



Early Childhood Higher Education Programs

Commission Handbook

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This handbook contains policies and procedures related to the NAEYC Commission on the Accreditation of Early Childhood Higher Education Programs.

All Commission work is guided by

- *The National Association for the Education of Young Children Early Childhood Higher Education Programs Accreditation Handbook (current edition)*
- *The NAEYC Professional Preparation Standards (current edition)*
- *Relevant sections of the NAEYC Governing Board Policy Manual*
- *Best practices for higher education accrediting agencies as outlined in The 1965 Higher Education Act, as amended, Association of Specialized and Professional Accreditors (ASPA) Code of Good Practice, and the Council for Higher Education Accreditation (CHEA) Recognition Policy and Procedures*

This handbook does not attempt to duplicate or replace the sources listed above. Commissioners should use this handbook as a companion to those documents, especially the Accreditation Handbook.

Overview of the Early Childhood Higher Education Accreditation System

Purpose

The purpose of NAEYC Early Childhood Higher Education Accreditation is to promote excellence in early childhood teacher education and to provide a valid and objective external evaluation of early childhood degree programs as a service to the public, to prospective students, and to the profession.

Scope

The scope of NAEYC's higher education accreditation is programs at the associate, baccalaureate and master's degree levels that prepare students to work in the early childhood field. The degree program must be offered at an institution of higher education that is located in a U.S. state, district, or territory and currently accredited by a regional accrediting agency that is recognized by the Council for Higher Education Accreditation (CHEA) or the U.S. Department of Education.

Mission

The mission of the NAEYC Early Childhood Higher Education Accreditation system is to set a standard of excellence for early childhood education degree programs and to recognize programs that have demonstrated to a peer review board that they meet this standard, thereby benefiting the programs, young children, families, and communities.

Guiding Principles

The NAEYC early childhood higher education accreditation system:

- Is rigorous yet not unduly burdensome for programs and institutions—supporting excellence rather than taking time away from excellence
- Improves diverse and nontraditional students' access to professional preparation programs
- Aligns with nationally recognized content standards
- Promotes articulation between programs at different degree levels
- Links with state efforts in setting standards for programs and licensure of early childhood professionals
- Links with national and state efforts to support and reward early childhood educators for achieving higher levels of education
- Includes or links with training and technical assistance that gives programs information needed to conduct self-study work and prepare for accreditation review

- Includes an evaluation and research component in the development and implementation of the system
- Results in benefits for programs and students regardless of the outcome of the accreditation decision
- Seeks input from ACCESS (American Associate Degree Early Childhood Educators), NAECTE (National Association of Early Childhood Teacher Education), NACCTEP (National Association of Community College Teacher Education Programs) and others as the most credible and influential organizations representing early childhood professional preparation and educator preparation
- Functions and is governed in a way that preserves the independence of the accreditation process and protects its founding organization from even the appearance of conflict of interest.
- Abides by best practices in higher education accreditation as outlined by organizations such as the Council for Higher Education Accreditation (CHEA) and the Association of Specialized Professional Accreditation (ASPA) (see Appendix A for ASPA Code of Good Practice).

Commitment to High Performing Inclusive Organization

The Commission’s continuing commitment to being an ever more high-performing inclusive organization is guided by the understanding that this requires:

- (a) Recognizing the uniqueness of individuals, groups, and organizations and that becoming more high-performing and inclusive depends upon the simultaneous growth and development of individuals, groups and the organization.
- (b) Defining and understanding diversity as broad, multidimensional, and inclusive of diverse viewpoints and perspectives, consistent with the overarching mission and vision of the organization.
- (c) Understanding the relationship of being inclusive to being high performing, and the importance of being high performing to the organization’s ability to achieve its mission and vision. The commitment to including a diversity of experiences and backgrounds requires special attention to achieving open and constructive debate prior to making decisions.
- (d) Understanding and acknowledging the role of individual, organizational and societal contexts to growth and development. Personal life experiences influence the uniqueness of individuals; organizational cultures reflect leaders’ and members’ understanding of pluralism and inclusion; and society reflects the power and systems that confer privilege or deny access and opportunity to individuals and groups.
- (e) Seeing value in being visionary, developmental and intentional in addressing change—particularly concerning social policy, demographic, and global changes impacting the organization’s capacity to achieve its mission.
- (f) Seeking to leverage the inherent tensions between historical context, the power of the present, and intentional and inevitable change to remain dynamic, viable institutions. This requires intentional strategies for managing change and identifying and supporting desired results of organizational transformation.

- (g) Making a long-term commitment to plan, build understanding, develop policy, and take action to sustain organizational transformation.

Where to find accreditation policies and procedures

The core policies and procedures that guide programs, reviewers, Commissioners and staff are found in the current *National Association for the Education of Young Children Early Childhood Higher Education Accreditation Handbook*. This handbook includes policies and procedures for determining eligibility, conducting self-study work, submitting Self Study Reports, hosting and conducting a site visit, and filing complaints and appeals.

The accreditation standards and rubrics used when making decisions about whether or not a program substantially meets the six NAEYC student outcome standards are found in the *2010 NAEYC Standards for Initial and Advanced Early Childhood Professional Preparation Programs: For use by Associate, Baccalaureate and Graduate Degree Programs*. The six core 2010 accreditation standards have their foundation in the *2009 NAEYC Standards for Early Childhood Preparation Programs*.

Policies and procedures that are specific to the Commission's work are found in this *NAEYC Early Childhood Higher Education Programs Accreditation Commission Handbook*.

The Accreditation Handbook and 2010 Standards are available for download in the online community Resource Library. They are also available for download on the public NAEYC website.

The online community also includes a space for Commission documents that is visible and accessible only to current Commission members and appropriate staff. Additional resources, draft documents, committee workspaces and forms may be found there.

Chapter 1: Commission Duties and Qualifications

Duties of the Commission

The Commission has three primary duties:

- Determine and oversee policies for the accreditation system. The Commission determines the policies and processes that guide the accreditation system. These policies and processes are included in the Accreditation Handbook, which must be approved by the Commission.
- Make accreditation decisions. The Commission makes accreditation decisions for programs seeking first-time and renewal accreditation.
- Determine and oversee the accreditation standards. The Commission develops and revises the accreditation standards.

The principal functions of the Commission are to exercise professional judgment in making accreditation decisions and to set standards. The Commission works with staff to develop guidance documents and data gathering instruments necessary to carry out these functions. The Commission meets to review the programs that have received a site visit during the preceding spring or fall including all associated documentation, and to review reports from programs that are Accredited with Conditions or Accredited with Probation. The Commission also considers programs' requests regarding extensions; questions related to maintenance of Accreditation Eligibility Requirements; and other matters affecting programs' accreditation status. Commission members participate in training and orientation, including parts of peer reviewer training.

Composition of the Commission

The Commission consists of *not fewer than eight members*, serving staggered three-year terms. One member is elected as Chair and another as Chair-elect. Membership includes at least one *public member*. The senior staff leader of the accreditation system serves as an ex-officio member of the Commission. Commissioners bring a demonstrated commitment to the aims of early childhood teacher education at higher education institutions; an understanding of the nature of program accreditation systems, policy and procedures; and respect for the confidential, fair, and impartial nature of accreditation decisions.

The composition of the Commission reflects NAEYC's commitment to being a high-performing, inclusive organization. The Commission values diversity (with specific attention to culture and ethnicity, language, geographic location, professional affiliation, institution type, and gender) and inclusion in accomplishing its work of higher education degree program accreditation. Commissioners represent a range of experience that supports the mission and responsibilities of the Commission and the higher education accreditation process.

Commission members should be free of any conflicts per the conflicts of interest policy.

Qualifications of Commissioners

The following criteria incorporate the knowledge, skills, and dispositions a Commission member needs to make high-stakes accreditation decisions:

Professional criteria¹

- Commitment to the aims of early childhood teacher education
- Understanding of the nature of program accreditation policy and procedure
- Respect for the confidential, fair, and impartial nature of accreditation decisions
- Prior or current professional experience related to early childhood professional preparation
- Knowledge of NAEYC Standards for Professional Preparation

Personal criteria

- Demonstrated ability to work in a close collegial relationship with others
- Ability to strive for consensus within a group and take responsibility for actions based on a vote by the majority
- Strong communication and interpersonal skills
- Ability to objectively consider various perspectives
- Understanding and commitment to the Commission’s purpose, scope, mission, and Code of Conduct
- Demonstrated commitment to the Commission’s priority to be a highly functioning organization that is continually enriched by its institutional commitment to diversity and inclusion
- Willingness and ability to serve a three-year term, including approximately two meetings in Washington, D.C. each year and at least one virtual meeting
- Ability to bring a neutral perspective to the Commission’s work
- Commitment of time, knowledge and skills to provide vision and leadership as an effectively contributing Commission member.
- Capacity to read large volumes of accreditation reports in a condensed period of time.

Definition of a Public Member

The public member is appointed to the Commission. Public members “may include students, parents, persons from business and the professions who provide an independent and external perspective of the accreditation process” (CHEA Handbook). The public member is expected to participate as a full voting Commissioner. Individual responsibilities will be assigned commensurate with experience. For example, the public member is expected to review accreditation cases, but the role in the review process, particularly as a lead, may vary.

¹ Professional criteria for the public member of the Commission will differ.

The public member is an individual who:

- is outside the scope of early childhood education. The public member cannot be employed in an early childhood practice setting or be a faculty member or administrator in an early childhood higher education program.
- Has a history of involvement in community or professional organizations
- Has a minimum of 10 years of experience in his/her profession
- Has some experiences in a regulatory or quality assurance body (preferred) but does not at present serve on a regulatory body
- Agrees to represent the general public and apply the accreditation standards objectively and fairly without regard to the issues of special interest groups
- Does not have overlapping interest in the accreditation process due to dual service and whose status does not represent a conflict of interest that would interfere with that person's ability to discharge duties in good faith and with the care that an ordinarily prudent person would exercise in like position
- Is not
 - An employee, member of the governing board, owner or shareholder of, or consultant to a program that is accredited by the NAEYC Accreditation of Early Childhood Higher Education Programs system or one that has applied for accreditation
 - A member of any trade association or membership organization related to, affiliated with, or associated with the NAEYC Accreditation of Early Childhood Higher Education Programs system
 - A spouse, parent, child or sibling of an individual identified in the above bullets. Applicants may view the list of programs accredited by the NAEYC Accreditation of Early Childhood Higher Education Programs system at www.naeyc.org/highered

Officers of the Commission

The officers of the Commission are the Chair, Chair-elect and Past-Chair.

Responsibilities of the Chair

The chair of the Commission leads the work of the Commission as a whole. The Commission Chair has experience on the Commission and is committed to its work. In general, the Chair learns about and prepares for the role of Chair by serving at least one year as Chair Elect. After a two-year term as Chair, the Chair serves an additional year as Past Chair. In general, the Commission Chair is responsible for

- Serves on the Executive Committee of the Commission
- Scheduling and planning Commission meetings and agendas, in collaboration with NAEYC staff.

- Participating in regular meetings with the lead NAEYC accreditation staff and occasional calls with Committee chairs; dissemination of highlights, as appropriate, from those calls to the Commission in the online community.
- Presiding at Commission meetings to ensure that accreditation policy and procedure are followed, that everyone who wants to speak can do so, and that Commission decisions and other actions comply with the requirements of policies and procedures of the Commission.
- Ensuring that input from NAEYC staff is considered in Commission deliberations and decisions, understanding that staff hold expertise in accreditation policy and practice.
- Sharing primary responsibility for the accreditation system compliance with accreditation policies with NAEYC staff.
- Appointing members to Commission committees and panels
- Appointing members of an Appeals Panel. If the Chair has a conflict of interest with the program that is appealing a decision, the chair will appoint the past-chair or chair-elect to oversee the appeals process.
- Working with appropriate committees to ensure effective orientation, mentoring and support of new members
- Delegating responsibilities to Commission members, committees and committee chairs
- Maintaining contact with committee chairs to help them accomplish each committee's charge and ensure that they receive needed support from the Commission and staff.
- Appointing non-Commission members in support of Commission work and policies
- Maintaining relationships with NAEYC leadership (executive leadership and the Governing Board)

Responsibilities of the Chairperson-elect

Typically, candidates for the chair-elect position must have completed at least one year of Commission service but no more than three years of a maximum six-year period of service (two three-year terms).

Candidates must have consistently shown excellence in conducting all aspects of a Commissioner's responsibilities, including providing timely, accurate and well-written reviews of assigned cases, participating actively and respectfully during Commission meetings, and contributing to maintaining the integrity of the accreditation system.

- Serves at least a one-year term as Chair-elect prior to becoming the Chair
- Serves on the Executive Committee of the Commission
- Assumes the duties of the Chair if the Chair is absent during a Commission meeting, recuses him/herself from Commission deliberations due to conflict of interest, becomes incapacitated, or leaves the Commission prior to the expiration of his/her term.

Responsibilities of the Past-Chair

- Serves as an advisor to the Chair.

- Supports the onboarding of the Chair-Elect.
- Serves on the Executive Committee of the Commission

Chapter Two: Nominations and Elections

Commission terms

Term of office typically begins January 1, with the exception of interim appointments to fill an uncompleted term. Members serve for three years and are limited to two consecutive terms. With a hiatus of at least one year, a Commission member may be reappointed. In cases where a Commissioner becomes chair-elect during her second term, her term will be extended to allow for serving as Chair and past-chair. Interim appointments are appointments that begin a year or more after a term begins. Interim appointments are not counted toward the first full term.

