

Policy Title	Conflicts of Interest - Commissioners
Effective Date	December 1, 2023
Last Revised	
Approved By	Aaron L. Myers II Executive Director
Attachments	None
Cross-References	None

PURPOSE
The purpose of this policy is to establish the guidelines and procedures by which the DC Commission on the Arts and Humanities seeks to ensure the avoidance of any conflict of interest on behalf of staff, contracted personnel, and CAH Commissioners (“commissioners”)—whether real or perceived—in carrying out agency business.
AUTHORITY
DC Code §§ 39-204 to 205; 1-1162.23; and 1 DCMR 5002.6.
APPLICABILITY
This policy applies to all DC Commission on the Arts and Humanities (CAH) staff, contracted personnel, and commissioners. This policy applies to any involvement in the review, determination, and formulation of grant awards, contracts, Memoranda of Understanding/Agreement, procurements, sponsorships, and in-kind support.
POLICY
<p>A. At the beginning of each fiscal year, each commissioner shall file with the Chairperson and the Executive Director a written statement disclosing:</p> <p>A.1. Organizations and/or individuals reasonably expected to be eligible for Commission support in which the commissioner or their immediate family members have financial or policy-making interest, and/or</p> <p>A.2. Organizations and/or individuals with the appearance of such an interest, i.e., if the commissioner or their immediate family members are an employee, member, director, or</p>

officer of any organization that has applied to, or could be reasonably expected to apply to the Commission for a grant.

- B.** It is the responsibility of commissioners to notify the Chairperson and the Executive Director of any changes to this disclosure during the year.
- C.** During the first meeting of each fiscal year, the Chairperson shall acknowledge each commissioner's disclosed conflicts of interest.
- D.** If an individual or organization presents a real or perceived conflict of interest for a commissioner and applies for or seeks assistance with a grant or other any other support from the Commission, that commissioner shall:
 - D.1.** Refer the Chairperson and Executive Director to their previously submitted disclosure to identify the organization and describe the nature of the conflict of interest before the grant application is considered by an advisory panel, committee, or the full Commission.
 - D.1.1.** If the Chairperson is the commissioner with a conflict, the Chairperson shall delegate his or her duties outlined in this paragraph to the Vice Chair.
 - D.1.2.** If the conflict exists but is not detailed in the most recent disclosure information, the conflicted commissioner shall notify the Chairperson and submit an updated list of known conflicts.
 - D.2.** Neither communicate with nor attempt to influence any commissioner or any member of an advisory panel regarding the grant application.
 - D.3.** Not be present, neither physically nor virtually, if that specific grant application is considered by the full Commission, a committee of the Commission, or an advisory panel.
 - D.4.** Not have access to any materials received by the Commission as part of the grant application, advisory panel scores or comments, or award funding recommendations for the grant program in question prior to the official award announcement by the agency.
- E.** To act in the public interest while upholding the duty of loyalty through the appropriate level of confidentiality, commissioners will receive a comprehensive report of recommended grant application finalists, with names and budget redacted, in advance of a full Commission meeting to consider funding recommendations for post-paneled grant applicants. The report shall identify grant applicants by ward, total panel score, previous year award, and current year recommendation amount.
 - E.1.** The report shall not contain the name or organizational budget of any organization. The Chairperson will recuse any commissioner with a conflict from voting on that grant program.
 - E.1.1.** Should the Chairperson have a conflict, he or she shall temporarily delegate duties to the Vice Chair and recuse him or herself.

- F.** Agency staff and contractors are prohibited from serving as an employee, member, director, or officer of any organization that has applied to, or could be reasonably expected to apply to the Commission for a grant.
- G.** Agency staff, contractors, commissioners, and their immediate families are ineligible to apply for any grants or other support from the Commission available for individuals.
- H.** The Leadership Team shall periodically review all grantmaking policies and procedures for any necessary updates.
 - H.1. Changes, revisions, and updates shall be initiated by the Leadership Team, comprised of the Executive Director, Deputy Director, and each team’s manager, when required by statutory or regulatory changes, or based on changes to Agency practice to improve performance.

DEFINITIONS

Fiscal Year: The District of Columbia budget operates in what’s known as a fiscal year that begins October 1 and ends September 30.

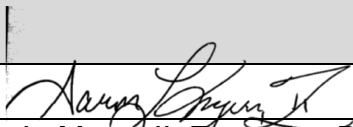
Open Meetings Act: The District of Columbia Open Meetings Act requires that any gathering of a quorum of a public body where members consider, conduct or advise on public business offer the opportunity for the public to observe the meeting.

Post-paneled: The pre-award phase of a grant after applications are reviewed through the CAH panel process.

ATTACHMENTS

None.

AUTHORIZATION

	12/1/2023
Aaron L. Myers II, Executive Director	DATE