

# MPSEOC Code of Ethics

Draft for Board Review

Montana Post-Secondary Educational Opportunities Council (MPSEOC)  
Code of Ethics

This Code of Ethics applies to all MPSEOC board members, staff, contractors, and volunteers. It is intended to guide conduct, support sound decision-making, and protect the trust placed in MPSEOC by students, families, counselors, schools, member institutions, partners, and the public.

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## I. Personal and Professional Integrity

- A. All representatives of MPSEOC act with honesty, integrity, and openness in all their dealings on behalf of MPSEOC.
  - B. MPSEOC promotes a working and volunteer environment that values respect, fairness, inclusion, and integrity.
  - C. MPSEOC does not tolerate discrimination, harassment, bullying, or retaliation of any kind. All individuals will be treated with dignity and professionalism and in accordance with MPSEOC's Internal Office Policy and other applicable policies.
  - D. MPSEOC representatives avoid conflicts of interest, or the appearance of such conflicts, and comply with MPSEOC's Conflict of Interest Policy and related Board and organizational policies.
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## II. Mission

- A. The Montana Post-Secondary Educational Opportunities Council (MPSEOC) is a non-profit organization representing the 25 institutions of higher education across the state of Montana. The mission of the organization is the promotion of higher education to students, families, counselors, and schools with the awareness of the post-secondary opportunities available throughout the state of Montana and beyond.
- B. All MPSEOC programs, services, and activities support this mission. All who work for or on behalf of MPSEOC are expected to understand, support, and be loyal to that mission and purpose.
- C. MPSEOC's mission is responsive to the constituencies and communities it serves and is intended to benefit students, families, schools, institutions of higher education, and society at large.

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### III. Governance

A. MPSEOC's Board of Directors is responsible for setting the mission and strategic direction of MPSEOC and for overseeing its finances, operations, and policies.

B. The Board and individual directors and officers act in accordance with the Board Governance Policy, Conflict of Interest Policy, this Code of Ethics, and any other policies adopted by the Board related to the appropriate conduct of directors and officers.

C. Among its duties, the Board of Directors:

1. Ensures that its members collectively have the skills, experience, and perspectives necessary to carry out their duties and that all members understand and fulfill their governance responsibilities in support of MPSEOC's public purpose;
2. Maintains and enforces a conflict of interest policy that ensures that any conflicts of interest, or the appearance thereof, are avoided or appropriately managed through disclosure, recusal, or other means;
3. Is responsible for the hiring, support, regular evaluation, and, if necessary, termination of the executive director, and ensures that the executive director's compensation is reasonable and appropriate in accordance with the Executive Compensation Policy;
4. Ensures that the executive director and appropriate staff provide the Board with timely, accurate, and sufficiently comprehensive information so that the Board can effectively carry out its duties;
5. Ensures that MPSEOC conducts all transactions and dealings with integrity and honesty;
6. Promotes working relationships among board members, staff, volunteers, member institutions, and program beneficiaries that are based on mutual respect, fairness, inclusion, and openness;
7. Ensures that MPSEOC is fair and inclusive in its recruitment, hiring, and promotion practices for all board, staff, and volunteer positions;
8. Ensures that MPSEOC's key policies are in writing, clearly articulated, regularly reviewed, and officially adopted;
9. Ensures that the financial and other resources of MPSEOC are responsibly and prudently managed; and
10. Ensures that MPSEOC maintains the organizational capacity to carry out its programs effectively, including periodic assessment of Board and organizational performance.

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### IV. Legal Compliance

A. MPSEOC complies with all applicable federal, state, and local laws, regulations, and professional standards relevant to its operations, including but not limited to those related to nonprofit governance, education, employment, privacy, and fundraising.

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## V. Responsible Stewardship

A. MPSEOC manages its funds and other resources responsibly and prudently. This includes the following considerations:

1. MPSEOC spends a reasonable percentage of its annual budget on programs that advance its mission;
  2. MPSEOC invests adequately in administrative expenses to ensure effective accounting systems, internal controls, competent staff, appropriate technology, and other expenditures critical to professional management;
  3. MPSEOC compensates staff, and any others who may receive compensation, reasonably and appropriately;
  4. To the extent MPSEOC has endowments or restricted grants, it prudently manages and draws from such funds consistent with donor/grantor intent, legal guidelines, and its public purpose;
  5. MPSEOC ensures that all spending practices and policies are fair, reasonable, transparent, and appropriate to fulfill its mission; and
  6. All financial reports are factually accurate and complete in all material respects.
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## VI. Transparency, Public Reporting, and Privacy

A. MPSEOC provides appropriate and timely information to the public, its members, and other stakeholders and is responsive to reasonable requests for information, consistent with legal and privacy requirements and MPSEOC's Public Reporting and Transparency Policy.