The General Nominations Process for Elected Commissioners

The Commission Nomination and Selection Committee oversees the nominations, appointment and selection process for new Commissioners. The nominations process includes the selection of appointed members and members selected through the Call for Nominations process. The nomination and selection process includes recruitment, identifying selection criteria, application and resume review, and preparation of the slate of candidates for full Commission vote.

Phase One: The Call for Nominations

- The Committee issues a Call for Nominations requiring nominees to submit applications that include their CV and letters of interest.
- The Call for Nominations takes place in a highly publicized manner that reflects a commitment to the diversity and inclusiveness of the Commission.
- The Call for Nominations remains open for at least 4 weeks.
- Sources of recruitment can include but are not limited to the following: Higher Education Institutions, including Historically Black Colleges and Universities, Hispanic and Asian Serving Institutions, and American Indian Tribal Colleges, as well as national organizations including ACCESS, American Council on Education, American Association of Community Colleges, NAECTE, and AACTE.
- Electronic and print media could include: NAEYC publications such as *Young Children*, NAEYC website, notices/emails to all NAEYC Forum groups, and emails/mailings to all NAEYC affiliates.

Phase Two: The Selection of a Slate

The Committee conducts an annual analysis of the Commission membership to identify the selection criteria required to maintain the Commission's diversity and range of expertise. After the conclusion of the Call for Nominations, the Committee will review the applicants in relation to the results of the Committee's analysis of needs. The Committee will identify at least two candidates for each open seat to invite to submit further information and participate in an interview. Staff will support phone interviews conducted by the Nomination and Selection Committee. Upon completion of the interviews, the Committee will select one candidate for each open seat to recommend to the Commission. The candidate

will submit to the same background check as NAEYC Governing Board members. NAEYC will pay the costs for the background check. Upon conclusion of a clean background check, the Committee will recommend the candidate to the Commission. See Appendix B for the Background Check Policy

The Committee will include NAEYC staff and the Commission Chair in communications with candidates so that staff can provide documentation of process for national office records and potential external review. Primary responsibility for implementing policy and procedure lies with NAEYC staff and the Committee Chair.

Phase Three: The Committee's Recommendation to the Commission

The Nomination and Selection Committee will prepare a written report to the Commission Chair that presents names and documents how the candidates meet Commission criteria and qualifications; a summary of the composition of the Commission as a whole with a description of how the appointees contribute to that composition; and supporting information about each appointee including contact information and CVs. This report is submitted to the Commission Chair at least two weeks before the Commission meeting where the slate will be considered. The Committee Chair will present the slate to the full Commission at the meeting.

Phase Four: Notification to and Orientation of New Commissioners

Once the appointments are approved, NAEYC staff will send appointment letters, with copies to the Commission Chair and Nomination and Selection Committee Chair. The Commissioner(s)-elect will be invited to observe Commission meetings and Commission business prior to the beginning of his/her term. Staff will provide access to the Commission's online community, update Commission rosters and support orientation activities as needed.

New Commissioners will be assigned a mentor Commissioner to provide one-on-one support as new Commissioners prepare for Commission meetings. Mentoring will last for at least one year or more (if needed).

NAEYC staff, the Commission chair, and the mentor Commissioner will provide virtual orientations that include an overview of the accreditation system, the Commission role and responsibilities, and an overview of all of the tools and resources the Commission uses to conduct its business. Mentor Commissioners are responsible for providing in-depth training on reviewing accreditation cases.

An in-person orientation may be provided at the first Commission meeting the new Commissioner attends. The in-person orientation will provide an opportunity for new Commissioners to practice presenting their accreditation cases, an overview of Commission responsibilities from NAEYC's legal counsel, and a review of Commission practices and tools.

The Commission Chair and staff is responsible for development and delivery of orientation for new Commission members.

Process for Appointments

When a Commission term ends before its expected expiration date, the Chair makes an interim appointment to complete the term, with advisement of the Nomination and Selection Committee. The interim appointment is not counted as a full term and so not counted in the maximum two terms of Commission service.

In the case of filling the public seat on the Commission, the Chair of the Commission will appoint the member. The Commission will not vote to approve the appointment, as it does with the other seats on the Commission. The Nomination and Selection Committee can choose to run a Call for Nominations for the Public Seat and/or recruit an individual for the seat. The Committee will make a recommendation to the Chair of the Commission.

In addition to the public member, up to one other member of the Commission can be appointed by the chair to meet a specific need of the Commission (e.g. financial expertise, accreditation system expertise, etc.).

Eligibility of Commissioners to Serve a Second Term

The Chair, in consultation with the Chair-Elect and senior NAEYC staff, has the authority to invite commissioners to serve a second term. Approximately six months prior to the end of a Commissioner's first term, the Chair of the Commission may invite him/her to serve a second term if the Commissioner has:

- attended Commission meetings regularly
- participated fully in online and face-to-face Commission meetings
- upheld the Code of Conduct
- contributed to the effectiveness of the Commission and accreditation system

Resignations, Removal and Completion of Unexpired Terms

When a Commissioner is unable to meet the responsibilities of the seat, the appointment may be ended before the term has expired through either of the following procedures.

- Voluntary submission of resignation letter in writing to the Commission Chair with a copy to NAEYC staff (a written notice of resignation is not required for a Commissioner who may have a serious illness or be otherwise incapacitated).
- Vote of full Commission to remove a member for failure to meet Commissioner responsibilities which may include non-attendance at two meetings in one year, lack of participation in online Commission business, violations of the Code of Conduct, or other actions that compromise the effectiveness of the Commission and the accreditation system.

Chapter Three: Commission Committees

The Commission's work is organized by the Commission Chair through standing and ad hoc committees and panels. Ad hoc committees are temporary, appointed by the Commission Chair with specific and time-limited charges. Standing Committees are charged with ongoing work that needs to be conducted between meetings.

- All Standing Committees have a Committee Chair.
- All Commission members are appointed to at least one committee, beginning in their first term.
- The Commission Chair makes all committee and panel appointments.
- The charge and continuation of Standing Committees is reviewed at least annually.
- The Commission Chair may appoint non-Commission members to standing committees and ad hoc committees to support Commission work and policies.
- The Commission Chair and Committee Chairs work closely and collaboratively with NAEYC staff.
- Maintaining relationships with NAEYC leadership (executive leadership and the Governing Board)

There are four current standing committees:

- The Executive Committee
- The Nomination and Selection Committee
- The Policy and Standards Committee
- The Training and Technical Assistance Committee

Responsibilities of Committee chairs

Each committee has a chair, appointed by the Commission Chair. Committee Chairs are responsible for organizing the work of the committee, including monitoring of committee responsibilities and timelines, collaborating with other committee members, and preparing and presenting reports on the committee's work.

Staff work with the committee chairs to ensure that relevant policies and procedures are being implemented, to facilitate communication within the committee, and to clarify process.

Committee work is conducted in the private Commission online community discussion space rather than in personal email communication to ensure access for all Commissioners to the committee's work and to ensure privacy for confidential communication.

Roles and responsibilities of the Executive Committee

The Executive Committee is composed of the Commission Chair, the Chair-elect, and the Past-Chair. When the chair-elect role is not filled the Chair may appoint an additional Commissioner to the Executive Committee. The Executive Committee must include Commissioners teaching in or overseeing associate degree programs **and** Commissioners teaching in or overseeing baccalaureate and/or master's degree programs. Retired faculty on the Commission are eligible to serve on the Executive Committee. The primary responsibilities of the Executive Committee include collaboration with the ex officio staff Commission member to

- Conduct Commission business between meetings
- Provide oversight regarding the Commission's compliance with current policy as published in the *NAEYC Early Childhood Higher Education Accreditation Handbook*, and the *NAEYC Initial & Advanced Accreditation Standards for use by Associate, Baccalaureate, and Graduate Degree Programs*;
- Provide oversight regarding the Commission's compliance with Council for Higher Education Accreditation (CHEA) Recognition Criteria; with membership expectations for the Association of Specialized Professional Accreditors (ASPA); and with accepted best practices in higher education accreditation
- Consider concerns related to an accredited program's compliance with eligibility requirements. If it determines that there is relevant concern that affects the accreditation status of the program, it forwards a recommended action to the full Commission for a vote.
- Provide oversight of the Commission budget
- Consider and approve extension requests from programs
- Review complaints about programs or peer reviewers to determine the merit of the complaint
- Provide reports to NAEYC as a supporting agency, as appropriate within Council for Higher Education Accreditation (CHEA) Recognition Criteria
- Provide appropriate transparency and accountability to the public through reports on accreditation decisions

The business of Executive Committee meetings may result in recommendations or in motions prepared for full Commission consideration. The Executive Committee cannot make decisions regarding a program's accreditation status. Only the full Commission makes those decisions.

Roles and Responsibilities of the Nomination and Selection Committee

The Commission Nomination and Selection Committee is responsible for the nominations and selection process for new commissioners and for the Chair-Elect. The nomination and selection process includes recruitment, identifying selection criteria, application review, and preparation of the slate of candidates for full Commission vote. The nomination and selection process must reflect the Commission's

commitment to diversity and inclusiveness. The Nomination and Selection Committee responsibilities include

- Present nominations for Chair-elect to the Commission, as needed, in collaboration with the Commission Chair and NAEYC staff. The Committee will make a recommendation no later than six months prior to the end of the chair's term.
- Recruit a slate of candidates for open Commission positions using the Call for Nominations Process and the appointment process
- Review background materials of candidates collected by staff, conduct interviews with candidates focused on confirming interest and qualifications
- Present a slate of recommended candidates to the full Commission for consideration and approval
- Conduct annual review of Commission composition and diversity to identify expertise and diversity needed in new Commissioners
- Conduct work in compliance with relevant sections of this handbook, the *NAEYC Early Childhood Higher Education Accreditation Handbook*, and the *NAEYC Initial & Advanced Accreditation Standards for use by Associate, Baccalaureate, and Graduate Degree Programs*

Roles and responsibilities of the Training and Technical Assistance Committee

The Commission Training and Technical Assistance Committee is responsible for working with the Commission Chair and NAEYC staff to

- Identify areas in which *programs* need training or technical assistance to improve the quality of their reports
- Within Self-Study Reports and Peer Reviewer Reports, identify exemplary assessments, report sections, approaches to report writing or other feedback as part of each Commission meeting
- Identify areas in which *peer reviewers* need training or technical assistance to improve the quality of their reports
- Identify areas for professional development needed within the Commission
- Conduct work in compliance with relevant sections of this handbook, the *NAEYC Early Childhood Higher Education Accreditation Handbook*, and the *NAEYC Initial & Advanced Accreditation Standards for use by Associate, Baccalaureate, and Graduate Degree Programs*

Roles and responsibilities of the Policy and Standards Committee

The Commission Policy and Standards Committee is responsible for working with the Commission Chair and Senior Director to

- Consider new or emerging issues related to accreditation policies and standards. Bring those issues to the attention of the Commission Chair and NAEYC staff.
- Present reports and recommendations for revisions to accreditation and Commission policies to the Commission as a whole, for deliberation and decision
- Respond to issues raised by other Commissioners and referred to this committee
- Conduct work in compliance with relevant sections of this handbook, the *NAEYC Early Childhood higher Education Accreditation Handbook*, and the *NAEYC Initial & Advanced Accreditation Standards for use by Associate, Baccalaureate, and Graduate Degree Programs*
- Periodically review this handbook, the *NAEYC Early Childhood Higher Education Accreditation Handbook*, and the *NAEYC Initial & Advanced Accreditation Standards for use by Associate, Baccalaureate, and Graduate Degree Programs* and generate recommendations for revision presented to the Commission Chair and NAEYC staff, and then, potentially, to the Commission as a whole.

Chapter 4: Expectations of Commission Members

NAEYC Commission Code of Ethics

Trust is the foundation of effective Commission work. As an organization, NAEYC seeks to develop a culture of trust, which is essential for our work to have lasting value. Trustworthiness means that we do what we say we will do, that we are honest, and that we strive for accuracy in the information we share. Trustworthiness is based on *character*, the positive qualities that we possess, and on *competence*, what we can do. To be effective, Commission members must have both character *and* competence.

With trust at the foundation of our work, we have established this code of ethics to guide our work as Commissioners.

As a Commission member I will:

- (a) Fully and enthusiastically support the NAEYC vision, mission, core values and beliefs, strategic priorities and all other Board-adopted policies and fully and enthusiastically support the Higher Education for Early Childhood Accreditation Commission's vision, mission, core values, beliefs and strategic priorities
- (b) Actively participate in, and contribute to, an open, professional culture by respecting and seeking to understand diverse points of view.
- (c) Work to assure that the NAEYC Accreditation of Early Childhood Higher Education Programs system continues to grow as a high-performing, inclusive organization of groups and individuals and using this framework in my Commission deliberations by:
 - i. considering the evidence that diverse points of view are embedded in the process and results of any initiative
 - ii. and considering the impact of any decision on multiple dimensions of diversity, including but not limited to race/ethnicity, culture/language, class, gender, sexual orientation, differing abilities/special needs professional role, program type, education level, age, and geography, and
 - iii. Considering the impact on current staff and leadership.
- (d) Promote the work of the NAEYC Accreditation of Early Childhood Higher Education Programs system to the field and to the public at large, and take ownership of the work we do together.
- (e) Embrace and respect ideas, insights, and concerns that evolve out of the values of diverse cultures and belief systems.
- (f) Represent and serve the needs of NAEYC Accreditation of Early Childhood Higher Education Programs system, *not* a particular geographic region, organization, or constituency.

