

 ILLINOIS CRIMINAL JUSTICE INFORMATION AUTHORITY	Subject: Conflict of Interest Policy	
	Department: Office of General Counsel	
	Effective Date: 8/14/23	
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ICJIA CONFLICT OF INTEREST POLICY

I. POLICY STATEMENT

This Policy is for identifying and addressing situations that involve, or may appear to involve, conflicts of interest, and to comply with applicable laws and regulations concerning conflicts of interest.

This Policy applies to each member on any ICJIA Board or Committee, ICJIA staff, any person and/or organizations in a covered transaction with ICJIA, or any person and/or organization that is contemplating entering into a covered transaction with ICJIA, including, but not limited to, award recipients and their key personnel, third-party vendors, and merit-based reviewers. This policy does not apply to members or potential members of bodies that only have advisory authority.

II. DEFINITIONS

See Appendix A.

III. EXPECTATIONS AND GUIDELINES

A. General Expectations and Guidelines

No Covered Party shall derive any personal profit or gain, including, without limitation, salary, publicity, etc., directly or indirectly, because of their service or relationship to ICJIA. ICJIA expressly prohibits the conduct of any private business or personal Covered Transactions between any Covered Party and ICJIA other than those conducted openly and objectively to ensure equal competitive opportunity and equal access to relevant information.

1. Expectations and Guidelines Specific to ICJIA Staff

ICJIA Staff may not engage in Covered Transactions with ICJIA beyond receipt of salary, personnel benefits and reimbursement for authorized expenses.

Staff members engaged in outside activities, such as participation in professional associations or community-based organizations' boards and secondary employment, must disclose the nature of such activities to the Ethics Officer for purposes of determining whether a conflict of interest exists. Secondary employment shall also follow the outside employment procedure of the ICJIA Employee handbook. Staff members are under a continuing obligation to regularly update the Ethics Officer of any changes to outside activities.

ICJIA staff must also disclose relationships with all grantees, current and prospective (including entities named in statute). Disclosure must be made as soon as possible. In the case of a prospective grantee, the disclosure must be made before any Covered Transaction is recommended for approval by the appropriate ICJIA Board/Committee.

2. Expectations and Guidelines Specific to Grantees, Subrecipients, and other Similar Covered Parties

As a Covered Party, grantees, current and prospective, are obliged to disclose to ICJIA any actual, potential, or perceived conflicts of interest, financial or otherwise, that could directly or indirectly affect the Covered Transaction at the time of application in accordance with 44 Ill. Adm. Code part 7000.330(f). If disclosure cannot be made at application, due to lack of knowledge or alternative grant-making process, it must be made in a timely manner, preferably before a final funding decision is made by ICJIA.

After grant award, conflicts of interest disclosure must be in writing and disclosed in accordance with the conditions of the applicable grant agreement.

Grantees must comply with provisions relating to conflicts of interest contained in the grant agreement and applicable conflicts of interest laws and regulations see Appendix B.

If a grantee has any question or information about a conflict of interest, actual, potential, or perceived, they should immediately contact their assigned grant monitor and/or the ICJIA Ethics Officer at CJA.OGCreport@illinois.gov.

3. Expectations and Guidelines Specific to Merit-Based Reviewers

As a Covered Party, merit-based reviewers must ensure they do not have any conflicts of interest or apparent conflicts of interest. Merit-based reviewers must disclose any actual, potential, or perceived conflicts of interest before evaluating any grant applications.

Merit-based reviewers may not participate in the evaluation and scoring of grant applications from an organization with which they, or a family member, are: (i) the intended recipient during the grant cycle under review; (ii) participates, in any capacity, with the applicant organization; and/or (iii) sitting members of the applicant organization's board or governing body.

Additionally, merit-based reviewers may not engage in the evaluation and/or scoring of a grant application where the action to provide ICJIA funds would directly, indirectly, or predictably affect the financial or personal interest of the merit-based reviewer, family member, or any person or organization with whom a merit-based reviewer is negotiating or has any arrangement concerning potential employment or has a financial interest.

