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CODE OF CONDUCT AND PROFESSIONAL ETHICS GUIDE

Accreditation Commission for Acupuncture and Oriental Medicine
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Background.

The Accreditation Commission for Acupuncture and Oriental Medicine (ACAOM or Commission) is a private, not-for-profit organization founded in 1982 by the Council of Colleges of Acupuncture and Oriental Medicine and the American Association of Oriental Medicine. Recognized by the U.S. Department of Education as a "specialized and professional" accrediting agency, ACAOM's primary purposes are to establish comprehensive educational and institutional requirements for acupuncture and Oriental medicine programs, and to accredit programs and institutions that meet these requirements.

The Commission is composed of eleven commissioners who approve ACAOM's accreditation standards, policies and procedures, and oversee the accreditation process. Two Commissioners are administrator members, two are academic members, two are educator members, two are practitioner members, two are public members, and one member is at-large. Commissioners are elected by the Commission and not by any outside organizations. All Commissioners serve as volunteers. Regular meetings of the Commission are held twice a year-in the Spring and Fall. The work of the Commission is facilitated by an administrative staff that includes an Executive Director; a Director of Accreditation Services; a Director of Regulatory Affairs, a Director of Information Technology/Operations, and an Executive Assistant.

Our Mission

The mission of the Commission is to foster excellence in acupuncture and Oriental medicine through the implementation of accreditation standards and criteria for educational institutions of acupuncture and Oriental medicine.

Our Vision

The Commission promotes institutional and programmatic integrity, self-improvement and innovation through continuous self-study and assessment applying clearly defined and appropriate standards and criteria.

Our Values

The Commission's work is guided and informed by our beliefs in and commitments to:

- Honesty
- Excellence
- Accountability
- Respect
- Teamwork

Purposes

The Commission operates as a U.S. Department of Education recognized accrediting commission for acupuncture and Oriental medicine schools providing a program of instruction for the training of entry level practitioners and/or degree-bearing programs. The Commission advances the cause of education in acupuncture and Oriental medicine schools throughout the United States by:

- Developing, encouraging, maintaining and improving sound educational standards and criteria;
- Promoting interests common to acupuncture and Oriental medicine schools, including research and teaching in the science, art, use and application of traditional oriental medicine; and
- Supporting the improvement of education and practice of acupuncture and Oriental medicine within the United States.

Commission Commitment*

The Commission is committed to:

- Applying with good faith effort its policies, procedures, standards and criteria as fairly and consistently as possible.
- Providing institutions and other stakeholders opportunities to comment on the effectiveness of the accreditation review process, *Eligibility Requirements, Standards and Criteria for Accreditation*, and policies, and to conduct ongoing and regular reviews to make necessary changes.
- Providing institutions, programs, students and the general public with access to non-confidential information regarding commission actions and opportunities to make informed comment in the development of commission policies.
- Encouraging continuing communication between the Commission and institutions/programs through the accreditation liaison officer position at each institution/program.
- Maintaining and implementing a *Conflict of Interest Policy* for members of the Commission, Commission staff and Commission Representatives (i.e., site visitors) to ensure fairness and avoid bias.
- Valuing the wide diversity of institutions/programs within its scope of recognition and considering an institution's/program's purpose and character when applying the Commission's *Standards and Criteria for Accreditation*.
- Student success and learning.
- Assisting and stimulating improvement in institutional/program educational effectiveness.
- Promoting institutional/programmatic integrity, sustainability and accountability.
- Providing institutions/programs a reasonable period of time to comply with Commission requests for information and documents consistent with Commission policies.
- Striving to protect the confidentiality of an institution's/program's proprietary information.
- With respect to the accreditation review process:
 - Emphasizing the value and importance of institutional/programmatic self-evaluation and the development of appropriate evidence to support the accreditation review process.
 - Conducting evaluations using qualified peers under conditions that promote impartial and objective judgment and that avoid conflicts of interest.
 - Providing institutions/programs an opportunity to object, for cause, to the assignment of a person to the institution's/program's evaluation team.
 - Arranging for interviews with administration, faculty, students, and governing board members during the accreditation review process.
- With respect to Commission decisions on an institution's/program's accreditation, providing opportunity for the institution/program to:
 - Respond in writing to site visit reports in order to correct errors of fact and propose redaction of proprietary information.
 - Respond in writing to site visit reports on issues of substance.
 - Appear before the Commission when reports are considered as conditions warrant.
 - Receive written notice from Commission staff generally within thirty (30) days after Commission decisions are made.
 - Seek reconsideration of and appeal Commission actions according to published procedures.