B. All information about MPSEOC will fully and honestly reflect its policies, practices, and performance.

C. Basic organizational and financial information, such as MPSEOC's annual Form 990 and any audited financial statements, will be posted on MPSEOC's website or otherwise made available to the public in accordance with the Public Reporting and Transparency Policy and the Document Retention Policy.

D. All solicitation materials and public communications—including print, digital, email, and social media—accurately represent MPSEOC's mission, policies, and practices and reflect the dignity of program beneficiaries and stakeholders, in alignment with MPSEOC's Social Media Policy.

E. All financial, organizational, and program reports will be complete and accurate in all material respects.

F. MPSEOC respects the confidentiality and privacy of personal and sensitive information it collects or maintains about students, families, donors, member institutions, staff, and others, and uses such information only for legitimate organizational purposes and in compliance with applicable law and MPSEOC's internal policies.

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## VII. Program Quality and Evaluation

A. MPSEOC regularly reviews the effectiveness and quality of its programs and services and has mechanisms to incorporate lessons learned into future work.

B. MPSEOC is committed to continuous improvement in both program and organizational effectiveness and develops mechanisms to promote learning from its activities and from the broader field of post-secondary education access and outreach.

C. MPSEOC is responsive to changes in its environment and to the needs of its constituencies, including students, families, counselors, schools, and member institutions.

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## VIII. Inclusiveness, Diversity, and Non-Discrimination

A. MPSEOC promotes inclusiveness and diversity in all aspects of its work. MPSEOC takes meaningful steps to promote inclusiveness in its recruitment, hiring, retention, promotion, board recruitment, volunteers, and constituencies served.

B. MPSEOC does not discriminate on the basis of race, color, national origin, ethnicity, religion, sex, gender identity or expression, sexual orientation, age, disability, veteran status, or any other status protected by applicable law in any of its policies, programs, or activities.

C. MPSEOC strives to ensure that its programs and events are as accessible as reasonably possible to all participants.

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## IX. Fundraising and Resource Development

A. To the extent that MPSEOC raises funds from the public or from donor institutions—through in-person, mail, online, or other channels—MPSEOC is truthful in its solicitation materials and will disclose important and relevant information to potential donors.

B. MPSEOC respects the privacy and preferences of individual donors and expends funds consistent with donor intent, applicable law, and MPSEOC policy.

C. MPSEOC respects the rights of donors, including the right:

1. To be informed of the mission of MPSEOC, the ways resources will be used, and MPSEOC's capacity to use donations effectively for the intended purposes;
2. To be informed of the identity of those serving on MPSEOC's Board and to expect the Board to exercise prudent judgment in its stewardship responsibilities;
3. To have access to MPSEOC's most recent Board-approved program and financial reports;
4. To be assured that their gifts will be used for the purposes for which they were given;
5. To receive appropriate acknowledgement and recognition, subject to their preferences and applicable law;
6. To be assured that information about their donations is handled with respect and with confidentiality to the extent provided by law;
7. To expect that all relationships with individuals representing MPSEOC will be professional in nature;
8. To be informed whether those seeking donations are volunteers, employees of MPSEOC, or hired solicitors;
9. To have the opportunity for their names to be removed from mailing, email, or similar contact lists; and
10. To feel free to ask questions when making a donation and to receive prompt, truthful, and forthright answers.

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## X. Reporting Concerns and Non-Retaliation

A. MPSEOC encourages board members, staff, volunteers, and others to raise good-faith concerns about suspected violations of this Code of Ethics, MPSEOC policies, or applicable law, including through the mechanisms described in MPSEOC's Whistleblower Policy.

B. MPSEOC will address such concerns promptly and, when appropriate, confidentially, consistent with its Whistleblower Policy and other applicable procedures.

C. MPSEOC prohibits retaliation against any individual who, in good faith, reports a concern or participates in an investigation.

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