



## **Managing Conflicts of Interest Related to Funding Applications**

As outlined in the Administrative Processes section of the Code of Conduct/Conflict of Interest policy, ALMA Associates and employees are to be forthright in declaring any real or apparent conflicts of interest.

- A. In the case where an ALMA employee or Board/Committee member is assigned to REVIEW a funding submission for which they have declared a perceived or actual conflict of interest, the following procedure will be followed:
1. The CEO or Code Administrator will consider this matter a high priority and take immediate steps to ensure that the disclosing party:
    - is immediately removed from all discussions regarding the application;
    - is immediately excluded from receiving any information regarding the application;
    - is removed from all technical and board reviews of the application; and
    - has no opportunity to vote on or influence a recommendation or decision concerning the application.
  2. The application will proceed through the normal process as necessary which includes technical review, CEO, Programs and Service Committee, and Board of Director approvals.
- B. In the case where an ALMA employee or Board/Committee member has a DIRECT INTEREST in a funding submission for which they have declared a conflict of interest, the following ADDITIONAL procedure will be followed:
1. Upon completion of the normal process, a 3 person review panel will be convened to review the application again from an ethics and conflict position. The panel will be composed of external, arms-length professionals familiar with the relevant programs and the conflict situation, and who were not involved in earlier reviews of the application.
  2. The review panel's decision related to accept or reject the application will be final.
  3. From the onset of the disclosure, records of all decisions related to the review of the application, including the names of the reviewers, will be clearly documented.