Before participating in the evaluation process, invited merit-based reviewers must declare conflicts of interest in advance on a form provided by ICJIA. If a merit-based reviewer identifies a conflict of interest after the evaluation process has begun, they must notify ICJIA and refrain from further work. The affected grant applications will be reassigned to other non-conflicted merit-based reviewers.

ICJIA may remove a merit-based reviewer for failure to ensure the integrity of the grantmaking process. The reasons for removing a merit-based reviewer will be stated in writing.

IV. REPORTING AND MANAGING CONFLICTS OF INTEREST

A. Duty to Disclose Conflicts of Interest

All Covered Parties are expected to minimize conflicts of interest. As such, if an actual, potential or perceived conflict of interest is present, the Covered Party should take all reasonable steps to avoid the activity in question. If avoidance is not possible, Covered Parties have a continuing duty to fully disclose all material facts relating to any actual, potential or perceived conflict of interest that could reasonably be perceived to impair the independence or objectivity before a decision is made on the matter involved. Disclosure of any conflicts of interest, whether actual, potential or perceived, will be made through the disclosure form and submitted to ICJIA's Ethics Officer at CJA.OGCreport@illinois. See Appendix C.

B. Evaluation and Management of a Conflict of Interest

1. Assessment of Conflict of Interest

The Ethics Officer, in consultation with other appropriate personnel, will investigate all the material facts relating to identified potential conflicts of interest. The disclosing party must provide all the material facts of the Covered Transaction and identify all relevant parties to the Covered Transaction. The Ethics Officer will determine whether an actual, potential or perceived conflict of interest exists.

If a conflict of interest exists, the Ethics Officer will decide, on a case-by-case basis, what action should be taken concerning the conflict of interest in accordance with ICJIA policies and applicable state and federal laws and regulations.

The Ethics Officer will make a good faith determination about the actions to be taken to properly manage the conflict of interest in a manner that is both fair to all Covered Parties and in the best interest of ICJIA and the State of Illinois. See Appendix D for relevant factors.

The Ethics Officer may allow the conflicted Covered Transaction upon a written determination that it is in the best interest of ICJIA and the State of Illinois to do so. However, before approving the Covered Transaction, the Ethics Officer shall evaluate what safeguards have been implemented based on the particular circumstances and document specific actions that have been and will be taken to manage the conflicted Covered Transaction. See Appendix F for examples.

3. Abstention/Recusal

The disclosing party shall not be present while ICJIA personnel are in any discussions relating to the conflicted Covered Transaction, except when invited for a presentation of the materials facts or responding to follow-up

questions. If the disclosing party is a decision-maker, they may only participate in the information-gathering stage of Board/Committee discussions. A conflicted decision-maker will announce the conflict and recuse from discussions to not unduly influence the deliberations on the Covered Transaction as well as from voting on the Covered Transaction.

4. Documentation

ICJIA will maintain appropriate documentation of the disclosure, evaluation, and disposition of all conflicts of interest, whether actual, potential or perceived.

5. Monitoring and Ongoing Assessment of a Managed Conflict of Interest

All conflicts of interest that are deemed manageable by the Ethics Officer and have a management plan in place shall be monitored by the assigned grant specialist on an ongoing basis to ensure compliance with this Policy and applicable state and federal laws. Management plan compliance must be addressed at each and every site visit. Covered Parties and persons involved in the management of a conflicted Covered Transaction may be required to provide updated documentation to the grant specialist on continuing activities or new reportable activities that may occur throughout the duration of the conflicted Covered Transaction.

6. Retrospective Disclosure and Review

In the event, a Covered Party becomes aware of an actual, potential or perceived conflict of interest after ICJIA has taken action related to the Covered Transaction or the Covered Party fails to disclose the conflict of interest before action being taken, the Covered Party must still disclose the conflict of interest immediately. The Ethics Officer will conduct a retrospective review of the situation following this Policy and recommend appropriate action to manage, reduce, or eliminate the undisclosed conflict of interest.

VI. INTERPRETATION AND NONCOMPLIANCE

A. Interpretation of this Policy

In interpreting the provisions of this Policy, the Ethics Officer will rely on its good faith judgment as well as all relevant state and federal laws and regulations. Questions about the application and interpretation of this Policy should be directed to the ICJIA Ethics Officer who makes all determinations regarding conflicts of interest.