In my work on the Commission I will:

- (g) adhere to all Commission policies, including but not limited to policies on confidentiality, conflict of interest and inurement prohibition, and anti-corruption.
- (h) Respect and support all decisions of the Commission.
- (i) Work with the other Commission members and members of the staff in the spirit of harmony and cooperation.
- (j) Participate actively in Commission meetings, Commission activities and on committees, and follow through on my Commission commitments, tasks, and responsibilities.
- (k) Make the necessary commitment of time and diligence to fulfill my Commission responsibilities.
- (l) Encourage and participate in open, inclusive, and respectful dialogue regarding all Commission issues, concerns, and discussions.
- (m) Recognize that since the Commission consists of individuals with differing perspectives, debate is necessary and encouraged.
- (n) Be well informed about developments and issues that may come before the Commission.
- (o) Work to learn more about my responsibilities and to improve my effectiveness.
- (p) Keep confidential any proceedings of the Commission that are not yet ready for public dissemination, except where disclosure is required by law.
- (q) Have the courage to offer a minority opinion when necessary and be willing always to listen to, respect, and consider opinions offered by others.
- (r) Speak directly to individuals involved about issues of concern regarding those individuals
- (s) Handle concerns or complaints in a professional manner – directing operational concerns to NAEYC; and directing concerns about policy to the Chair of the Commission.
- (t) Call to the attention of the Commission any issues that may have an adverse impact on NAEYC, the accreditation system or those the Commission serves.
- (u) Act impartially and not seek preferential treatment from or for any organization or individual inside or outside NAEYC.
- (v) During Commission discussions, disclose any potential conflict of interest related to the issue under discussion and exclude oneself from Commission decisions where involved in a conflict of interest.
- (w) Not use Commission position for personal advantage or the advantage of friends or relatives.

Finally, I understand that I must bring any violations of this Code of Ethics, my own or those of another Commission member, to the attention of NAEYC and the Chair of the Commission and that in doing so I am helping to assure the strength and integrity of NAEYC and safeguard the field of early childhood education.

Adherence to the NAEYC Commission Code of Conduct

Prior to assuming office and annually thereafter, each Commission member will review and affirm their commitment to adhering to the NAEYC Commission Code of Ethics.

Complaints Regarding Conduct

It is the responsibility of all NAEYC Governing Board members, committee members, advisory and accrediting body members, volunteers and staff to report suspected violations of fraud, theft, illegal, or other unethical activity.

All staff, Governing Board members, committee members, advisory and accrediting body members and volunteers shall be provided guidelines for reporting unethical, illegal or fraudulent behavior conducted by members of the Governing Board and other NAEYC Governance participants, NAEYC staff, vendors, professional service providers, or affiliated organizations.

These guidelines for reporting will apply to all complaints, allegations, inquiries or submissions (“Complaints”) involving a potential violation of the NAEYC Board Code of Ethics received by NAEYC about a Board member, committee, advisory group and accreditation body member or candidate for election or appointment to any such group, whether initiated by another Board member, an officer, employee, member, or agent of NAEYC, or other third party.

All persons engaged in investigations or decisions on behalf of NAEYC with respect to any complaint reviewed under these Procedures or the Whistleblower and Anti-Fraud Policy Procedures are indemnified and will be held harmless and defended by NAEYC against any liability arising from such activities to the extent permitted by law, provided such individuals act in good faith and with reasonable care, without gross negligence or willful misconduct, and do not breach any fiduciary or other duty owed to NAEYC.

Any individual who (directly or through his or her family or business) has any personal or private business involvement in or connection to the alleged misconduct or has an ongoing, close personal or close professional relationship outside of NAEYC with the Complainant or the Board member or candidate whose conduct is at issue, or any other conflict of interest, will not be permitted to participate in the matter to be reviewed. Any actual, potential or apparent conflict of interest will be immediately disclosed by the affected individual in accordance with the Conflict of Interest and Inurement Prohibition Policy.

For each complaint involving an alleged violation of the Code that the Audit Committee of the Governing Board determines is potentially actionable, such determination will be brought to the Board to determine whether or not the director or other volunteer should be removed pursuant to the bylaws.

Anti-Corruption Policy

As stated in the NAEYC Commission Code of Ethics, obeying the law, both in letter and spirit, is one of the foundations on which NAEYC's ethical standards are built. Members of the Commission must comply with all applicable laws and regulations and encourage and support such behavior in others.

As an organization that operates in places around the world, NAEYC is subject to many anti-corruption and anti-bribery laws, including the U.S. Foreign Corrupt Practices Act. This policy supports the Association's commitment to ethical and legal practices by ensuring compliance with these laws. This policy and its related procedures outline standards and processes to follow to prevent, detect, and respond to bribery and corruption in our activities.

Corruption and bribery have serious ethical and legal implications. Compromising NAEYC's values by engaging in them and failure to comply with this policy can subject the Association and any individuals involved to severe reputational harm, fines, and/or criminal penalties. It is therefore imperative that members of the Commission and NAEYC staff read, understand, and follow this policy.

NAEYC strictly prohibits any form of corruption or bribery and will never engage in corruption or bribery for any reason. This means that, regardless of local custom, we will never give or promise anything of value to anyone to improperly or unethically influence a decision affecting our operations. In addition, regardless of local custom, we will never accept anything of value from anyone to improperly or unethically influence our own decisions.

Please note that "anyone" includes government officials and entities, state owned or controlled companies or entities, as well as private persons and entities. This means that giving a private business person something of value to improperly or unethically influence a decision affecting our operations – for example, a purchasing decision – is considered corruption and bribery, and is therefore prohibited. It also means that giving anything of value to the relatives, spouses, friends, or colleagues of government officials or private persons to improperly or unethically influence a decision affecting our operations is also prohibited.

"Anything of value" includes money, goods, services, contributions, contracts, or other benefits, no matter how small in value.

Corruption and bribery by third parties acting on the Association's behalf are as serious as corruption and bribery by the Association itself. NAEYC must never use a third party to engage in any form of unethical behavior.

Members of the Commission should report concerns pursuant to this policy to the Chief Executive Officer and General Counsel, or through NAEYC's Whistleblower reporting process.

Gifts and Hospitality

Before offering or receiving any type of gift or hospitality in connection with Association activities, the Association requires that members of the Governing Board, committees, advisory groups, accrediting bodies, volunteers and NAEYC staff ensure that they comply with this Policy, the Code of Ethics, and the Association's applicable Travel and Entertainment Policy.

Gifts and hospitality may not be motivated by any improper or unethical purposes, or accompanied by any improper or unethical expectation of receiving anything in return.

The Association may, at times, provide certain types of gifts or other hospitality, including entertainment, meals, travel, or other promotional expenditures to promote its activities and solidify relationships. While often common and socially acceptable, these types of expenditures also can be misused for corruption or bribery.

NAEYC does not consider the giving or acceptance of a token of appreciation, such as a ball cap, tee shirt, jacket, an occasional lunch, game of golf, or the like with non-government officials to be a kickback, gift or gratuity for the purpose of this policy, so long as such is not given to improperly or unethically influence a decision affecting NAEYC and its operations.

Per NAEYC's Guiding Principles for Purchasing, members of the Governing Board, committees, advisory groups, accrediting bodies, volunteers and NAEYC staff must not accept gratuities, favors, gifts, occasional tickets for theater or sporting events or anything else with a monetary value over \$100 from contractors, potential contractors, parties to a sub-agreement or other third parties.

These general rules do not apply to gifts or hospitality provided by NAEYC to members of the Governing Board, committees, advisory groups, accrediting bodies, volunteers and NAEYC staff, provided however that any gifts or hospitality provided by NAEYC to its these individuals must be permissible under all applicable laws, regulations, rules, and Association policies, and may not be used to improperly or unethically influence a decision affecting Association business.

General Rules

All gifts and hospitality provided to anyone must be:

- (a) reasonable in value (not lavish or excessive) when measured by local standards of the recipient;
- (b) permissible under all applicable laws, regulations, and rules;
- (c) infrequent when combined with all those provided to any particular individual, group, or entity;
- (d) provided in a manner that would not result in embarrassment to the Association if publicly disclosed;
- (e) given openly and transparently with no appearance of impropriety;
- (f) given without any improper expectation of reciprocity, explicit or implied obligation, favor, or action in return; and
- (g) accurately recorded in the Association's books and records.

Gifts and hospitality must not be:

- (a) provided in cash or cash equivalents, such as gift certificates, stocks, loans, or per diem payments;
or
- (b) provided in the form of luxury items or vacations.

Private Persons, Groups, or Entities

Gifts and hospitality provided to private persons, groups, or entities may be provided only if related to the conduct of Association operations and efforts to improve our image.

Government Officials or Entities

Gifts or hospitality provided to government officials must be approved in advance by the Executive Director, Deputy Executive Director for Finance and Operations and General Counsel. Any questions about the appropriateness or reasonableness of a gift or hospitality should be directed to the General Counsel.

Gifts and hospitality to government officials may be provided only if directly related either to the promotion, demonstration, or explanation of the Association's products or services, or to the execution or performance of a contract with a government or government agency, or if required under written local laws or regulations.

Please note that providing gifts or hospitality to government officials may be subject to additional laws or regulations in the locale in which you or the recipient operate. For example, local law may place a limit on the value of gifts given to a government official. Please check with the General Counsel for guidance.

"Government officials" include any official or employee of any government or department, agency, or instrumentality of any government; officer or employee of any government-owned or government-controlled company; official or employee of any public international organization (for example, the United Nations, World Bank, or International Monetary Fund); official or employee of any political party; or anyone, whether a private person or otherwise, acting in an official capacity on behalf of any of the above.

"Government entities" include any government; public international organization (for example, the United Nations, World Bank, or International Monetary Fund); department, agency, or instrumentality of any non-U.S. government or of any public international organization; or company, entity, or other organization owned or controlled by, or acting in an official capacity on behalf of, any of the above.

Relatives, Spouses, Friends, and Colleagues

Relatives, spouses, friends, and colleagues of government officials or private persons may not be provided with gifts, entertainment, meals, travel, and other types of promotional expenditures without an independent, legitimate reason for doing so.

Development and Strategic Alliances

Charitable donations and Strategic Alliances can enhance the Association's activities, but also may pose corruption risks if made improperly. Donations and sponsorships must never be made to improperly or unethically influence a decision affecting our operations. They must be permissible under all applicable laws, regulations, and rules; given openly and transparently with no appearance of impropriety; and accurately recorded in the Association's books and records. Nothing in this section is intended to

discourage or prevent any employee from making donations on his or her own personal behalf, as long as the donations are not linked, or reasonably perceived to be linked, to the Organization.

Any questions about the appropriateness or reasonableness of a gift or Strategic Alliance should be directed to the Executive Director and General Counsel.

Facilitating Payments

Facilitating Payments are small payments made to secure or expedite the performance of a routine action by a government official or agency (e.g., issuing licenses or permits, installation of a telephone line, processing goods through customs, etc.) to which NAEYC has legal or other entitlement. Although some anti-corruption laws provide a narrow exception for Facilitating Payments, NAEYC prohibits Facilitating Payments without prior written approval from the Executive Director, Deputy Executive Director for Finance and Operations, and General Counsel.

Books and Records

To comply with global anti-corruption and anti-bribery laws, NAEYC must maintain books, records, and accounts in reasonable detail that accurately and fairly reflect its transactions. The scope of maintaining accurate and detailed books, records, and accounts is broad and includes financial records, accounting records, memoranda, tapes, recordings, discs, digital storage devices, papers, and other documents.

All employees are responsible for:

- (a) recording transactions accurately, transparently, and in a timely manner;
- (b) using sufficient detail to describe transactions;
- (c) documenting and properly supporting transactions; and
- (d) retaining all supporting documentation for transactions in accordance with Association policy and all applicable local laws, regulations, and requirements.

It is NAEYC's policy to maintain a system of internal accounting controls that:

- (a) provides assurances that transactions are executed with proper authorizations;
- (b) properly records transactions to permit financial statements conforming with generally accepted accounting principles;
- (c) aligns access to assets with proper authorizations; and
- (d) compares accountability for assets with existing assets at reasonable and regular intervals, and accounts for differences properly.

The General Counsel will provide a report to the Audit Committee of the NAEYC Governing Board regarding matters that arise pursuant to the NAEYC Anti-Corruption Policy or Procedure.

Whistleblower and Anti-Fraud Policy

The purpose of this policy is to promote consistent, legal, and ethical behavior and to provide all members of the Governing Board, committees, advisory and accreditation bodies and volunteers with

procedures for reporting unethical, illegal, or fraudulent behavior conducted by the NAEYC members of the Governing Board and other NAEYC Governance participants, NAEYC employees, vendors, consultants, affiliated organizations or others that have a relationship with NAEYC. Unethical, illegal, or fraudulent situations may pertain to:

- (a) Fraudulent or negligent accounting
- (b) Misappropriation or misuse of resources/funds
- (c) Conflicts of interest
- (d) Breaches of confidentiality
- (e) Harassment or discrimination
- (f) Safety or security hazards
- (g) Theft

All representatives of NAEYC must practice integrity in fulfilling their responsibilities and comply not only with all applicable laws and regulations, but also with all approved NAEYC policies and procedures. NAEYC staff are expected to comply with the NAEYC staff Whistleblower and Anti-Fraud Policy and procedure set forth in the NAEYC Employee Handbook.

