

Peer Reviewers Serving as Independent Consultants

Institutions accredited by or seeking accreditation with HLC occasionally ask HLC peer reviewers to serve as independent consultants or on mock teams. This statement provides guidance to institutions and peer reviewers who engage in such arrangements.

HLC Policy and Restrictions

Peer reviewers may accept independent consulting assignments to accredited institutions or those seeking accreditation unless prohibited by HLC's policy on [Peer Reviewer Standards of Conduct](#). The relevant section of the policy is provided below.

Standards of Conduct Policy number: PEER.A.10.040 **Independent Consulting**

To avoid the appearance of possible conflict of interest in the accreditation process, no peer reviewer who evaluated an institution for HLC may serve as an independent consultant to that institution for a period of three years following the official HLC accrediting action. In addition, no peer reviewer will participate in an HLC evaluation of an institution for which that peer reviewer served as an independent consultant in the previous ten years. (See [HLC Policy PEER.A.10.050: Peer Corps Members in HLC Evaluative Activities](#).)

Peer reviewers will disclose to HLC on an annual basis all consulting activities related to a member institution or related to accreditation and will agree to inform any institution or other entity with which the peer reviewer is developing a consulting relationship

that the peer reviewer is acting in a personal capacity and is not representing HLC.

Therefore, it is essential that peer reviewers keep HLC informed of any consulting activity to its accredited institutions or those seeking accreditation.

Peer reviewer roles include, but are not limited to, service as team members, Change Panel members, Eligibility Panel members and Institutional Actions Council members.

Institutions Seeking Consultants

Identifying Peer Reviewers to Serve as Consultants

The [roster of HLC peer reviewers](#) is available on HLC's website.

HLC is not recommending these peer reviewers as independent consultants, nor is HLC sponsoring or directing any consulting assignment that may result from an institution or organization identifying a peer reviewer from HLC's website. The list is available to make the public aware of who serves on HLC teams, rather than to provide a list of available or qualified consultants.

In the past, HLC staff may have provided the names of peer reviewers to institutions seeking an independent consultant. However, because this practice has contributed to confusion over the role of the peer reviewer in such consultancies, HLC no longer provides this information.

Mock Team Visits

Independent consulting activities not sponsored or directed by HLC include the mock team visits that some institutions arrange prior to HLC evaluation visits. Some institutions have reported finding mock visits to be useful if the purposes are to help improve the quality of the institution's written materials and to acquaint the institution with the process of a team review. In this capacity, such service can be conducted by a variety of parties, including colleagues from other institutions who have recently completed an HLC evaluation. Experienced peer reviewers on the institution's own campus can also provide useful guidance.

Guidelines For Peer Reviewers

Serving as an Independent Consultant

- An HLC peer reviewer who accepts an independent consulting assignment is not representing or otherwise speaking for HLC in this activity. The peer reviewer is acting solely in his or her own personal capacity during the assignment within the scope of an agreement between the peer reviewer and the institution or other organization to which HLC is not a party.
- It is the peer reviewer's responsibility to make sure that the institution or other entity requesting the consulting understands that the peer reviewer does not represent HLC in the consulting activity. All contracts or other written agreements between the peer reviewer and the institution reflect this understanding.
- In considering an assignment, the peer reviewer should be aware of any special conditions, such as a sanction, affecting the institution's accreditation relationship that he or she may not have encountered in previous service to HLC.
- The peer reviewer acting as an independent consultant should not identify himself or herself as an HLC peer reviewer while on the campus or in any other aspect of the consultancy. The peer

reviewer should not wear the HLC peer reviewer name badge. The peer reviewer should not include this role for HLC on business cards or similar forms of identification.

- Any advice or recommendations coming from this consultancy are not binding on HLC or the institution and have no bearing on HLC processes or decisions.
- The peer reviewer acting as an independent consultant should refrain from providing recommendations that mimic, or take the form of, HLC team recommendations.
- HLC indemnification or insurance policies do not apply to independent consulting activities conducted by peer reviewers. The peer reviewer is solely responsible for the advice provided and may want to seek professional advice about the risk of personal liability in such activities and the need for appropriate insurance.
- It is the peer reviewer's responsibility to notify HLC of such consulting activity so that future conflicts of interest can be avoided.

Serving on a Mock Team

In addition to the guidelines for serving as an independent consultant, the following guidelines apply specifically to peer reviewers who accept assignments for mock team visits:

- Mock visits are not useful to the institution or HLC when the institution and the mock team do not clearly understand that the mock team members are acting in their own personal capacity when they conduct the visit.
- Mock visits also create problems for the institution and HLC when they appear to substitute the judgment of the mock visit team for the actual team or set an expectation for or anticipate the outcome of the actual team visit.
- HLC peer reviewers who serve on mock teams should not make specific findings or recommendations or in other ways reproduce the concluding portion of the team visit. Such actions may raise inappropriate expectations and may be construed as formal accreditation advice. They can also seriously interfere with the ability of HLC's teams and decision makers to carry out their responsibilities.

Questions?

Peer reviewers should contact Allison Langford, Director of Peer Corps Relations and Services, at alangford@hlcommission.org.