B. Violation of the Policy

If ICJIA has a reasonable belief that a Covered Party has failed to disclose an actual, potential or perceived conflict of interest, it shall promptly inform the affected Covered Party of the basis of such belief and allow the Covered Party to explain the alleged failure to disclose. The Ethics Officer will then investigate as warranted by the circumstances and shall take appropriate action as authorized by statute, regulations and the conditions of the grant agreement.

C. Retaliation Prohibited

No person, who in good faith, reports a concern to the ICJIA Ethics Officer or relevant government agency shall be subject to retaliation or, in the case of an employee, adverse employment consequences by ICJIA. Such

persons are protected under pertinent laws, including, without limitation, the Illinois Whistleblower Act (740 ILCS 174) and 41 USC §4712.

VII. APPENDICES

Appendix A Basic Definitions

Appendix B: Applicable statutes and regulations

Appendix C: Sample COI Disclosure Form

Appendix D: Conflict Evaluation Factors

Appendix E: Examples of Conflicts of Interest

Appendix F: Examples of Conflict of Interest Mitigation

Appendix G: Tips for Communications with Grantees

APPENDIX A—BASIC DEFINITIONS

For purposes of this Policy, the terms below are defined as follows:

Affiliation means any Covered Party's close relationship with any organization or business entity which has obtained, is seeking, or is likely to seek, a grant or some form of Covered Transaction or economic relationship with ICJIA, and includes, but is not limited to, a Covered Party's current or former (within the last 12 months) service as a board/committee member, trustee, key personnel, employee, advisor, or consultant to a current or potential grantee, service provider, or other party doing business with ICJIA.

Award has the same meaning as in 44 Ill. Admin. Code 7000.30.

Conflicts of Interest are a set of circumstances that create a risk that the professional judgment or actions regarding the interests of ICJIA will be unduly influenced by a Covered Party's actual or perceived personal interest in the outcome. The personal interest may be economic, that is, it may result in a financial benefit for the Covered Party or a family member of the Covered Party, or the personal interest may be professional or sentimental, such as when the Covered Party or a family member of the Covered Party is on a proposed grantee's board of directors, committee, or advisory board or works for a proposed grantee. Conflict of interest transactions may result in violations of federal, state, and/or local applicable laws.

A **potential conflict of interest** is a situation in which a Covered Party has private interests that could conflict with their public duties or duties to ICJIA. This refers to circumstances where it is foreseeable that a conflict may arise in the future and immediate steps should be taken to mitigate that future risk.

The **appearance or perception of a conflict of interest** is a situation in which the public or a third party could form the view that a Covered Party's private interests could improperly influence their decisions or actions, now or in the future. Even if nothing untoward has occurred, the appearance of a conflict of interest can be just as damaging to ICJIA's reputation as an actual or real conflict of interest.

Covered Party/Parties are all person to which this policy applies and includes, without limitation, ICJIA Board/Committee members, staff, current grantees (and key personnel), prospective grantees (and key personnel), subrecipients at any tier (and key personnel), subcontractors of ICJIA grantees, vendors, and merit-based reviewers. This Policy also applies to any application for funds from ICJIA, whether such funding is through a grant, cooperative agreement, or contract.

Covered Transaction means any contract, intergovernmental agreement, grant agreement, or other similar arrangement involving ICJIA.

Disclosing Party refers to a Covered Party that has notified the ICJIA Ethics Officer and/or other appropriate ICJIA personnel that a Covered Transaction might pose an actual, potential, or perceived conflict of interest.

Economic Relationship has the same meaning as in 5 ILCS 420/1-105.2.

Economic Interest has the same meaning as interests outlined in 5 ILCS 420/4A.

Family Member means the Covered Party's spouse, domestic partner or equivalent, children, step-children, parents, step-parents, siblings, step-siblings, half-siblings, sons-in-law, daughters-in-law, grandparents, and

grandchildren, as well as the parents and grandparents of a spouse or domestic partner, or any persons living in the household of a Covered Party.

