Conflicts of Interest and the Accreditation Process

The Council on Education for Public Health affirms its commitment to an accreditation process that is characterized by fairness and impartiality. Central to assuring that the procedural aspects of the Council’s operations are fair to all participants and that its decision-making processes are impartial in all instances is an organizational and personal duty to avoid real or perceived conflicts of interest. The potential for a conflict of interest arises when one's duty to make decisions in the public's interest is compromised by competing interests of a professional, personal or private nature, including but not limited to pecuniary interests.

The duty to avoid conflicts of interest applies to all participants in the accreditation process, including members of the governing body, individuals who are selected as on-site evaluators, individuals who are selected to constitute an appeals panel, staff members, consultants, advisory groups, committee members and any other individual who acts on behalf of the Council on Education for Public Health. The obligation of the individual with a conflict of interest that in any way might bias the deliberations and decisions before the Council, include:

- disclosure of the relationship(s) which constitute(s) or may be perceived as constituting a conflict,
- refusal to accept assignment, and
- abstention from all aspects of decision-making, including voting.

The Council does not seek to exclude from participation all individuals who have or who have ever had any relationship of any nature with an institution subject to accreditation, only those that would potentially bias an accreditation decision in one way or another. To this end, two important safeguards are observed by the Council: a) an institution has the right to challenge any participant in the accreditation process based on a conflict of interest and b) the governing body of the Council is the arbiter in determining whether a conflict of interest does or does not exist.

Numerous relationships might constitute a conflict of interest and the extent to which they do or do not constitute a conflict must be determined on an individual basis. Typical conflicts of interest, provided here as examples only, would include current or former affiliation with an institution being reviewed, affiliation with a competing institution in geographic proximity, a recent or current pecuniary or financial interest in the institution or its activities, a close relative with an affiliation with an institution, alumni status at an institution or other business or professional relationships.

The Council does not seek to exclude individuals, regardless of relationships or personal or professional perspectives, from other areas of decision making, such as policy development and standard setting. However, there are broader issues of conflict of interest which apply to consideration of policy and procedure. Council members may experience a conflict of interest when they serve on another board or committee in a related organization. CEPH and its constituencies assume that Council members will perform their duties in good faith, recognizing their fiduciary duty to CEPH and with the care that an ordinarily prudent person in similar circumstances would exercise. Therefore, Council members serving on other boards or committees in related organizations with interests relating to accreditation must be attentive to instances of possible conflict of interest due to dual service. If any such conflicts exist, the Council members should disclose them and are expected to conduct themselves in such a way that would not adversely impact CEPH.