office of Human Resources. If this policy is revised, staff members will be required to update their files by signing and affirming their adherence to the revised policy. Any full- or part-time employee of SACSCOC is considered a staff member. SACSCOC staff members who work directly with member institutions will also maintain a record of their conflicts of interest in the SACSCOC database.

Document History

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Renamed and edited; SACSCOC Board of Trustees; December 2021

Revised: SACSCOC Board of Trustees, March 2023

Conflict of Interest Statement for SACSCOC Staff Members

I have received a copy of the policy *Ethical Obligations of SACSCOC Staff*, and by my signature affirm my commitment to maintaining confidentiality, avoiding real and apparent conflicts of interest, adhering to obligations regarding publicly traded institutions, and striving for consistency in my work with member institutions and the public. I have identified institutions in the SACSCOC database for which I have conflicts of interest, and I will endeavor to keep that list current throughout my employment with SACSCOC.

Staff Member Name

_____/_____/_____
Month Day Year