*Note: this Commission Commitment statement was adapted from the Western Association of Schools and Colleges, Senior College and University Commission's commitment statement.

Confidentiality

The Commission regards all non-public documents, records, information and data including eligibility reports, self-study reports, interim reports, annual reports, financial audits and financial projections, information regarding disputes, personal information or data about employees or prospective or current students, marketing plans, current or future

business plans and models submitted by an institution or program to the Commission for accreditation purposes as "Confidential Information." As a representative of the Commission you may not share Confidential Information you receive while performing assigned duties as staff, commissioners, consultants, site visitors or representative of the Commission with any person, agencies, entities or other persons except as required or permitted by federal or state laws and regulations), and as necessary for the Commission to conduct its official accreditation activities. The Commission recognizes that non-supervisory employees have certain rights under the labor laws to discuss among themselves, and with third parties, the terms and conditions of employment. This provision of the Code does not prohibit or otherwise interfere with non-supervisory employees' rights to engage in these employee protected communications.

You should use, as a minimum, the same degree of care to avoid disclosure or use of Confidential Information as you use with respect to your own confidential, proprietary and secret information but in any case using no less than a reasonable degree of care. You should limit access to all Confidential Information to only those Commission staff, agents and Commission Representatives who need to know such information for carrying out the Commission's work except as required or permitted by federal or state laws and regulations. If you leave the Commission employment, or your activities on behalf of the Commission have ended, you are prohibited from copying or retaining any documents or other materials containing confidential information. The obligation to maintain confidentiality of this information continues even after your relationship with the Commission has ended.

It is possible that while performing your assigned duties on behalf of the Commission you will be contacted by various stakeholders and communities of interest including Acupuncture and Oriental Medicine (AOM) school or program representatives, AOM practitioners, representatives of AOM organizations and various regulatory agencies with questions, requests, or comments concerning ACAOM business, or attempting to lobby you to take certain actions or policy positions. Please note that the US Department of Education *Recognition Criteria* requires that the Commission and those acting on its behalf remain separate and independent of "...any related, associated, or affiliated trade association or membership organization" (34 CFR 602.14). Accordingly, when responding to such contacts, you must treat all of the Commission's accreditation-related activities, deliberations and work products, except those that are conducted in conjunction with ACAOM public hearing protocols, as confidential information. To preserve the confidentiality of Commission deliberations and to avoid even the appearance of undue influence or conflicts of interest, you should make no direct or indirect private or public comment, statement, or communication with respect to, or otherwise disclose or permit the disclosure of any Confidential Information or of any matter regarding ACAOM operations, policies, procedures, standards, program review decisions, or other matters related to ACAOM's activities without the prior written consent of the Commission. Should you be contacted by a third-party regarding Commission business it is important that you timely refer the inquiring party to the Commission's Executive Director.

For additional information, consult the Commission's *Confidentiality and Non-Disclosure Agreement*.

Actual and Potential Conflicts of Interest

The Commission is committed to maintaining a high standard of professional integrity in fostering scientific, clinical, and educational work in the fields of acupuncture and oriental medicine. It is essential that the Commission's staff, Commissioners, consultants, communities of interest and the general public (stakeholders) recognize and have confidence in this commitment.

As a representative of the Commission you share a duty to conduct our accreditation activities and ourselves with the utmost integrity. However, at times it can be difficult when our personal interests interfere – or seem to interfere – with the interests of the Commission or an accredited or candidate institution. As representatives of the Commission, we are expected to act in the best interests of ACAOM, to disclose and resolve any actual or potential conflicts of interest in advance, and to avoid even the appearance of any such conflict. A "conflict of interest" occurs when the private interest of an employee either interferes or appears to interfere with the interests of the Commission. It is imperative that we, as Representatives, be proactive in the recognition of those relationships or interactions that may be perceived to call our professionalism into question.