Whistleblower and Anti-Fraud Procedure

Members of the Governing Board, committees, advisory groups and accreditation bodies who suspect improprieties and/or misconduct are encouraged to share their questions, concerns, suggestions, or complaints with the Chief Executive Officer and NAEYC Governing Board President or General Counsel.

Accounting and Financial Matters

The Executive Director, Deputy Executive Director for Finance, and General Counsel will address all reported concerns or complaints regarding corporate accounting practices, internal controls, or financial matters. The General Counsel will notify the Audit Committee of any such complaint and work with the appropriate parties until the matter is investigated and resolved.

Legal and Policy Violations

The President and Executive Director, in conjunction with the General Counsel, will address all reported concerns or complaints regarding illegal and inappropriate conduct pertaining to policy violations. The senior director of Human Resources will immediately notify the Executive Director of any such complaint, and the Executive Director will work with the General Counsel until the matter is resolved. The General Counsel will notify the Audit Committee of any such matters.

Anonymous Reporting

NAEYC representatives who are more comfortable reporting their concerns to a neutral third party may do so by calling or emailing a third-party reporting organization resource that allows complainants to report their concerns anonymously by phone or via the Internet. It is toll-free and Internet accessible around the clock every day. To report suspected violations to NAEYC's current neutral third-party contractor, Ethics Point, please visit <https://secure.ethicspoint.com/domain/media/en/gui/23477/index.html> or call 1-877-228-5407.

When an individual contacts the neutral third-party organization, a trained communication specialist, who does not work directly for NAEYC, asks a series of questions to better understand the nature of the concern. The specialist prepares a report that is forwarded to designated NAEYC representatives for review, and if necessary, an investigation is conducted.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously through the third-party reporting organization. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate and thorough investigation of the complaint.

Final Reporting

In all cases, the complainant will be notified of the results of the investigation. The Audit Committee will be advised of all reports on financial, accounting, legal or policy matters. The Executive Committee will be advised of all reports on personnel matters.

Reporting Responsibility

It is the responsibility of all members of the NAEYC Governing Board, committees, advisory and accreditation bodies and volunteers, to comply with this policy and to report suspected violations of fraud, theft, illegal activity, or other unethical activity.

No Retaliation

No NAEYC representative who in good faith reports a violation of this policy will suffer any form of retaliation or adverse consequence. NAEYC employees or representatives who retaliate against someone who has reported a violation in good faith are subject to discipline up to and including termination of employment or suspension or removal in the case of members of the Board, committees, advisory and accreditation bodies. This policy is intended to encourage and enable representatives and others to raise serious concerns within NAEYC prior to seeking resolution outside of NAEYC.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of fraudulent, improper, or illegal activity must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the NAEYC's policies and procedures. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Confidentiality Policy

In connection with service on the Governing Board, its committees, advisory groups and accrediting bodies, or volunteer service, individuals may be exposed to or have access to certain NAEYC confidential and proprietary information (collectively "Confidential Information"). Confidential Information may include, but is not limited to, information on matters involving NAEYC strategic initiatives and activities, real estate holdings, affiliate relations, accreditation matters, finances, legal issues and the policies of and managerial and administrative operations of NAEYC.

Board, committee, advisory group or accrediting body members and any other NAEYC volunteers, will annually explicitly agree to the following:

- (a) To respect and maintain the confidentiality and integrity of Confidential Information.
- (b) To not disclose Confidential Information, or cause it to be disclosed, in any manner to any person or entity other than specifically authorized and designated NAEYC persons, under any circumstances (including after their term of service ends), without the express and authorized permission of the NAEYC President or Executive Director.
- (c) To keep all Confidential Information in a secure place, and take all reasonable steps to protect it against inadvertent disclosure, loss, or theft.
- (d) Upon completion or termination of their term of service to (a) promptly return all Confidential Information in their possession or under their control, and/or (b) stipulate in writing that all Confidential Information has been properly destroyed and discarded, as NAEYC directs.

Process for Confidentiality Procedure

Candidates who are finalists for the Accreditation Commission will submit a signed form attesting to their willingness to comply with this policy prior to their interview with the Nominating Committee. Once elected, Commissioners will submit a signed form annually (by no later than December 31).

Conflict of Interest and Inurement Prohibition

The purpose of the Conflict of Interest and Inurement Prohibition is to ensure that members of the Governing Board and its volunteer committees, commissions, advisory bodies (including those relating to accreditation), NAEYC corporate officers and certain Key Employees (as defined by the IRS) act in NAEYC's best interest and comply with applicable legal requirements. This policy is also intended to protect the interests of NAEYC when it is contemplating entering into a transaction or arrangement that might benefit the private interest of certain Related Parties of NAEYC (private inurement) or that might result in a possible "excess benefit transaction" as defined under section 4958 of the Internal Revenue Code of 1986, as amended.

In keeping with the NAEYC Board Code of Ethics, members of the Governing Board and NAEYC volunteers serving in the NAEYC Governance capacity will exercise the utmost good faith in all transactions relating to their duties at NAEYC. In their work with and on behalf of NAEYC, they will be held to a strict rule of honest and fair dealing. They will not use their positions, or knowledge gained, in such a way that a material conflict, real or apparent, would arise between the interest of NAEYC and that of the individual.

This policy is intended to supplement, but not replace, the NAEYC Board Code of Ethics and other related Governing Board policies and procedures, as well as applicable state and federal laws governing conflict of interest applicable to nonprofit and charitable organizations. This is designed to be compliant with the standards for conflict of interest policies as referenced in IRS Forms 1023 and 990 and consistent with the requirements of the Illinois Nonprofit Corporation Act (the "Act").

NAEYC staff are expected to comply with the NAEYC Conflict of Interest and Inurement Prohibition policy and procedure set forth in the NAEYC Employee Handbook, provided, however, that conflicts involving NAEYC staff who are Key Employees or Corporate Officers must be reviewed in accordance with the

Governing Board Conflict of Interest and Inurement Prohibition Procedure rather than the NAEYC staff Conflict of Interest and Inurement Prohibition Procedure.

Conflict of Interest and Inurement Prohibition Procedure

This Conflict of Interest Procedure provides a process through which potential transactions involving or related to Governing Board members and its Committee Volunteers, NAEYC Corporate Officers, and Key Employees can be reviewed and considered, keeping NAEYC's best interests and applicable legal requirements in mind.

A Potential Conflict of Interest arises when a Related Party's obligation to further NAEYC's mission and to act for the benefit of NAEYC is otherwise at odds with such Related Party's own interests. Although Potential Conflicts of interests may exist from time to time, such instances must not adversely influence the welfare of NAEYC. If there is any uncertainty, a Covered Person is encouraged to treat the situation as a Potential Conflict of Interest.

Due to the potential legal and reputational risks involved with Potential Conflicts of Interest, NAEYC must not enter into any such transaction unless the transaction is determined by the General Counsel, Executive Director and Board President or the Audit Committee, as applicable, to be fair, reasonable and in NAEYC's best interest at the time of such determination. NAEYC is required to disclose information related to conflicts of interest to the IRS as well as to various state consumer protection agencies on an annual basis as part of NAEYC's public disclosure filings.

For purposes of the Governing Board the Conflict of Interest and Inurement Prohibition Policy and Procedure, the following definitions apply:

"Corporate Officer" means an individual who is a corporate officer of NAEYC as defined in the NAEYC bylaws or appointed by Board resolution. Corporate Officers are the President, Vice President, Secretary and Treasurer.

"Covered Person" means any Director, Committee Volunteer, NAEYC Corporate Officer or Key Employee.

"Director" means an individual who is serving his or her term on the NAEYC Governing Board, regardless of voting status.

"Committee Volunteer" includes an individual who is serving his or her term on the Council on Accreditation, the Commission on the Accreditation of Early Childhood Higher Education Programs and the Affiliate Council, or an individual who is a volunteer member of a Governing Board Committee (Finance, Audit, etc).

"Key Employee" is any employee who is in a position to exercise substantial influence over the affairs of NAEYC and is identified as a "Key Employee" on NAEYC's annual IRS information return, form 990.

"Related Party": Any (i) Covered Person; (ii) Relative of any Covered Person; or (iii) entity in which any individual described in (i) or (ii) has a 35% or greater ownership or beneficial interest or, in the case of a partnership or professional corporation, a direct or indirect ownership interest in excess of 5%.

"Relative" means an individual's spouse (or domestic partner), ancestors, brothers and sisters (whether whole or half-blood), children (whether natural or adopted), grandchildren, great-grandchildren, and spouses of brothers, sisters, children, grandchildren and great-grandchildren. A **"domestic partner"** includes any person (i) with which the Related Party is in a domestic partnership or similar relationship

pursuant to any federal, state or local law or law of a foreign jurisdiction or registered as a domestic partner of the Related Party under any employer registry or registry of any state, municipality or foreign jurisdiction; (ii) who is recognized as a beneficiary or Related Party under the Related Party's employment benefits or health insurance or under whose employment benefits or health insurance the Related Party is recognized as a beneficiary or Covered Person; or (iii) who is dependent or mutually interdependent on the Related Party for support or upon whom the Related Party is dependent or mutually interdependent for support.

Annual Disclosure

On an annual basis, all Covered Persons must complete and submit a Confidentiality, Conflict of Interest, and Intellectual Property Agreement. The Board Administrator will provide this Agreement to Covered Persons in September of each year. The Agreement must be returned to the Board Administrator by October 31 of each year, and will be kept on file with the Board Administrator.

Disclosure of Potential Transactions

Potential Conflicts of Interest must be disclosed to the General Counsel, Executive Director or Board President for review and consideration. The General Counsel, Executive Director and Board President together will determine which Potential Conflicts of Interest will be submitted the Audit Committee of the Governing Board for additional review and consideration.

A "Potential Conflict of Interest" may arise when:

- (a) A Related Party has a financial or other interest in a transaction or arrangement of NAEYC;
- (b) A Related Party received compensation for services, directly or indirectly, from NAEYC;
- (c) A Covered Person or a Relative of a Covered Person is an Officer, Director, trustee, member, owner or employee of any entity with which NAEYC has a relationship, examples of which may include:
 - i entities accredited, or under review for accreditation, by NAEYC;
 - ii entities supplying goods or services to or purchasing goods or services from NAEYC;
 - iii entities leasing property or equipment to NAEYC;
 - iv competing organizations or organizations with divergent;
 - v donors and other supporters; or
 - vi agencies, organizations and associations that affect the operations of NAEYC.
- (d) A Covered Person's obligation to further NAEYC's purposes and to act for the benefit of NAEYC is otherwise at odds with such Covered Person's own interests, such as through personal relationships with Relatives, friends and employees with which NAEYC has a relationship or who represent the types of entities listed above.

Disclosure Process

Promptly upon becoming aware of any Potential Conflict of interest, a Covered Person must disclose such to the General Counsel, Executive Director, or Board President by submitting all material facts in written or electronic form.

The below disclosures will be made, as appropriate:

- (a) Prior to the Related Party first becoming associated with NAEYC, including prior to a Governing Board member's election or appointment;
- (b) At the time the Related Party acquires the financial or other interest giving rise to the potential conflict of interest;
- (c) At the time of the Related Party's annual disclosure statement; and
- (d) At the time the Related Party learns that NAEYC is considering a transaction or arrangement in which such Related has a potential conflict of interest.

If the Related Party is the General Counsel, Executive Director, or Board President, disclosure will be made directly to the Audit Committee. If the Related Party is on the Audit Committee, he or she must recuse himself or herself from such deliberations.

The General Counsel, Executive Director and Board President will review any Potential Conflict of Interest, conduct appropriate due diligence (including discussing the matter with the Related Party) and determine how to mitigate the Potential Conflict of Interest. Such determinations will be kept on file with the Board Administrator.

When considering whether to proceed with a Potential Conflict of Interest transaction, the General Counsel, Executive Director and Board President must consider alternative transactions or approaches (such as recusal of the Related Party).

The General Counsel, Executive Director and Board President collectively will determine which Potential Conflicts of Interests will be submitted to the Chair of the Audit Committee for review and consideration at a meeting of the Audit Committee. The Related Party may request to join such meeting or join the meeting at the request of the Audit Committee Chair, in order to provide any additional information about the potential conflict of interest. In no event will the Related Party improperly influence the deliberations or voting on the matter giving rise to the Potential Conflict of interest.

After disclosure of the Potential Conflict of Interest and all material facts, and after any discussion with the Related Party, he/she will leave the Audit Committee meeting while the determination of a Conflict of Interest is discussed and voted upon.

When considering whether to proceed with a Potential Conflict of Interest, the Audit Committee must consider alternative transactions or approaches (such as recusal of the Related Party).

Violations of the Conflict of Interest and Inurement Prohibition Policy

If the Audit Committee has reasonable cause to believe that a Related Party has failed to disclose an actual or potential conflict of interest, it will inform such person of the basis for such belief and afford the Related Party an opportunity to explain the alleged failure to disclose. If, after hearing the Related Party's response and after making further investigation as warranted by the circumstances, the Audit Committee determines the Related Party has failed to disclose an actual or potential conflict of interest, it will refer the matter for corrective action in accordance with the Complaints Regarding Board Conduct policy.

