

Conflict of Interest Policy

CONFLICT OF INTEREST POLICY for LRAC Board/Grant Review Panels: The LRAC will use the guidelines established by Minnesota Rules, Chapter 1900.0410, Subp.5 to guide its actions. Review of the Conflict of Interest Policy will be done by:

- a. Each new reviewer shall be required to review a copy of this policy and to acknowledge in writing that he or she has done so.
- b. Each reviewer shall annually complete a disclosure form identifying any relationships, positions or circumstances in which the reviewer is involved that he or she believes could contribute to a Conflict of Interest arising. Such relationships, positions or circumstances might include service as a director of or consultant to a nonprofit organization. Any such information regarding interests of a reviewer or a reviewer's family member shall be treated as confidential and shall generally be made available only to the Chair, the Executive Director, and any committee appointed to address Conflicts of Interest, except to the extent additional disclosure is necessary in connection with the implementation of this Policy.
- c. This policy shall be reviewed annually by each member of the Board of Directors. Any changes to the policy shall be communicated immediately to all reviewers.

CONFLICT OF INTEREST POLICY for LRAC Staff: The LRAC will use the guidelines established by Minnesota Dep. Of Administration's Policy Number: 08-01 Conflict of Interest Policy for State Grant-Making to guide its actions in regard to LRAC staff conflict of interest.

- a. A conflict of interest, actual, potential, or perceived, occurs when a person has actual or apparent duty or loyalty to more than one organization and the competing duties or loyalties may result in actions which are adverse to one or both parties. A conflict of interest exists even if no unethical, improper or illegal act results from it.
- b. All LRAC staff involved in the processing and review of grant applications must complete and sign a conflict of interest disclosure form for each grant review in which they participate. On the conflict of interest disclosure form, each staff must identify any grant applicant with which they have an actual, potential or perceived conflict of interest, although they do not need to provide the reason for the conflict on the disclosure form.

- c. LRAC staff must act immediately upon any suggestion, inquiry, or intimation that a conflict of interest exists at any point in the grants process. Upon identification, such matters are referred to the staff's immediate supervisor for additional discussion to identify and mitigate any potential conflicts. If the conflict involves the staff's immediate supervisor, the staff should instead contact the LRAC Executive Committee.
- d. If it is determined that an actual, potential or perceived conflict of interest exists, as defined by this policy or other relevant law, it is important that the appropriate steps must be taken to avoid the conflict. These steps may include:
- Reassigning the duties associated with that particular applicant, grant or grantee to another staff.
 - Requiring the staff to remove themselves from application processing, the discussion of or decision about a particular applicant(s) that is affected by the conflict.

At minimum, all internal parties who are involved in the grant process, review or grant management process must be made aware that an actual, potential or perceived conflict has been disclosed and evaluated, even if it is not serious enough to remove or reassign the staff.

Any disclosed conflicts and their resolution should be noted in meeting minutes, documents or records that the LRAC keeps as a regular part of its grants process.

(Updated and Approved July 2019)