A conflict of interest may arise when you, a spouse/partner or family member, or a friend:

- Engage in activities that compete with, or appear to compete with, the interests of the Commission;
- Let Commission decisions be influenced, or appear to be influenced, by personal or family interests or friendships;
- Use Commission property, information, or resources for personal benefit or the benefit of others;
- Hire, supervise, or have a direct or indirect line of reporting to a family member or someone with whom you have a romantic relationship;
- Maintain outside employment or relationships that negatively affect your job performance or ability to fulfill your ACAOM responsibilities;
- Receive a personal or financial benefit from, have a financial interest in, provide services to, or work for a student, school, clinic, employer, supplier, contractor, or company that seeks to do business with the Commission.

The above guidelines should help you recognize and avoid potential conflicts of interest. Please remember that conflicts of interest are not restricted to these guidelines. Conflicts of interest are common, and having one is not always a violation of this Code. However, failing to disclose an actual or potential conflict of interest is a violation. You have a duty to immediately disclose any potential conflicts of interest to ACAOM's Executive Director. If the Executive Director believes that he or she may have a potential conflict of interest, he or she must report the concern immediately to the Chairperson of the Commission.

For additional information, consult the Commission's *Conflict of Interest and Disclosure Policy*.

Professional Relationships

All Commission employees and Commission Representatives are expected to conduct themselves in a manner which promotes a professional agency and employment environment. Due to the inherently unequal relationship that exists between certain individuals, including supervisors and their subordinates, and Commission employees and representatives of stakeholder programs and institutions, dating or intimate social relationships can be problematic. Such relationships can easily degenerate into allegations of sexual harassment and expose the Commission to potential legal problems. In addition, the real or perceived problem of favoritism can have negative and far-reaching consequences and can seriously affect the management process as well as undermine the reputation of the Commission and its commitment to professional integrity.

In order to avoid these potential problems, romantic, intimate, or sexual relationships between Commission employees, or between Commission employees and representatives of stakeholder programs or institutions are prohibited. Prohibited fraternization includes, but is not limited to, inappropriate socializing whether in or out-of-office, or in connection with any non-sanctioned in-office Commission activity. These prohibited interactions may take place over the telephone, online, or over social media.

Consensual Relationships

If you have a pre-existing relationship or if you become related, married, or involved in a romantic, intimate or sexual relationship with another Commission employee or Commission Representative, or an employee or representative of a stakeholder program or institution subject to Commission oversight, you must immediately notify ACAOM's Executive Director and disclose the relationship. The Executive Director will determine if there is a way to address or mitigate any perceived, potential, or actual conflict of interest that might prove detrimental to the Commission, its stakeholder programs and institutions, or either party. Violation of this provision is considered a serious violation of Commission principles and may result in discipline, up to and including termination of employment or continued involvement as a Commission Representative.

Appropriate Business Gifts and Entertainment

The acceptance of certain modest business gifts and entertainment (e.g., refreshments provided by a host institution during a site visit; seasonal and/or thank you cards or similar tokens of gratitude) may be appropriate if not intended to influence the recipient's intentions. However, because no clear guidelines exist to define the point at which common social courtesies may be regarded as improper or unethical inducements, extreme caution must be taken in this regard. Modest business entertainment may only be accepted in certain limited scenarios and must not create an expectation or inference of an obligation by the beneficiary to the giver. ACAOM employees and Commission Representatives (e.g., Commissioners, staff, site visitors) should consult with the Commission's Executive Director if they are unsure whether a particular gift or activity is appropriate.

The following direct and indirect forms of compensation or inducements are strictly prohibited:

- Gifts of more than nominal values from current or prospective ACAOM-accredited institutions or programs, suppliers or vendors;
- Personal loans or services (e.g., medical treatments, medicinal herbs)
- Excessive entertainment and/or travel;
- Separate individual payment for ACAOM-related activities by an entity other than the Commission.