Financial Interest means an economic benefit, direct or indirect, that is received or that will be received or that will be received from any Covered Transaction (including a grant agreement) or another arrangement, involving ICJIA, including, but not limited to, a salary or other payments, forbearance or forgiveness of debt, gifts (beyond those allowed by relevant law), intellectual property rights, or any anything else of value.

A Covered Party may have a **financial interest** if they have, directly or indirectly, through business, investment, or a family member: (i) an ownership or investment in any entity or individual with which ICJIA has a Covered Transaction or arrangement, (ii) a compensation arrangement with ICJIA or with any Covered Party with which ICJIA has a Covered Transaction or arrangement, or (iii) potential ownership or investment interest in, or compensation arrangement with, a Covered Party with which ICJIA is negotiating a Covered Transaction. Compensation includes, without limitation, direct or indirect remuneration as well as gifts, or favors that are not insubstantial or in violation of the applicable federal or state gift ban laws.

Grant Agreement has the same meaning as in 44 Ill. Admin. Code 7000.30.

Grantee has the same meaning as in 44 Ill. Admin. Code 7000.30.

Key personnel/person means any person (whether or not an employee of the Covered party) who (i) has responsibilities or exercises powers or influence over the Covered Party as a whole similar to the responsibilities, powers, or influence of an executive director or officer; (ii) manages a department or unit that represents a substantial portion of the activities, assets, income or expenses of the Covered Party; or (iii) alone or with others controls or determines a substantial portion of the Covered Party's capital expenditures or operating budget. Concerning a grant, this term also includes the project director, manager, or any other personnel identified as key personnel in the proposed grant program.

Prospective Grantee (also referred to as **Applicant Organization**) is an organization that applies for an award of grant funds in response to a Notice of Funding Opportunity released by ICJIA.

Recipient has the same meaning as in 2 CFR 200.1. For purposes of this COI Policy, this term also includes applicant organizations that receive awards under the statutes of the State of Illinois.

Subaward has the same meaning as in 2 CFR 200.1.

Subrecipient has the same meaning as in 2 CFR 200.1.

APPENDIX B—APPLICABLE STATUTES AND REGULATIONS

The following is a non-exhaustive list of statutes and regulations pertinent to conflicts of interest:

- Required disclosures under 2 CFR 200.113 and 30 ILCS 708/35;
- Illinois Governmental Ethics Act, as amended, (5 ILCS 420)
- State Officials and Employees Ethics Act, as amended, (5 ILCS 430)
- Illinois Procurement Code (30 ILCS 500)
- Illinois Grant Accountability and Transparency Act (30 ILCS 708) and accompanying regulations in 44 Ill. Adm. Code part 7000
- Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR Part 200).

APPENDIX C—SAMPLE CONFLICT OF INTEREST DISCLOSURE FORM

Conflict of Interest Disclosure

All parties conducting business with the State of Illinois and/or Illinois Criminal Justice Information Authority (ICJIA), including award applicants and recipients of awards from the State of Illinois and/or ICJIA (collectively referred to herein as “Covered Parties”), must disclose in writing to ICJIA any actual or potential conflict of interest that could affect its relationship with the State and/or ICJIA. A conflict of interest exists if an organization's officers, directors, agents, employees, and/or their spouses or immediate family members use their position(s) for a purpose that is, or gives the appearance of, being motivated by a desire for a personal gain, financial or nonfinancial, whether direct or indirect, for themselves or others, particularly those with whom they have a family business or other close associations. In addition, the following conflict of interest standards applies to governmental and non-governmental entities.

Definitions:

Covered Party/Parties are all person to which this policy applies and includes, without limitation, ICJIA Board/Committee members, staff, current grantees (and key personnel), prospective grantees (and key personnel), subrecipients at any tier (and key personnel), subcontractors of ICJIA grantees, vendors, and merit-based reviewers. This Policy also applies to any application for funds from ICJIA, whether such funding is through a grant, cooperative agreement, or contract.