Records of Proceedings

The record of the review and determination of a Potential Conflict of Interest by the General Counsel, Executive Director and Board President will be kept on file with the Board Administrator and will contain the following information:

- (a) The names of the persons who disclosed or otherwise were found to have an actual or Potential Conflict of Interest, the nature of the interest, any action taken to determine whether a conflict of interest was present, and the decision as to whether a conflict of interest in fact existed;
- (b) The names of the persons who were present for discussions and the content of the discussion, including any alternatives to the proposed transaction or arrangement;
- (c) If the General Counsel, Executive Director and Board President approve proceeding with a transaction with a Related Party, a statement that the transaction was found to be “fair, reasonable and in NAEYC’s best interest at the time of such determination,” along with the basis for approval.

The minutes of the Audit Committee meeting in which a Potential Conflict of Interest is being considered will be prepared on a contemporaneous basis and will contain the following information:

- (a) The names of the persons who disclosed or otherwise were found to have an actual or Potential Conflict of Interest, the nature of the interest, any action taken to determine whether a conflict of interest was present, and the Audit Committee’s decision as to whether a conflict of interest in fact existed;
- (b) The names of the persons who were present for discussions and votes relating to the transaction or arrangement, the content of the discussion, including any alternatives to the proposed transaction or arrangement, and a record of any votes taken in connection with the proceedings; and
- (c) If the Audit Committee approves proceeding with a transaction with a Related Party, a statement that the transaction was found to be “fair, reasonable and in NAEYC’s best interest at the time of such determination” along with the basis for the approval.

Equal Opportunity Policy

NAEYC provides equal opportunity to all volunteers and qualified employees as well as applicants for employment or volunteer service without regard to race, color, religion, sex, national origin, age, marital status, personal appearance, sexual orientation, gender identity or expression, familial status, family responsibilities, matriculation, political affiliations, physical or mental disability, source of income, place of residence or business, or any other basis prohibited by federal, state, or local law.

Anti-Harassment and Anti-Bullying Policy

Each volunteer is responsible for ensuring that NAEYC provides experiences that are free from harassment, and volunteers may be disciplined, up to and including termination, for any violation of this policy. **This is a zero-tolerance policy.**

Harassment is defined as unwelcome verbal, written or physical conduct relating to another person’s race, color, religion, sex, national origin, age, marital status, personal appearance, sexual orientation, gender

identity or expression, familial status, family responsibilities, matriculation, political affiliations, physical or mental disability, source of income, place of residence or business, or any other basis prohibited by federal, state, or local law.

Harassment includes, but is not limited to the following examples:

- (a) Epithets, slurs, or negative stereotyping
- (b) Threats
- (c) Intimidating or hostile acts
- (d) Denigrating jokes
- (e) Displays of written or graphic material that denigrates or shows hostility or aversion toward an individual or group
- (f) Bullying (see Anti-Bullying Policy)

With respect specifically to sexual harassment, all employees must avoid any action or conduct which is, or could be viewed as, illegal conduct. Sexual harassment involves unwelcome;

- (a) sexual advances,
- (b) requests for sexual favors,
- (c) other verbal, written, or physical conduct of a sexual nature, or
- (d) gender-based harassment when:
 - i. Submission to such conduct is made a term or condition of an individual's employment, either explicitly or implicitly;
 - ii. Submission to, or rejection of, such conduct by an individual is used as the basis for any employment decision affecting that individual; or
 - iii. Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creates an intimidating, hostile, or offensive working environment.

Because the standards as to what is prohibited conduct are not precise, NAEYC intends to eliminate all conduct that even arguably could be claimed to be illegal. As a result, conduct that is unprofessional and improper that must be eliminated includes, but is not limited to, the following:

Any subtle or other pressure for sexual favors, including any suggestion that an applicant's or employee's giving in to, or rejecting, sexual advances will have an effect on the individual's employment or terms of employment.

- (a) Unwelcome sexual advances, including flirtations or propositions
- (b) Verbal, visual, or physical conduct of a sexual nature
- (c) Verbal abuse of a sexual nature
- (d) Racial or sexual jokes
- (e) Jokes that demean any ethnic or other protected group
- (f) Repeated remarks of a sexual nature
- (g) Displaying sexually suggestive pictures, drawings, cartoons, or objects

- (h) Degrading comments about an individual's appearance, including his or her body
- (i) Any uninvited, unwelcome, and/or unnecessary touching, including patting, or repeated brushing against, another person's body
- (j) Sexually explicit or offensive jokes
- (k) Use of profanity
- (l) Viewing or downloading offensive or pornographic materials from the Internet, including emails or distributing or displaying sexual materials, including jokes received by email

No Commission member, supervisor or manager is authorized, or has the power, to grant, deny, or withhold any promotion or other benefit or otherwise to affect any NAEYC employee's or volunteer's status in any way, on the basis of that individual's granting or refusing to give sexual favors.

Anti-Bullying Policy

NAEYC will not tolerate bullying. Bullying is defined as aggression, intimidation, or abuse against a coworker, including subordinates, whether direct or indirect, and may be verbal, physical, or electronic (cyber-bullying). Commission members found in violation of this policy will be subject to the procedures for responding to concerns of Commission member conduct. Some examples of bullying include:

- (a) **Verbal Bullying:** Repeated slandering, ridiculing, or maligning another person or his or her family; persistent name calling that is hurtful, insulting, or humiliating; abusive or offensive remarks
- (b) **Physical Bullying:** Pushing, shoving, kicking, poking, tripping, assault, or threat of physical assault; damage to a person's work area or property
- (c) **Gesture Bullying:** Nonverbal threatening gestures, glances that convey threatening or intimidating messages
- (d) **Sabotage Bullying:** Behaviors intended to sabotage and prevent others from getting work done
- (e) **Exclusion Bullying:** Socially or physically excluding or disregarding a person in work-related activities for improper purposes.

Acceptable Use of NAEYC Information Technology

This policy applies to the use of any NAEYC computer (desktop or laptop), tablet, networks (wired and wireless), telecommunications devices (wired and wireless), software (cloud-based or downloadable) and storage media (disks, CDs, USB drives, external drives, or cloud-based) (the "**Hardware**") by any NAEYC employee, contractor, volunteer, consultant, or any other person (each a "**User**") who is provided with access to NAEYC's systems or information ("**NAEYC IT**"). This policy also addresses any personal computer (desktop or laptop), tablet, telecommunications devices (wired and wireless), software (cloud-based or downloadable) and storage media (disks, CDs, USB drives, external drives, or cloud-based) ("**Personal IT**") used by any User who uses the IT for NAEYC business.

Privacy and Monitoring

Users should have no expectation of privacy while accessing NAEYC IT. All NAEYC IT is the property of NAEYC. In order to implement NAEYC's information security program effectively and enforce NAEYC policies, NAEYC must have the ability to monitor the use of NAEYC IT. NAEYC may monitor any activity on hardware that is using or accessing NAEYC IT.

Use for Business Purposes

NAEYC IT is to be used to conduct NAEYC business. However, occasional non-business use of NAEYC IT, in compliance with this policy, is acceptable. Limited, non-business use of NAEYC IT must be reasonable and respectful and may not interfere with the conduct of NAEYC business or violate NAEYC policies or applicable law. Examples of acceptable, limited, non-business use of NAEYC IT include brief personal phone calls, emails, or "web surfing" that do not interfere with a User's work.

Board members, volunteers, or other users of NAEYC IT:

- (a) May not engage in illegal, threatening, discriminatory, defamatory, slanderous, obscene, or harassing activity through the use of NAEYC IT
- (b) May not use NAEYC IT to solicit for any reason or for sending mass emails ("spamming") unless such activity is authorized by the Executive Director
- (c) May not use NAEYC IT to infringe on intellectual property rights, copyrights, trademarks, or other licensing restrictions
- (d) May not install or use any software unless it is approved by NAEYC IT Department
- (e) May not knowingly create, execute, forward, or introduce any malicious computer code (such as viruses, Trojans, or worms) into NAEYC IT
- (f) May not disable any anti-virus or any other security software

Use of Email, Text Messaging, and Technology Electronic Communications

Electronic communications such as email and text messages (collectively, "Electronic Messaging") must be treated carefully. These electronic messages can be misdirected or misinterpreted causing damage to NAEYC, its members, employees, and others. NAEYC email and text messaging technology do not provide data privacy while in transit over networks. Unless explicitly approved by the IT Department, Users are not permitted to use Electronic Messaging to send or receive sensitive information that requires privacy protections.

Return of NAEYC IT

Users of NAEYC IT must return all NAEYC IT upon request or at the conclusion of the User's relationship with NAEYC, including NAEYC equipment used in telecommuting.

Connecting to NAEYC or Other Networks

Remote access to NAEYC network, excluding access to NAEYC emails, will only be from devices approved by the IT Department. Users should exercise their best efforts to protect their NAEYC passwords from disclosure and prevent unauthorized access to NAEYC IT. Accounts and passwords are for individual use only.

Acceptable Use of NAEYC Information Technology Procedure Device Protocols

All Commission members using NAEYC IT have mobile device management (MDM) software installed through Google. This MDM software will store all NAEYC-related information, including calendars, emails, and other applications in one area that is password-protected and secure.

Commission members may store NAEYC-related information only in this area through NAEYC Google Enterprise. Commission members may not use cloud-based apps or backup that allows NAEYC-related data to be transferred to unsecure parties. Making any modifications to the device hardware or software beyond authorized and routine installation updates is prohibited unless approved by the IT Department. Commission members may not use unsecure Internet sites on NAEYC devices.

Personal devices should be turned off or set to silent or vibrate mode during meetings and conferences and in other locations where incoming calls may disrupt the workplace.

Restrictions on Authorized Use

While engaged in NAEYC-related activities, Commission members and volunteers are expected to exercise the same discretion in using their personal devices as is expected for the use of NAEYC IT. NAEYC policies pertaining to harassment, discrimination, retaliation, trade secrets, confidential information, and ethics apply to Board member and volunteer use of personal devices for NAEYC-related activities. Family and friends should not use Personal IT that is used for NAEYC purposes.

Privacy and Monitoring

No Commission member or volunteer using his or her Personal IT for NAEYC business purposes should expect any privacy except that which is governed by law. NAEYC has the right, at any time, to monitor and preserve any communications that use the NAEYC's networks in any way, including data, voice mail, telephone logs, Internet use, and network traffic, to determine proper use.

NAEYC reserves the right to review or retain Personal IT NAEYC-related data on personal devices or to release the data to government agencies or third parties during an investigation or litigation. NAEYC may review the activity and analyze use patterns and may choose to publicize these data to ensure that NAEYC's resources in these areas are being used according to this policy. Furthermore, no Commission member or volunteer may knowingly disable any network software or system identified as a monitoring tool.

Safety

Commission members and volunteers are expected to follow applicable local, state, and federal laws and regulations regarding the use of NAEYC electronic devices at all times.

Lost, Stolen, Hacked, or Damaged Equipment

Commission members and volunteers are expected to protect personal devices used for NAEYC-related purposes from loss, damage, or theft. Commission members and volunteers must have password protected Personal IT used for NAEYC purposes.

NAEYC will not be responsible for loss or damage of personal applications or data resulting from the use of NAEYC applications or the wiping of NAEYC information.

Use of Social Media

Commission members are expected to use social media responsibly and to consider how its usage may reflect on NAEYC. These guidelines are consistent with the expectations outlined within the NAEYC Commission Code of Ethics. Specifically, when using social media, Commission members and other volunteers must:

- (a) Never make inappropriate statements that may include discriminatory remarks, harassment, and threats of violence or similar inappropriate or unlawful conduct. Such actions will not be tolerated and may subject the Commission member or volunteer to disciplinary action.
- (b) Always be fair and courteous to fellow Commission members, Governing Board members, employees, members, clients, customers, vendors, suppliers, and others who work on behalf of NAEYC.
- (c) Avoid using statements, photographs, video, or audio that reasonably could be viewed as malicious, obscene, threatening, or intimidating, that disparage other NAEYC Commission members, Governing Board members, employees, clients, customers, vendors, or suppliers, or that might constitute harassment or bullying.
- (d) Be honest and accurate when posting information or news related to NAEYC. Never post any information or rumors known to be false about NAEYC, fellow Commission members, Governing Board members, employees, clients, customers, vendors, suppliers, people who work on behalf of NAEYC, or competitors.
- (e) Maintain the confidentiality of NAEYC trade secrets and private or confidential information. Trade secrets may include information regarding the development of systems, processes, products, know-how, and technology. Commission members may not post reports, policies, procedures, or other internal business-related confidential communications received through Commission service.
- (f) Not create a link from their blog, website, or other social networking site to an NAEYC website without identifying themselves as a Commission member.
- (g) Never represent themselves as spokespeople for NAEYC unless so designated by the President or Chief Executive Officer. This prohibition does not prevent Commission members or volunteers from identifying themselves as a Commission member, but they must clearly identify when they are representing an NAEYC position and when they are representing their own viewpoint or that of another organization.

Political Activity

NAEYC's status as a tax-exempt organization, qualifying as a public charity, under Section 501(c)(3) of the Internal Revenue Code prohibits it from participating or intervening in any political campaign on behalf of (or in opposition to) any candidate for public office (national, state, or local). Participation in political campaigns by or in the name of NAEYC could jeopardize NAEYC's tax-exempt status. NAEYC is a 501(h) elector and all activities must comply with such election.

