

CONFLICT OF INTEREST POLICY FOR GRANT REVIEW AND EVALUATION ADVISORY COMMITTEES

Effective Date: March 6, 2024

Supersedes: October 1, 2023

Approved:



POLICY STATEMENT

Advisory committee members must uphold a high ethical standard and work deliberately to avoid actual or potential conflicts of interest in the grant review and evaluation process.

Every grant reviewer for competitive grants processes is responsible for identifying where an actual or potential conflict of interest exists and recusing themselves from scoring projects, as necessary. All advisory committee members involved in the review and evaluation of competitive grant applications must complete and sign a conflict of interest disclosure form for each competitive round in which they participate.

- Advisory committee members must identify any grant application with which they have an actual or potential conflict.
- Advisory committee members with an actual conflict of interest must recuse themselves from scoring grant applications with which they have an actual conflict and recuse themselves or discuss any potential conflicts of interest with RCO staff.
- Advisory committee members are not required to explain the reason for recusing themselves from scoring.
- It is up to advisory committee members to identify actual or potential conflicts of interest; however, RCO staff may also identify actual or potential conflicts of interest.
- RCO staff may remove advisory committee members' scores if an actual or potential conflict of interest is identified.

Advisory committee members can avoid conflicts of interest and other ethics violations by being aware of statutory restrictions, adhering to such restrictions, using good judgment, and being fair and equitable in decision-making. Review [Revised Code of Washington 42.52](#), which is the statutory code of ethics for public officials, for more detail.

Because RCO is involved in awarding grants, it is a "Section 4" agency, which means that stricter provisions of the ethics law apply. Limitations are summarized below (see Revised Code of Washington

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42.52.150 for full reference). Staff and members of advisory committees may accept only very limited items from a person seeking to provide goods or services to RCO, or a grant sponsor or potential sponsor.

The limited items that may be accepted are the following:

- Unsolicited promotional items of nominal value (e.g., pens) or tokens of appreciation (e.g., plaque or wall memento).
- Informational material, publications, or subscriptions related to the member's performance of official advisory committee duties.

DEFINITIONS

Advisory Committee Member – An advisory committee member is appointed by RCO's director to serve as a member of a committee that participates in technical review and evaluation meetings for RCO competitive grant proposals. Committees may include representatives from state and federal agencies, local governments, nonprofits, Tribes, and community members.

Conflict of Interest – A conflict of interest occurs when a person has actual or apparent duty or loyalty to more than one organization, and the competing duties or loyalties or personal interest 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.

Actual Conflict of Interest – An actual conflict of interest occurs when an advisory committee member uses or attempts to use their position to secure benefits, privileges, exemptions or advantages for self, relatives, or organizations with which the person is associated. For example, committee members must recuse themselves if any of the following actual conflicts apply:

- An advisory committee member is an employee or board member of a grant applicant organization or family member of anyone involved in the project or program.
- An advisory committee member bids on projects or otherwise benefits personally from projects reviewed or scored while on an advisory committee.
- An advisory committee member accepts payments for expenses incurred in connection with a speech, presentation, or appearance made as an advisory committee member.
- An advisory committee member accepts payments for seminars and educational programs.

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Potential Conflict of Interest – A potential conflict of interest may exist if a person has a relationship, affiliation, or other interest that could create an inappropriate influence if the person is called on to make a decision or recommendation that would affect one or more of those relationships, affiliations, or interests. These situations can be evaluated on a case-by-case basis. For example:

- The advisory committee member works in a volunteer capacity for a grant applicant or grantee organization.
- The advisory committee member is employed by an organization that submits a letter of support for a grant project that is reviewed or evaluated.
- The advisory committee member frequently recreates or uses the grant application facility or area.
- Any situation in which a reasonable third party would conclude that conflicting duties or loyalties exist.

PROCEDURES

- Advisory Committee members review the Conflict of Interest Policy and complete the **Conflict of Interest and Bias Awareness Acknowledgment Form**.
- Advisory Committee members recuse themselves from commenting on or scoring applications with which they have identified an **actual conflict of interest**.
- Advisory Committee members recuse themselves from scoring projects with which they have identified a **potential conflict of interest**. If the member is unclear if there is a potential conflict of interest, RCO requires that the committee member discuss the application with RCO staff.
- RCO staff documents potential conflict of interest discussions.
- RCO staff reviews scores and recusals.