Should any of these gifts or inducements be offered by a third party, it must be respectfully declined, unless you receive prior written approval from ACAOM's Executive Director. If receipt of a gift is unavoidable, you must timely report the gift to ACAOM's Executive Director for a determination of whether you may retain the gift or whether it must be disposed of properly.

Relationships with Suppliers and Vendors

The Commission is dedicated to purchasing goods and services in an ethical manner while continuing to maintain the best overall value for ACAOM. We must treat existing and potential suppliers and vendors courteously, fairly, and honestly and comply with any confidentiality agreements entered into with our suppliers and vendors.

We expect that our suppliers and vendors will conduct business activities on behalf of the Commission in accordance with business standards and values that align with our own. Therefore, we require suppliers and vendors to comply with applicable local, state, and federal laws and regulations, as well as the laws and regulations of the country in which the supplier or vendor conducts its business or performs services.

Dealing Fairly and Ethically with Others

The Commission endeavors, under all circumstances, to be guided by principles of collegiality, fairness, honesty and integrity when conducting Commission business and ourselves.

Non-Discrimination

We are committed to diversity, and an environment where Commission employees, our Representatives and those we serve are treated fairly, have an equal chance to succeed, and are appreciated and treated with dignity and respect regardless of race, gender, color, religion, sexual orientation, gender identification, age, national origin, disability, medical condition, genetic information, marital status, veteran status, or any other basis protected by law.

Protection and Use of Time, Equipment and Resources

Employees and Representatives of the Commission may be provided with certain resources and supplies to assist in the efficient and effective performance of various work duties. Depending on the activity, these items may include a computer, mobile device or software. When provided, internet access is intended for business use and may not be used for any inappropriate, unethical, or illegal activity.

All Commission employees and Representatives should note that the Commission's email and internet message systems are the property of the Commission and that any emails or text messages generated are not the property of individual users. There should be no expectation of privacy in email or on any Commission owned computer system or computer network. The Commission may, without prior notice and for any reason, monitor, access, review, copy, delete, disclose, and distribute to any party any message sent, received, stored on the email system or on any computer or network that makes up the Commission computer and network infrastructure.

Incidental personal use of Commission resources is allowed; however, misuse or wasting of either Commission assets or work time is not permitted. We must use common sense when using Commission assets for personal reasons, and should ensure that occasional use does not negatively affect productivity or violate policy.

Theft and loss have a direct impact on Commission activities. We must take steps to ensure that any equipment or assets provided to us by the Commission are protected and handled properly. Any mobile phone, computer, or other device used in whole or in part for Commission business purposes must have appropriate security protection and should be locked and stored in a safe place when not in use (e.g., in locked file drawers, hotel safes, automobile trunks).

Intellectual property

The Commission has ownership interests in intellectual property assets, including materials, inventions, or ideas that may be copyrighted, trademarked, or patented using the Commission's brand identity, name and logo. We all have an obligation to preserve the intellectual property ownership interests of the Commission. Further, as part of the Commission's commitment to fair dealing, all employees are prohibited from using or disclosing the intellectual property or trade secrets of third parties (e.g., eligible, pre-accredited and accredited institutions/programs) for one's personal benefit. Questions or concerns regarding the use of intellectual property or fair use under the federal Copyright Act should be referred to the Commission's Executive Director.

Maintaining Accurate Records

The Commission is committed to keeping accurate and thorough accreditation and business records that correctly reflect events, decisions and transactions.

For additional information, consult ACAOM's *Document Management Policy*, 34 CFR §602.15(b) and 20 U.S.C. 1099(b)

Disclosures to Regulatory Bodies

As employees or Representatives of the Commission, we are committed to ensuring that we disclose full, fair, accurate, timely, and understandable reports when communicating with the Commission, the U.S. Department of Education, any other regulatory body or government agency, and the public. To guarantee the accuracy and completeness of every disclosure, only authorized agents or employees of the Commission may distribute these reports or speak on behalf of the Commission. It is a violation of this Code to make or cause to be made a false statement to a governmental official or auditor, or to conceal or cause to be concealed a material fact called for in a government report or other filing.

Contact with the U.S. Department of Education

If you become aware of a non-routine event or communication from the U.S. Department of Education which could impact the status of the Commission or otherwise present a legal or compliance issue with the U.S. Department of Education, you must immediately notify the Commission's Executive Director.