Commission members and other volunteers working on behalf of NAEYC are prohibited from using NAEYC office spaces, office supplies, telephones, computers, email, fax, or photocopying for any prohibited political campaign activity.

This prohibition means that, to the extent permitted by law, Commission members and other volunteers:

- (a) May not distribute statements on behalf of (or in opposition to) any candidate for public office (national, state, or local).
- (b) May not make direct campaign contributions of NAEYC funds (including in-kind or non-cash contributions) to a public candidate, political party or political action group.
- (c) May not fundraise on behalf of, or contribute to, any political campaign in the name of NAEYC or at an NAEYC facility or NAEYC event.
- (d) May not make political statements in emails where the signature block implies employees may be acting as an NAEYC representative.
- (e) May not use NAEYC resources or funds for any political participation.
- (f) May not post campaign posters or political signs, or distribute campaign materials on NAEYC property or as a representative of NAEYC.
- (g) May not provide any information about any NAEYC member or any other purchaser of NAEYC services to any political campaign. (See Confidentiality policy)
- (h) May not wear any apparel or accessory that endorses a political candidate on NAEYC property, at any NAEYC-sponsored events, or as a representative of NAEYC.

This policy is not intended to restrict Commission members' free expression on political matters in their private capacity as individuals. If they choose to do so, Commission members should feel free to participate in political campaigns when not doing Commission work, exercise their rights to make political contributions by using their own personal funds, volunteer for political campaigns on their own time, and vote. Commission members should be careful that their own personal political activities cannot be perceived as being in their NAEYC capacity or attributable to NAEYC.

Drug, Smoke-Free, and Secure Workplace

NAEYC is committed to protecting the safety, health, and well-being of all employees and other individuals in the workplace. Alcohol abuse and drug use can pose a significant threat to our goals. NAEYC has established a drug-free workplace program that balances our respect for individuals with the need to maintain a drug-free environment. NAEYC encourages employees to voluntarily seek help with drug and alcohol problems.

Any individual who conducts business for or represents NAEYC, is applying for a position, or is conducting business on the organization's property is covered by our drug-free workplace policy. This policy applies during all working hours, whenever an individual is conducting business or representing NAEYC, whether on NAEYC property or elsewhere.

It is a violation of our drug-free workplace policy to use, possess, sell, trade, and/or offer for sale alcohol, illegal drugs, marijuana or intoxicants, except that alcohol may be served at NAEYC-sponsored events or functions when approved by the Chief Executive Officer.

Smoke-Free Workplace Policy. NAEYC is a smoke-free workplace. Smoking in front of the building is strongly discouraged.

Secure Workplace Policy. NAEYC is concerned with protecting the health and providing for the safety and security of everyone at NAEYC. NAEYC also wants to protect its property and facilities. As a result, NAEYC wants to prevent anyone from:

- (a) Bringing drugs, alcohol, weapons, and/or other unauthorized or illegal substances or materials onto NAEYC premises or facilities, as described in our Drug-Free Workplace Policy.
- (b) Taking or removing equipment, materials, files, and/or other property without authorization.
- (c) Intentionally damaging any property.

In order to do this, NAEYC expressly reserves the right, in its discretion:

- i. To question any person at any time while entering or leaving NAEYC premises or facilities.
- ii. To search or inspect the vehicle, desk, locker, containers, handbags, briefcases, packages, parcels, and personal belongings of any person on the premises.
- iii. To search any NAEYC vehicle or any personal vehicle used by an employee or Commission member on NAEYC business, at any time

Intellectual Property Policy

If a NAEYC Commission member writes or creates something while working in his or her capacity as a NAEYC Commission member, NAEYC owns the intellectual property rights. Any questions about ownership should be raised with the President, Chief Executive Officer or General Counsel in advance of the writing or creation.

Chapter 5: Conduct of Commission Business

The following section outlines the policies and practices the Commission follows when conducting its work. The Commission recognizes that as an organization it has a distinct culture that is sometimes visible and sometimes invisible. In the spirit of transparency, Appendix A attempts to make visible key cultural values and practices of the Commission.

General annual meeting schedule

The Commission meets at least three times a year, at regular intervals. Commission dates for the next three meetings are confirmed as part of the agenda for each meeting. The typical annual meeting schedule and content is as follows:

- Winter: Typically occurs in February or early March for approximately three days. This meeting is a physical meeting held at the NAEYC national office. At this meeting the Commission makes accreditation decisions on programs that had site visits the previous fall as well as may make decisions on programs Accredited with Conditions (as needed).
- Summer: Typically occurs in June for approximately three days. This meeting is a physical meeting held at the NAEYC national office. At this meeting the Commission makes accreditation decisions on programs that received site visits the previous spring and makes decisions on programs currently Accredited with Conditions that submitted spring Annual Reports.
- Fall: Typically occurs in October for approximately one day. This is a virtual meeting. At this meeting the Commission makes decisions on programs currently Accredited with Conditions that submitted fall Annual Reports. Voting may be conducted through electronic poll, telephone conference, or video conference.

Specific meeting dates are set by the Commission Chair, are confirmed one year in advance (as possible) during each Commission meeting, and may be adjusted in order to ensure a quorum. The Commission may make policy decisions or recommendations at any meeting. The chair can call additional meetings, as needed, to meet the demands of the accreditation decision workload and to address other issues related to maintaining a high quality accreditation system.

Commission Attendance

Commissioners are expected to attend every meeting with exceptions due to illness, a significant life event (e.g. family wedding, child's graduation, funeral) or a mandatory work obligation. Meetings are scheduled several months to a year in advance to facilitate Commissioners in making arrangements to have their professional and personal obligations covered while they attend each Commission meeting. If a Commissioner anticipates needing to miss all or part of a Commission meeting, he/she should notify the Commission chair as soon as possible to discuss the reason. The chair will work with the Commissioner to identify the impact the absence might have on the Commission meeting and how to manage the Commissioner's assigned cases. In cases where a Commissioner will miss part of a Commission meeting, he or she is still expected to review assigned cases and contribute to their

assigned panel. In cases where a Commissioner will miss a full or part of a meeting, the chair will determine the most appropriate way to manage that Commissioner's assigned cases and the agenda.

Conducting business between meetings

Commission business can be transacted between meetings in the following ways

- The Commission Chair and NAEYC staff meet virtually each month.
- Commission business can be conducted at any time via telephone or virtually if a quorum is confirmed.
- The online community platform is accessible only to Commissioners and NAEYC accreditation staff and is used throughout the year to conduct Commission business. This area includes a space for each committee that is always open and a planning space for each Commission meeting that opens at least one month before the meeting.

The Commission's private online community

The accreditation process is confidential, with the exception of the final accreditation decision. The Commission's work is confidential, with the exception of final decisions. This protects 1) the confidential and proprietary information that programs submit to the Commission, 2) the proprietary information that the Commission helps to develop for NAEYC, and 3) the private and confidential communication necessary between Commissioners as they deliberate and make decisions.

Given the confidential nature of the accreditation process, Commissioners need a communications outlet that allows them the freedom to express their perspectives and concerns about programs with each other without fear that these might be distributed or shared outside of the Commission. Thus, the primary communications outlet for the Commission is an online community platform.

The platform houses all Commission work – including spaces to review programs, Commission meeting materials, and Commission Committees. Commission and Committee work between meetings is conducted as much as possible in the private Commission online community rather than through personal email communication to ensure privacy for confidential communication, access for all Commissioners to the committee's work, and access for staff to share relevant documents and to record Commission process and procedure as needed.

If assistance is required, Commissioners are responsible for contacting staff for help learning to access, navigate and use the online community.

Quorum

A majority of the Commissioners entitled to vote shall constitute a quorum for the transaction of all business. Members may be present and participate either physically, via conference call, or through online meeting platforms. In the case of telephone and online meetings, voting will take place using an

electronic ballot or a voice vote. In the absence of a quorum, a majority of the Commissioners present may adjourn the meeting until a quorum shall be present. The Commission chair is not considered toward quorum of the Commission. The ex officio is not considered toward quorum of the Commission.

Voting

In the case of in-person meetings, voting may take place by voice vote. In the case of telephone and online meetings, voting may take place using an electronic ballot or a voice vote. All Commissioners must vote on each motion, register an abstention, or be excused from a vote due to a conflict of interest or an extenuating circumstance. The Commission Chair only votes when a tie results or the Commission does not reach a two thirds majority for an accreditation decision. In order for an accreditation decision to pass it must receive two thirds of the votes. For all other decisions, a simple majority of votes is needed. If the Commission does not reach a two thirds majority for an accreditation decision, the Commission can vote again on the same motion and include the Chair in the vote. If a two thirds majority is still not attained, then the Commission must make a different motion.

Use of the Consent Agenda for Accreditation Decisions

In order to add a program to the consent agenda, the panel assigned to review the program must reach consensus that the program meets accreditation standards with no conditions. At that point, the panel can recommend that the program be added to the consent agenda. If there is disagreement amongst the panel about whether the program fully meets the accreditation standards or if the panel's recommendation is that the program should be Accredited with Conditions, Accreditation Expired, Accredited with Probation or Not Accredited, the program is not eligible for the consent agenda. The Chair and NAEYC staff will review the proposed consent agenda cases to make the final determination of which programs will move to the consent agenda. At the Commission meeting, every Commissioner has the right to request that a program be removed from the consent agenda.

Managing Conflicts-of-Interest During Commission Meetings

[For a Commissioner Whose Program is on the Commission Agenda](#)

The Commissioner will recuse herself from the discussions and votes related to her program. During in-person meetings, the Commissioner will leave the room. During virtual meetings, the Commissioner will drop off the conference call or the online meeting platform until notified that the Commission has concluded deliberations on the program. In addition, the Commissioner will not have access to her program's space in the Commission's online community.

[For a Commissioner Who Resides in the Same State as a Program Under Consideration by the Commission](#)

A Commissioner who resides or works in the same state as a program under consideration by the Commission, or who has family members who work or study at the institution under review, may stay in

the room or remain in the virtual meeting during deliberations but will not participate in the discussion or vote.

For All Other Cases

For a Commissioner who:

- Served on the peer review team, for the most recent review cycle, for a program under consideration by the Commission
- Is a former employee, student, or consultant to the institution under review (within the past 10 years)
- Has a personal relationship with the primary contact at the program under review
- Has applied for a position at the program under review

Will recuse himself from the discussion and vote related to those programs. During in-person meetings, the Commissioner will leave the room. During virtual meetings, the Commissioner will drop off the conference call or the online meeting platform until notified that the Commission has concluded deliberations on the program. In addition, the Commissioner will not have access to her program's space in the Commission's online community.

Meeting minutes and decision memos

Meeting minutes will include the agenda items, topics discussed, and actions taken. They will not include comments by individual Commission members or staff. Any written reports submitted by Committee Chairs will be attached to the meeting minutes, along with the Decision Memo announcing new accreditation decisions. Minutes are available by written request, after approval by the Commission. The Decision Memo is posted on the public NAEYC website, after programs have been notified of decisions.

Making Accreditation Decisions

The primary responsibility of the Commission is to make accreditation decisions that are academically sound, reliable, transparent, and consistent with published policies and past precedent. The Commission is required to exercise a high degree of professional judgment as it applies the standards and criteria in its review of programs, including the Self-Study Reports, Peer Review Reports, and Written Responses. The accreditation decision is not based on a numerical score. Professional judgment must be used to evaluate the extent to which a program has met each accreditation standard.

Preparing for Accreditation Decisions Prior to Commission Meetings

Prior to each Commission meeting, the Commission Chair, working with NAEYC staff, appoints Commissioners to panels of at least two members and assigns a set of program reviews to each panel. The panel will produce a report which includes a recommended Accreditation Decision.

Each panel member is responsible for the preparation of a preliminary report to the Commission for each program assigned to the panel, participation in the deliberation after the preliminary report, and writing a draft of the final decision report after the meeting. The Commission Chair may assign leads with primary responsibility for report writing for individual programs. The panel's work includes:

- Reading the materials that provide evidence for an accreditation decision – e.g., the Self Study Report, Peer Review Team Report, Written Response, focused report and/or Annual Report(s) from the program
- Using the Commissioner's Discussion and Decision Guide to summarize the evidence presented
- Using current policy and related supporting forms such as the accreditation handbook, accreditation standards rubric, Commission program review guide, and decision tree to determine a recommended accreditation decision
- Preparing a written report that includes a summary of the evidence, any relevant contextual information about the program, and a recommended accreditation decision that is based on current policy and takes into consideration past precedent, as appropriate
- Posting written reports in the private online Commission community as requested by the Commission Chair
- Identifying exemplary assessments, report sections, approaches to report writing or other feedback and submitting those to the Training Committee Chair during the Commission meeting
- Completing a draft Decision Report after the meeting and posting it for full Commission review according to the timeline developed by the Commission Chair.

All Commissioners are expected to be familiar with each accreditation case and are encouraged to review and weigh in on the preliminary recommendations from panels via the online Commission community prior to the Commission meeting.

Commitment to Calibration

In an effort to strengthen consistency in decision-making, the Commission will regularly conduct calibration exercises. The calibration exercises will be determined by the Chair of the Commission, in consultation with the NAEYC staff.

