



INDIANA COMMISSION *for*
HIGHER EDUCATION

July 7, 2025

FILED

Indiana State Ethics Commission
c/o Office of Inspector General
315 W. Ohio Street, Room 104
Indianapolis, IN 46202

JUL 10 2025

INDIANA STATE
ETHICS COMMISSION

Re: Designation Letter

Dear Commissioners:

I serve as the Commissioner for Higher Education and the appointing authority for the staff of the Indiana Commission for Higher Education, including my Assistant Commissioner for Public Policy and Strategic Partnerships, Mr. Greg Harrell. I have submitted a post-employment waiver for Mr. Harrell for your consideration.

Since I will be unable to attend the State Ethics Commission's meeting on Thursday, July 10, 2025, I hereby designate Ms. Michelle Ashcraft, Senior Associate Commissioner and Chief Operating Officer at the Indiana Commission for Higher Education, to present the above-referenced waiver on my behalf. Please feel free to direct any questions concerning the filing to Ms. Ashcraft.

Thank you for your consideration of this waiver request.

Sincerely,

Chris Lowery,
Commissioner for Higher Education

IC 4-2-6-11

Post-employment waiver

As the Appointing Authority of the Indiana Commission for Higher Education, I am filing this waiver of the application of the Code of Ethics' post-employment restriction as it applies to Greg Harrell in his post-employment with the Institute for Quality Education.

I understand that I must file and present this waiver to the State Ethics Commission at their next available meeting. I further understand that this waiver is not final until approved by the State Ethics Commission.

- A. This waiver is provided pursuant to IC 4-2-6-11(g) and specifically waives the application of *(Please indicate the specific restriction in 42 IAC 1-5-14 (IC 4-2-6-11) you are waiving):*

- ☒ IC 4-2-6-11(b)(1): 365 day required "cooling off" period before serving as a lobbyist.
- ☐ IC 4-2-6-11(b)(2): 365 day required "cooling off" period before receiving compensation from an employer for whom the state employee or special state appointee was engaged in the negotiation or administration of a contract and was in a position to make a discretionary decision affecting the outcome of such negotiation or administration.
- ☐ IC 4-2-6-11(b)(3): 365 day required "cooling off" period before receiving compensation from an employer for which the former state employee or special state appointee made a directly applicable regulatory or licensing decision.
- ☐ IC 4-2-6-11(c): Particular matter restriction prohibiting the former state employee or special state appointee from representing or assisting a person in a particular matter involving the state if the former state officer, employee, or special state appointee personally and substantially participated in the matter as a state worker. *(Please provide a brief description of the specific particular matter(s) to which this waiver applies below):*

- B. IC 4-2-6-11(g)(2) requires that an agency's appointing authority, when authorizing a waiver of the application of the post-employment restrictions in IC 4-2-6-11(b)-(c), also include specific information supporting such authorization. Please provide the requested information in the following five (5) sections to fulfill this requirement.

1. Please explain whether the employee's prior job duties involved substantial decision-making authority over policies, rules, or contracts:

Greg Harrell currently serves as the Assistant Commissioner for Public Policy & Strategic Partnerships at the Indiana Commission for Higher Education (Commission). In his role, he coordinates the agency's public policy efforts in which he regularly interfaces with members of the Indiana General Assembly, higher education institutions, and workforce-focused state agencies. Mr. Harrell's role also involves leading the implementation of new policies, programs, and partnerships created by legislation or Executive Orders that impact the Commission.

Mr. Harrell does have decision-making authority over several contracts and agreements where he is responsible for negotiations, overseeing the selection process, and serving as the primary point of contact. However, he does not have signatory authority.

2. Please describe the nature of the duties to be performed by the employee for the prospective employer:

As Executive Director of Policy & Government Affairs at the Institute for Quality Education Mr. Harrell would be responsible for developing and advocating for legislative and policy solutions to improve the quality of K-12 education for Hoosier students and families. Mr. Harrell would regularly interact with key organizations and stakeholders, including, but not limited to, state lawmakers, policymakers, the Office of Education established by Executive Order 25-07, the Indiana State Board of Education, Indiana Department of Education, and the Indiana Charter School Board.

3. Please explain whether the prospective employment is likely to involve substantial contact with the employee's former agency and the extent to which any such contact is likely to involve matters where the agency has the discretion to make decisions based on the work product of the employee:

It is unlikely that Mr. Harrell's prospective employment would involve substantial contact with the Commission. The Commission is a coordinating agency for higher education and administers the state's financial aid programs, whereas the Institute for Quality Education advocates for K-12 policies which advance the quality of education for all students. Moreover, the Commission does not have any active contracts or grant agreements with the Institute for Quality Education. The state agencies with which Mr. Harrell would have substantial contact in his prospective employment role will be K-12-centric, not in higher education, including, but not limited to, the Office of Education established by Executive Order 25-07, the Indiana State Board of Education, Indiana Department of Education, and the Indiana Charter School Board.

4. Please explain whether the prospective employment may be beneficial to the state or the public, specifically stating how the intended employment is consistent with the public interest:

Mr. Harrell's prospective employment is beneficial to both the state and the public. In his current position, Mr. Harrell has coordinated and implemented public policy efforts that have increased postsecondary access, affordability, and attainment for Indiana residents. The state has been recognized as a national leader in these areas during Mr. Harrell's tenure. Having Mr. Harrell lead efforts at the Institute for Quality Education to increase and improve educational options for Hoosier families would be invaluable due to Mr. Harrell's experience in state government and deep understanding of issues impacting Indiana's educational landscape.

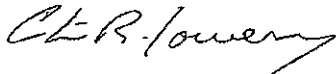
5. Please explain the extent of economic hardship to the employee if the request for a waiver is denied:

Denying this post-employment waiver would present an economic hardship for Mr. Harrell as he would not have the opportunity to further his career. He is a skilled professional and has contributed greatly to the State of Indiana during his nearly ten-year tenure at the Commission. A role at the Institute for Quality Education in which he will lead public policy and government affairs will provide him with more opportunities to grow than are available at the Commission.

C. Signatures

1. Appointing authority/state officer of agency

By signing below I authorize the waiver of the above-specified post-employment restrictions pursuant to IC 4-2-6-11(g)(1)(A). In addition, I acknowledge that this waiver is limited to an employee or special state appointee who obtains the waiver before engaging in the conduct that would give rise to a violation.



Chris Lowery, as Appointing Authority
Commissioner for Higher Education

July 3, 2025

DATE

2. Ethics Officer of agency

By signing below I attest to the form of this waiver of the above-specified post-employment restrictions pursuant to IC 4-2-6-11(g)(1)(B).



Dr. Matthew Butler,
Commission for Higher Education

July 3, 2025

DATE

D. Approval by State Ethics Commission

FOR OFFICE USE ONLY

Approved by State Ethics Commission



Katherine Noel, Chair, State Ethics Commission

7-10-25

Date

Mail to:

Office of Inspector General
315 West Ohio Street, Room 104
Indianapolis, IN 46202

OR

Email scanned copy to: info@ig.in.gov

*Upon receipt you will be contacted with
details regarding the presentation of this
waiver to the State Ethics Commission.*