Executive Director
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Media Inquiries

Occasionally, you may receive an inquiry from the media requesting information or comment on the Commission. In order to ensure that all communications offered to the media are honest, ethical, accurate, objective, timely and conform to sound business practices, only designated spokespersons are authorized to communicate publicly on behalf of the Commission. Therefore, all inquiries should be referred to the Commission's Executive Director at 1.952.212.2434. or by emailing info@acaom.org.

Social Media

As employees and Representatives of the Commission, we embrace opportunities available to us through social media. However, we must avoid being perceived as an agent or representative of the Commission in our personal use of social media. This means that if your personal use includes references to the Commission, it is best to make clear that your opinion does not represent those of the Commission.

Health, Safety and Security in Our Workplaces

The Commission is committed to providing safe, secure, and healthy work environments for our staff and Commission Representatives. It is important for each of us to uphold this commitment by acting in a safety-conscious manner at all times. We must comply with all applicable workplace health and safety laws. If we observe an actual or potential accident, injury, or unsafe act, we must immediately report this condition to ACAOM's Executive Director.

As colleagues, we are responsible for maintaining a positive and safe work environment – including one that is free of violence. Therefore, we are committed to a workplace free of violence and unauthorized weapons, and we do not tolerate violent conduct. We must never take – or tolerate – any action that is unprofessional, threatening, intimidating, bullying, or harassing, either in person or via electronic mediums such as the internet. Any behavior that is threatening or harassing should be reported immediately to ACAOM's Executive Director. If you or your colleagues face immediate danger, contact the local authorities.

Substance Abuse

Commission employees and Commission Representatives who work under the influence of illegal drugs or alcohol pose an unacceptable safety risk to themselves and others. The use of illegal drugs, controlled substances, or the misuse of prescription medication and/or herbs while at work on behalf of the Commission affects job performance and could harm the reputation of the Commission and its stakeholders. Therefore, any such use is a violation of this Code.

Seeking Guidance and Reporting Concerns

As employees and Representatives of the Commission, we are obligated to ask questions and raise concerns when compliance issues arise. We cannot keep silent about an issue or activity that we believe is a violation of the Commission's values, principles, and ethics, nor should we assume Commission leadership already knows about or is not concerned with a potential problem. Instead, we must speak up and do the right thing.

Good Faith Reporting

The Commission is committed to creating a safe and compliant environment in which its employees, Representatives and stakeholders feel comfortable raising "good faith" concerns regarding compliance issues. Good faith reporting does not mean that the person reporting must be "right" when he or she raises a concern or that any of the suspected violations need to have actually taken place; the employee or representative must honestly believe that the information he or she is providing regarding an alleged violation is accurate. Any Commission employee or representative who knowingly submits a false report of a violation, is not truthful during an investigation, or who interferes or fails to cooperate with a Code investigation will be subject to disciplinary action.

Investigation of Reported Concerns

The Commission takes all reported concerns seriously. We maintain confidentiality in all investigations to the extent possible under the circumstances and in accordance with the Commission's legal obligations. You may remain anonymous when reporting concerns. We will investigate all matters brought to our attention; make a determination of whether this Code, any policy, law, regulation or accreditation eligibility standard or criteria has been violated; and take appropriate corrective action.

Non-Retaliation

All Commission employees, Representatives and stakeholders are expected to cooperate with any investigations. The Commission will not tolerate any retaliatory actions taken against individuals for their participation in investigations.

We appreciate Commission employees, Representatives and stakeholders who identify potential problems that could adversely affect the work or reputation of the Commission, or the safety of its staff and Representatives. No adverse employment action may be taken against an employee or representative for reporting or participating in any investigation. If you discover that you work with someone who has raised a concern or participated in an investigation, you must continue to treat that person with courtesy and respect. Any retaliation against a Commission employee or representative who makes a good faith report or in good faith cooperates with an investigation is a violation of this Code.

Our Code is not a Contract

Our Code is not a contract. It does not create or imply any specific rights or guarantee of employment or professional assignment for any specific period of time.