Accreditation Decisions During the Commission Meeting

Accreditation decisions are made by the Commission as a whole. Typically, the lead Commissioner assigned to the program will present the recommended accreditation decision and the rationale prior to the discussion by the full Commission. In cases where the Commission is considering an adverse decision, the Chair may want to table the discussion so that the full Commission can review all documents related to the case if they have not had the opportunity to do so already.

Decisions Regarding 2nd Annual Report for Programs with Conditions

Programs accredited with conditions must demonstrate meeting the conditions by their second Annual Reports. For programs with conditions that submit their Annual Reports in the fall, their programs may be reviewed at the fall or spring Commission meeting. The Commission will assign a panel to review each program in preparation for the fall Commission meeting. If the panel unanimously agrees that the conditions have been met, the program will be added to the fall Commission meeting agenda. If the panel is not in agreement that conditions have been met, then the program will be added to the spring Commission meeting agenda so that there is sufficient opportunity to hold a full discussion of the program.

Rescinding Commission Decisions

If Commissioners or staff identify a procedural or substantive issue or other extenuating circumstances that may have negatively impacted an accreditation decision, the Commission may vote to rescind the accreditation decision. Commissioners or staff should notify the Chair of the Commission as soon as an issue is identified. If the Chair determines that the issue merits consideration, he/she will convene the Executive Committee, which will make a recommendation to the full Commission as to whether the decision should be rescinded. If the decision is rescinded during a Commission meeting, the Commission will reconsider the program during that same meeting. If the error or extenuating circumstances is discovered after the meeting, the Commission will convene virtually to consider rescinding the decision. If the decision is rescinded then the Commission will reconsider the program at its next in-person meeting. The Commission may request additional information from the program for clarification purposes.

Follow-Up After Commission Meetings

After the Commission meetings, as noted in the Commission panel section, each Commissioner is responsible for updating the Discussion and Decision guide for his/her assigned programs and posting the final guide in the Commission's online community. NAEYC staff will then create a Decision Report (for programs seeking initial or renewal accreditation) or Decision Letter (for programs whose conditions have been removed) to be sent to the program to convey the accreditation decision. Commissioners will review the Decision Reports and Letters prior to their being sent to the programs. In some cases, staff may create a feedback letter in lieu of a decision letter, when an accreditation decision was not made for a program under Commission review—for example, in response to a first Annual Report when conditions/probation were not removed, or if the Commission determined that insufficient evidence was available to make an accreditation decision.

If the Commission makes a “not accredited” or “probation” accreditation decision, those decisions will be reviewed by legal counsel to ensure that they were made in compliance with accreditation policies and procedures.

Records Retention

At Commission Meetings

Staff will provide a box to dispose of all confidential materials – including hard copies of accreditation materials for all programs on the meeting agenda – used during the Commission meetings. Commissioners are responsible for placing all reports and other confidential materials in the shred box. Staff are responsible for placing those items in the shred bin after each meeting. Commissioners may choose to bring reports/confidential materials home with them to complete their decision guides for their assigned programs. After the accreditation report and/or feedback letter have been finalized, Commissioners are responsible for shredding the reports/confidential materials. In addition, Commissioners should delete all emails related to the Commission meeting, including prompts from the Commission online community, discussions of accreditation cases, or emails related to other items on the Commission agenda.

Commission's Online Community

Discussions related to Commission decisions on programs, policies, or individual commission candidates are preserved only while active. Program spaces in the online community will be deleted after the decision report is issued to the institution. For programs that receive adverse decisions, the program space will be deleted after the period for filing an appeal passes or after the appeals process is complete. Discussions in the online community that are not related to accreditation decisions, will be deleted once the Commission takes an action related to the discussion. Commissioners are encouraged to use the online community rather than email to conduct Commission business and discussions

NAEYC Office

Staff will maintain a complete and accurate record for each accredited program and each program seeking accreditation. The program file should include, but not be limited to, the application for accreditation, the Self-Study Report, Peer Review Report, the program's Written Response, all official correspondence with the program, candidacy progress reports or accreditation annual reports, substantive change plans, records of appeal activities, and any accreditation decision reports and letters by the Commission. For programs that have renewed accreditation, only the materials related to the current accreditation cycle will be included. The NAEYC office will not retain files for programs that do not achieve accreditation. Files for programs for which accreditation status is terminated, either as a result of voluntary withdrawal or by final action of the Commission, will be retained for 5 years.

Staff will maintain files related to Commission meetings, including agenda materials, minutes of Commission meetings and conference calls.

Commission Travel and Expense Reimbursement

Travel reimbursements are processed by NAEYC. Commissioner travel to Commission meetings is arranged by office staff or reimbursed to the individual Commissioner, in accordance with current NAEYC and Commission Travel Policies. Travel reimbursement forms must be submitted to staff within two weeks following the Commission meeting. Original receipts/documentation must be attached to the form. Travel

reimbursements will be made payable to the individual Commission member. See Appendix C for the full Commissioner Travel Policy.

Chapter 6: Standards Development and Revision

Currently, the *2010 NAEYC Standards for Initial & Advanced Early Childhood Professional Preparation Programs for use by Associate, Baccalaureate, and Graduate Degree Programs* serve as the accreditation standards for NAEYC Accreditation of Early Childhood Higher Education Programs. The Commission on the Accreditation of Early Childhood Higher Education Programs approves the standards for the accreditation system.

The Commission and NAEYC staff share important roles in the development of national standards for early childhood professional development and preparation.

Standards revision process

The accreditation standards are currently published as the *2010 NAEYC Standards for Initial and Advanced Early Childhood Professional Preparation Programs For use by Associate, Baccalaureate and Graduate Degree Programs*. This document guides programs as they conduct self-study work and prepare program reports, guides reviewers as they evaluate the evidence in program reports and site visits, and guides Commissioners as they evaluate the evidence submitted for an accreditation decision. The accreditation standards publication includes a glossary of terms used in the NAEYC accreditation and recognition systems and a rubric for use in peer reviewer evaluations and Commission decisions.

NAEYC higher education accreditation staff, on behalf of the Commission, lead the work for the standards development and revision process and are responsible for ensuring that the process for development of these standards is in compliance with NAEYC Governing board policy, the Higher Education Act (HEA), the Association for Specialized and Professional Accreditors (ASPA) Code of Good Practice, and Council for Higher Education (CHEA) Recognition Policy and Procedure. The Commission adopts the standards that serve as the framework for the accreditation system.

This standards revision process may take 12-24 months and includes

- A review of current requirements for higher education accreditation standards as published by the Higher Education Act, the U.S. Department of Education, the Association of Specialized and Professional Accreditors (ASPA), the Council on Higher Education Accreditation (CHEA), and the Council for Accreditation of Educator Preparation (CAEP).
- The appointment of a working group by the Commission, comprised of stakeholders in the accreditation system, to draft the revised standards.
- Multiple opportunities for the public to weigh in on the current standards and drafts of revised standards.
- After analysis and consideration of all written responses, a final draft is presented for adoption by the NAEYC Commission on the Accreditation of Early Childhood Higher Education Programs.

Appendix A: Commission Culture Commitments

The Commission and Accreditation Handbooks provide significant guidance on the accreditation process as well as the policies and practices that undergird the system and the Commission's work. In addition, we recognize that as an organization we have a distinct culture that is sometimes visible and sometimes invisible. In the spirit of transparency, following is an attempt to make visible key cultural values and practices of the Commission.

- We value maintaining unity and trust in our work. This means:
 - We respect that each of us brings significant professional experiences that can inform and advance our shared understanding of the accreditation standards, early childhood programs, and the accreditation system.
 - We welcome and actively solicit each member's perspectives
 - We fulfill our responsibilities and meet deadlines related to our work.
 - If we are unable to meet a deadline, we are up front with our colleagues and work to fulfill our assignments as soon as possible after the deadline
 - We appreciate differing perspectives on issues and cases that come before the Commission and recognize that there may be times when we disagree on a decision
 - To the extent possible, though, we work toward reaching consensus in making accreditation decisions

- We expect that each of us will come prepared to the Commission meeting. This means:
 - We have submitted our draft recommendations for accreditation cases in Basecamp by the deadline set by the Chair
 - We have reviewed and provided feedback on our panel's cases in Basecamp by the deadline set by the Chair
 - For our panel's assigned cases, we have identified the questions, concerns or other issues that we need to address when our panel meets in-person at the Commission meeting.
 - For virtual meetings, prior to the Commission meeting, our panel has resolved any questions, concerns or issues with our assigned cases or identified issues that need the full Commission's consideration
 - We are familiar with all of the cases on the Commission agenda
 - We have read the Decision Guides for each case
 - For cases where there are significant questions/concerns, as indicated in their Basecamp spaces, we have reviewed their Self-Study Reports, Peer Review Reports and Written Responses as needed.
 - We bring a laptop to the meeting or printed copies of all materials related to accreditation cases so that we have access to all documents that can inform accreditation decisions.

- We foster a collegial atmosphere to facilitate our work. This means:
 - We build relationships with each other and value opportunities to socialize outside of the meeting
 - The Commission Dinner at the in-person meeting is an important opportunity to build our relationships. We make all attempts to attend the dinner.
 - We recognize that being present at meetings is critical to our work and to building relationships with each other.
 - We commit to attend all of every Commission meeting, both online and in person.

- We identify when virtual participation at an in-person meeting can be conducive to or challenging to conducting Commission business
- We participate fully while we are at the meetings.
 - We manage our email and phone calls during the breaks in the meeting
 - We focus on the case that is under discussion
- The Commission and staff work in partnership to support each other

Appendix B: ASPA Code of Good Practice

An accrediting organization holding full membership in the Association of Specialized and Professional Accreditors:

Promotes quality in education through accreditation processes that:

- Focus on student achievement of knowledge and competence as defined by institutional and programmatic missions, goals, objectives, and contexts.
- Affirm that teaching and learning are the primary purposes of institutions and programs.
- Evaluate educational quality in a manner unbiased by special interests, politics or educational delivery models.
- Encourage institutions and programs to provide clear and accessible public information about student achievement that is pertinent to their communities of interest.

Conducts accreditation processes with integrity and professionalism that:

- Maintain autonomy and integrity in governance and operations through appropriate relationships, practices and avoidance of conflict of interest.
- Create, document and implement policies, and procedures to ensure fair and consistent application standards and objective decision making that includes attention to due process, confidentiality, and expedient response to appeals and complaints.
- Develop, review and revise standards and accreditation procedures with the participation of communities of interest.
- Maintain sufficient financial, personnel, and other resources for effective operations, while ensuring efficient and cost-effective accreditation processes for institutions and programs.
- Cooperate with other accrediting organizations wherever possible to avoid conflicting standards and to minimize duplication of effort by the institutions and programs.
- Provide thoughtful analyses to assist institutions and programs in developing their own approaches and solutions, making a clear distinction between accreditation requirements and recommendations for improvement.
- Provide accurate, clear, and timely information to communities of interest about accreditation standards and procedures and the accreditation status of institutions and programs.
- Maintain a thorough and effective orientation, training, and professional development program for all accreditation personnel.
- Ensure that site teams have the appropriate expertise and experience for each specific review.
- Include periodic self-evaluations of the accreditation process that incorporate input from accredited institutions and programs.

Respects institutional independence and freedom in academic decision making through accrediting activities that:

- Encourage institutional independence and freedom to make academic decisions within the commitment to mutual accountability implicit in participation in accreditation.
- Promote the rights of institutions and programs to determine: missions and goals; educational and assessment methodologies; scholarship, research, and policy agendas; curricular content; and administrative and staffing configurations.

- Encourage experimentation, innovation, and thoughtful change that meet the needs of the profession and the communities served.

*[Code of Good Practice April 2017](#)

*Original adopted by membership March 21, 1995

Appendix C: Commission Background Check Policy

Background Screening of Potential Commission Members

Individuals identified as potential candidates for positions will be required to submit to a criminal background check and sexual offender registry check. Membership is contingent upon the completion and results of these background checks.

The Association's reporting agency will take all reasonable steps to ensure that the information is accurate and up to date. Candidates will be provided adequate notice and reasonable time to confirm or deny the accuracy of the information before taking adverse action. The Commission will not presume that candidates are guilty of any pending arrests or charges.

Information obtained from the background and reference checks will be considered for Commission Member candidacy purposes. The Association will treat as confidential all information collected in connection with background and reference checks, to the extent permitted by law, and all such information will be shared on a "need-to-know" basis only.

Exceptions to this policy will be permitted only if there is a clear and convincing reason for such exception. Any exception must be approved by the Commission and the reasons for the exception documented in writing.

All potential candidates will be required to sign appropriate authorizations and consents prior to the performing of any background checks. All potential candidates will be individually assessed, and decisions will be made with respect to Commission membership based upon the totality of the candidate's qualifications and the results of the background checks.

One or more of the following are absolute barriers to Commission membership. However, non-conviction dispositions (examples include disposition by stet and probation before judgement) are not included in the following barriers:

- (a) On any sexual offender registry— national, state, or local jurisdiction
- (b) Any felony conviction within the past 7 years
- (c) Any conviction of a crime of moral turpitude within the past 7 years
 - i Examples: fraud, embezzlement, bribery, perjury, forgery, arson, murder
- (d) Any conviction of a crime involving children within the past 7 years (child is defined as any individual who requires the guardianship of an adult)
 - i Examples: child pornography, child trafficking, sexting, abuse & neglect of children or incapacitated adults, failing to secure medical attention to injured child, allowing children access to firearms

The Nominating Committee is not limited by the above list and reserves the right to disqualify a candidate where, in the sole opinion of the Nominating Committee, it is in the best interests of the Commission.

If one or more of these barriers appear on a potential Commission member candidate's background check report, and after the time period elapses for the candidate to confirm or deny the accuracy of the information in the background report, the Commission will remove that candidate from consideration for appointment to the Commission.

Prior to taking any adverse action, appropriate pre-adverse and adverse action notices will be sent to the potential candidate pursuant to federal and any state FCRA laws together with a copy of the report. A disqualified candidate will receive written notification of their disqualification, as well as the method for appealing the decision within ten days of the disqualifying report. The disqualified candidate may request an appeal within ten days of receipt of the disqualification notice and members from the Commission will hear the appeal at the soonest available time but no later than 10 days from the time the appeal is requested. The disqualified candidate may present information or documentation to the Commission to dispute the findings of the background checks. The Commission members hearing the appeal will issue a decision within 5 days of the appeal hearing. This decision is a final and binding decision.

Appendix D: Commissioner Travel Policy

NAEYC is a tax-exempt public charity under Section 501(c)(3) of the Internal Revenue Code. Because of this special tax-exempt status, NAEYC must ensure that its funds are used to further its charitable purposes and that all expenses are reasonable both in nature and amount.

It is NAEYC's policy to reimburse individuals for all necessary and appropriate transportation and travel-related costs incurred by individuals in connection with approved NAEYC activities. While traveling on NAEYC business, individuals should expect to receive service and accommodations that are safe, comfortable, and conducive to their work, but not lavish or extravagant. Individuals should not gain or lose personal funds as a result of official travel. In addition, whenever possible, **travel arrangements should be made at least 21 days in advance to minimize travel rates.**

NAEYC will not pay for or reimburse business or travel expenses that have been or will be reimbursed from any outside source, unless NAEYC invoices the outside source for direct reimbursement.

General Expense Reimbursement Policies

Expenses are to be submitted within 30 calendar days of completing the travel or incurring the expense.

Generally, expenses submitted for reimbursement longer than 60 calendar days after completing the travel or incurring the expense will not be accepted. Exceptions are considered on a case-by-case basis and require justification and approval from the signatory/signatories appropriate for the individual.

All individuals requesting reimbursement or incurring business and travel expenses are required to attach receipts (or a scan thereof) to substantiate their business expenses. As with any NAEYC payment, supporting documentation is necessary to verify expenditures and eliminate the possibility of duplicate payments. All single expenditures of \$50 or greater need to be accompanied by receipts. If, in rare cases, receipts are not available, an individual must note on the expense reimbursement form what the item purchased was.

It is not appropriate to round off amounts or to estimate expenses. In cases where receipts are not required to be submitted (e.g., highway tolls, tips, or an expense in an amount less than \$50), individuals must still report the actual amounts of the charges and itemize these expenses.

Detailed receipts that support credit card charges are considered to be original receipts and must be submitted. Copies of credit card charge slips (without the detail) or credit card statements are not sufficient documentation. Tear-off stubs for meals should be accompanied by a cash register receipt. If no other form of receipt can be obtained, the credit card statement or charge slip will be accepted. In the case of airfare not charged directly to a departmental account through an NAEYC travel management company, individuals must provide proof of payment. Travel itineraries do not constitute receipts for reimbursement purposes.

Meal and restaurant receipts must be itemized and include the name and location of the restaurant, the number of people served, and the date and amount of the expense.

Transportation Policies

Air Transportation

Specific elements to consider when making travel arrangements that involve airfare:

- **Ticket Prices**—US airfare over \$500 requires preapproval from NAEYC. International airfare over

\$1200 requires preapproval from NAEYC.

- **Class**—The class of air travel chosen is expected to be the lowest-priced (i.e., coach/economy airfare) ticket available.

In rare cases, premium (e.g., business class) fares may be an appropriate business expense. Situations in which premium fares may be appropriate are

- Flights exceeding eight continuous hours.
- Flight by an individual with a medical condition. Proper documentation must be secured from Human Resources.
- **Discounted Airfares**—The following types of low-fare alternatives should be considered in determining the lowest logical airfare for travel:
 - Specially negotiated fares
 - Advance purchase fares
 - Connecting and one-stop flights
 - Off-peak flights
 - Alternate airports
 - Lower-cost non-preferred carriers
- **Frequent Flyer Plans**—Individuals may personally retain frequent flyer plan rewards or other bonuses that may accrue from business travel. However, in no case may the individual choose a reservation at a higher cost in order to accumulate additional plan rewards. NAEYC will not purchase frequent flyer miles from individuals or reimburse them for tickets purchased with frequent flyer miles.
- **Baggage**—Charges by airlines for checked baggage when traveling on NAEYC business are a reimbursable business expense. NAEYC authorizes one checked bag per trip. Excess baggage expenses are reimbursable in either of the following circumstances:
 - Individual is transporting NAEYC materials
 - Individual is traveling for more than 14 days
- **Parking**—Airport or other business parking will be reimbursed, but individuals should use long-term, lower-cost parking lots when available, unless there is a credible reason for not doing so. If public transportation or a cab/car service taken to and from the airport or other business location would result in a lower cost or a safer mode of transportation, the individual is encouraged to take advantage of these savings/safety measures.
- **Early Departure or Late Return**—Additional costs incurred when individual departs earlier than required for business or returns after required for business are not reimbursable unless the savings in airfare is equal to or greater than the total costs for lodging, meals, and so on, incurred during the additional days of travel.
- **Cancellations**—When a trip is canceled by NAEYC after the ticket has been issued, the individual should inquire about using the same ticket for future travel. If a refund is possible, then the individual should request a refund. When a flight is canceled by the airline, the individual should inquire about using the same ticket for future travel. If a refund is possible, then the individual should request a refund. The individual should ask to be placed on the next available flight.

If a ticket must be canceled or changed as a result of individual error or personal circumstances that prohibit the individual's ability to fulfill the set travel arrangements, individuals will be responsible for all related fees, to include but not limited to overnight stays, airline change fees, and/or additional airline tickets.
- **Lost Baggage/Items**—NAEYC does not maintain any lost baggage/items insurance coverage for any loss of personal belongings of its volunteers while on NAEYC business travel. NAEYC volunteers are encouraged to make their own arrangement for this type of insurance coverage either through their

personal homeowners/renters insurance company or with their travel agent at the time of travel. Generally, NAEYC will not reimburse for this type of insurance.

Automobile Travel

- **Personal Automobiles**— When the use of a personal automobile is necessary for NAEYC business, reimbursement for its use will be made at the mileage rate published by the IRS. Rental cars should be used in lieu of personal automobiles when the mileage exceeds 100 miles in one direction. If individuals use their own vehicle, it is their responsibility to carry adequate personal insurance coverage for themselves, the vehicle, any passengers, and any other costs associated with an accident.
 - For Peer Reviewers - Rental cars may be used in lieu of personal automobiles when (1) it is not practical to use a personal vehicle when traveling between home and a site visit, and/or (2) a rental car is needed for the team’s local transportation after arrival by air/rail. In the case of (1), the cost of reimbursement for mileage on a personal vehicle or for a rental car should not exceed the cost of traveling from home via air/rail, though exceptions may be made in situations for when both (1) and (2) apply. In the case of (2), the cost of a full-size rental car should not exceed the cost of transportation via local shuttles/taxis and parking, unless the team is in a geographic area where work-conducive shuttles/taxis are not readily available.

The mileage reimbursement rate includes reimbursement for use of the vehicle as well as any repairs, gas charges, and the owner’s personal automobile insurance coverage, which provides the coverage in case of an accident. Tolls and parking fees are separately reimbursable.

NAEYC will not reimburse individuals for parking tickets, fines for moving violations, vehicle towing charges, or auto repairs and maintenance. Use MapQuest, Google Maps, or a similar website to confirm mileage, and attach the printout to the expense report. Additionally, if more than one authorized individual is transported in a personal vehicle, mileage is payable to only one person. The owner of the personal vehicle will not be reimbursed additional amounts for transporting multiple authorized individuals.

- **Rental Cars**—In all circumstances, the use of a rental car should be thoughtfully considered and the relevant costs and convenience associated with the use of available ground transportation, such as taxis and hotel and airport shuttles, should be weighed against the cost and need for a rental car. Rental of vehicles for NAEYC business use should be arranged through NAEYC’s preferred suppliers unless the rate is lower from a non-preferred provider. NAEYC has arranged corporate benefits with AVIS and Hertz, and it is recommended that individuals select these rental car companies when booking online unless other company rates are more cost-effective.

All drivers of rental vehicles must be over the age of 21 and have a valid driver’s license. In order to benefit from the AMEX rental car insurance, drivers must be 25 or older. Individuals who did not use NAEYC’s AMEX travel portal to rent the car should accept the collision/damage coverage offered by the rental car company. Individuals who rented a car through NAEYC’s AMEX travel portal should decline the collision/damage coverage as AMEX provides collision/damage coverage.

AVIS: NAEYC Corporate Account Number Q155004 (use whenever asked for AWD# and/or World Wide Discount number).

Hertz: NAEYC Discount (CDP) #1603084. Please set up your personal account Hertz #1 Gold Account at <http://bapmember.hertz.com>. Click on *Enrolled Accounts (US)*. Click on *Fee-Waived Hertz #1 Club Gold Application*, Company Name: NAEYC, (CDP) # 1603084, PIN Code: bapgold. Agree to the terms and fill out the application, including your driver’s license number. This will give you your Hertz #1

Club Gold account number, which you can use to make and/or modify reservations online. Compact vehicles are the recommended vehicle size for rental purposes. Upgrades to standard cars are permissible if NAEYC provides prior approval. A detailed explanation (e.g., number of persons, luggage accommodations) is included in the business justification.

- For Peer Reviewers – Full-size vehicles are the recommended vehicle for rental purposes when three individuals will be riding together with their luggage from/to an airport. Standard-size cars are encouraged if one reviewer (with luggage) will be traveling from home and then additional passengers (without luggage) will ride in the vehicle on site.

In addition to the payment for the cost of the rental car, the only other permissible operating expense for rental cars in most cases is the cost to purchase gasoline.

- Coverage under NAEYC's automobile insurance policy is only provided for vehicles rented in the United States, the District of Columbia, the territories and possessions of the United States, and Canada
- Rented vehicles should be leased as: NAEYC—(name of individual)
- **Accidents** - Should an accident occur, the individual should immediately contact the following individuals or authorities:
 - Personal insurance agent or company (because NAEYC does not have primary insurance coverage on liability claims)
 - Rental car company (if applicable)
 - Local authorities, as required
 - NAEYC

Ground Transportation—Ground transportation is an appropriate business expense (including a tip) to the extent that such service is necessary for business purposes. Public transportation, cab, or car services are acceptable modes of transportation. The individual must weigh the benefits of costs, availability, time savings, and safety when choosing the mode for business travel. For example, for trips greater than 20 and less than 200 miles, a personal vehicle or public transportation is likely more economical than a car service.

Rail Travel

Generally, seating (or the class) on rail transportation is expected to be lowest-priced ticket for the type of train taken.

- **Standard Train**—The class of rail travel chosen on a standard train is expected to be a coach-class rail ticket. In some cases, premium (e.g., business class) fares may be an appropriate business expense, subject to budget availability and prior approval by the signatory/signatories appropriate for the individual.
- **Extra-Fare Trains**—Whenever practical, individuals should determine the appropriateness of booking rail travel on an extra-fare train (Acela or other trains that are described as faster speed or fewer stops). If there are scheduling constraints, a demonstrated need, or the individual's mission requires travel on Acela, then seating should be at the basic accommodation on that train, which is business class.

Include in your travel expense report an explanation as to why the extra-fare train was chosen.

Lodging Policies

NAEYC will directly pay or reimburse an individual for lodging expenses for the single-occupancy cost of a standard room in a moderate, economy, or budget class of hotel, incurred during NAEYC-related travel. Moderate, economy, or budget-class hotels typically have a three star rating or below on travel

sites.

NAEYC will not pay for free accommodations awarded in connection with hotel frequent guest programs or any complimentary room accommodations provided by a hotel or other third party.

Tips for hotel staff are reimbursable when confined to reasonable limits, as determined by the services required and received.

Cancellations

Individuals will be held responsible and will not be reimbursed for “no-show” charges, unless due to unavoidable business circumstances.

Individuals should only select prepaid nonrefundable hotels if travel dates and locations are a certainty.

Individuals should request and record the cancellation number in case of billing disputes.

Individuals should note that cancellation deadlines are based on the local time of the property.

Meal Reimbursements

NAEYC will reimburse individuals for the reasonable cost of their own meals incurred during the time they are away from home up to \$65. If an individual consumes alcohol with a dinner meal, NAEYC will reimburse the individual for one alcoholic beverage. Alcoholic beverages are not reimbursable prior to 5:00 p.m. in the time zone of purchase.

As a general rule, individuals are expected to incur no additional cost for meals that are provided as part of attendance at conferences, workshops, meetings, hotel costs, etc. When meals are provided in this way, the reimbursement rate will be reduced accordingly. If there is a business justification provided regarding dietary restrictions, the individual may be reimbursed for the meal.

The individual is responsible for noting on the business expense report meals that were included as part of the conference registration fee, hotel costs, etc.