Governmental Entity. If the Covered Party is a governmental entity, no officer or employee of the Covered Party, member of its governing body or any other public official of the locality in which the award objectives will be carried out shall participate in any decision relating to a State award which affects his/her personal interest or the interest of any corporation, partnership or association in which he/she is directly or indirectly interested, or which affects the personal interest of a spouse or immediate family member, or has any financial interest, direct or indirect, in the work to be performed under the respective transaction with ICJIA, including a State award.

Non-governmental Entity. If the Covered Party is a non-governmental entity, no officer or employee of the Covered Party shall participate in any decision relating to the transaction with ICJIA, including, without limitations, a State award, which affects his/her personal interest or the interest of any corporation, partnership or association in which he/she is directly or indirectly interested, or which affects the personal interest of a spouse or immediate family member, or has any financial interest, direct or indirect, in the work to be performed under the respective transaction with ICJIA, including a State award.

The Covered Party shall also establish safeguards, evidenced by policies, rules, and/or bylaws, to prohibit employees or officers of the Covered Party from engaging in actions, which create or which appear to create a conflict of interest as described herein.

The Covered Party has a continuing duty to immediately notify the ICJIA in writing of any actual or potential conflict of interest, as well as any actions that create or which appear to create the perception of a conflict of interest.

Are there any current, potential conflict(s) of interest, or any actions that create or which appear to create the perception of a conflict of interest, related to the respective transaction with ICJIA, including, but not limited to, a State award for which your organization has applied?

☐ No

☐ Yes

If there are any current, potential conflict(s) of interest, or any actions that create or appear to create the perception of a conflict of interest, related to the respective transaction with ICJIA which your organization is entering, please describe them all here:

If the Covered Party provided information above regarding a current, potential conflict of interest or any actions that create or appear to create the perception of a conflict of interest, the Covered Party must immediately provide documentation to the applicable ICJIA personnel to support that the potential conflict of interest was appropriately handled by the Covered Party's organization. If the Covered Party believes the conflict can be managed, they must submit and receive ICJIA approval for a Conflict Management Plan prior to proceeding with the Covered transaction. ICJIA reserves the right to request additional information from the Covered Party about the disclosed actual, potential, or perceived conflict of interest. ICJIA also reserves the right to implement additional measures to manage or resolve the conflict of interest. If at any later time, the Covered Party becomes aware of any actual or potential conflict of interest, the Covered Party must notify ICJIA personnel immediately, and provide the same type of supporting documentation that describes how the conflict situation was or is being resolved.

Supporting documentation should include, but is not limited to, the following: the Covered Party's bylaws; a list of board members; board meeting minutes; procedures to safeguard against the appearance of personal gain by the Covered Party's officers, directors, agents, and family members; procedures detailing the proper internal controls in place; timesheets documenting time spent on the award; and bid documents supporting the selection of the contractor involved in the conflict, if applicable.

By signing this document, below, as the duly authorized representative of the Covered Party, I hereby certify that:

- All the statements in this Conflict of Interest Disclosure form are true, complete, and accurate to the best of my knowledge. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001).
- If I become aware of any situation that conflicts with any of the representations herein, or that might indicate a potential conflict of interest or create the appearance of a conflict of interest, I or another representative from my organization will immediately notify the ICJIA personnel.
- I have read and understand the requirements for the Conflict of Interest Disclosure set forth herein, and I acknowledge that my organization is bound by these requirements.

Covered Party Organization (Organization Name)

Signature of Authorized Representative

Date

Printed Title (Authorized Signatory Title)

Printed Name (Authorized Signatory Name)

APPENDIX D: CONFLICT EVALUATION FACTORS

Factors that may be considered by ICJIA when evaluating conflicts include, but are not limited to:

- Is the Covered Transaction expressly prohibited by applicable state and/or federal law (e.g. Illinois Governmental Ethics Act, 2 CFR Part 200)?
- The proximity of the Covered Party to the decision-making authority.
- If the disclosing party is a decision-maker, (i) whether there is a substantial threat to their independence of judgment has been created by the conflict of interest situation; (ii) the effect of the participation of the disclosing decision-maker on public confidence in the integrity of ICJIA's decision-making process; (ii) whether the participation of the disclosing decision-maker is likely to have any significant effect of the disposition of the Covered Transaction; and (iv) the need for the disclosing decision-makers contribution to the decision-making process, such as special knowledge of the subject matter of the Covered Transaction.
- The degree to which a Covered Party might benefit personally if the Covered Transaction is approved.
- The scope of the relationship amongst the involved parties (the longer and closer the associations the higher the risk of an unmanageable conflict of interest).
- Whether there are alternatives that achieve the same objectives through means that do not pose a conflict of interest and/or are not cost-prohibitive.
- Availability of feasible safeguard measures that protect ICJIA's mission.
- Adverse consequences that could result from approving the conflicted Covered Transaction (e.g., loss of ICJIA's credibility, unfavorable media coverage, objections by other grantees, government officials, etc.).

APPENDIX E—EXAMPLES OF CONFLICTS OF INTEREST

The following activities illustrate the types of actual, potential, or perceived conflicts of interest that should be avoided and/or disclosed, as applicable, in accordance with this Policy. This list is not all inclusive and is intended only to provide guidance.

Self-benefit:

- Using your position or relationship within ICJIA to promote your own interests or those of your family, including using confidential or privileged information gained in the course of employment at ICJIA for personal benefit or gain or for the personal gain or benefit of family members.
- Hiring an unqualified family member to fill a position instead of the most qualified candidate.
- Hiring a family member without conducting a competitive search and hiring process.

Influence peddling:

- Soliciting benefits for yourself or your family from outside organizations in exchange for using your influence to advance the interests of that organization within ICJIA.

Procurement and other business relationships and dealings:

- Approving grants or contracts with organizations in which you or your family have a significant financial or other interest or relationship, particularly if you are in a position to influence major decisions, are responsible for review, negotiation and approval of the grants or contracts, or otherwise direct ICJIA's business dealings with that business or entity.
- Hiring a third-party organization (e.g., consultant, vendor) where a family member of a Covered Party is employed without disclosing the relationship, even where fees paid are reasonable.
- Obtaining a loan of money or another extension of credit from a Covered Party.

Outside commitments:

- Serving on a board of an organization that receives money from or has applied for a grant award from ICJIA.
- Working a second job at an organization that has an economic relationship with ICJIA.

Property transactions:

- Directly or indirectly leasing, renting, trading, or selling real or personal property to or from ICJIA.

Use of ICJIA property for personal advantage:

- Using or taking ICJIA resources, including facilities, equipment, personnel, and supplies, for private use or other unauthorized non-ICJIA activities.

Recording or reporting false information:

- Misrepresenting, withholding, or falsifying relevant information required to be reported to external parties or used internally for decision-making purposes, to derive personal benefits.

Dealings with grantees:

- Personally, accepting anything of value from organizations or individuals that have grant proposals pending before ICJIA or have received grants from ICJIA.

- Employment or service on a board/committee within the last 12 months by a current grantee or prospective grantee.
- Voting to approve a grant from a prospective grantee that has provided you or a family member with a direct or indirect financial or personal interest.

APPENDIX F—EXAMPLES OF CONFLICT MITIGATION

- Public disclosure of the conflict of interest (e.g., at a public Board/Committee meeting or through communication methods routinely used by ICJIA).
- Appointment of an independent monitor capable of taking measures to address situations that may arise from the conflicted Covered Transaction once it is approved and put into effect.
- Modification of the legal documents, agreements in the Covered Transaction to include additional conditions and safeguards.
- Change in personnel or personnel responsibilities or reassignment of grants to a nonconflicted ICJIA monitor.
- Requirement for conflicted Covered Parties to recuse themselves from all discussions relating to the conflicted Covered Transaction for its duration.
- Restrictions or conditions about the use of ICJIA resources.
- Mechanisms to reduce, eliminate or manage the risk of bias in reviewing documentation provided by grantees, i.e., audit reports, invoices, or performance-related documentation.
- Requiring supplemental documentation from a Covered Party to justify actions taken under the Covered Transaction.
- Additional training on conflicts of interest.
- Termination of Covered Transaction if necessary, to avoid escalation of a conflict of interest where safeguards appear unlikely to succeed.
- Any other conditions deemed necessary to reduce or eliminate the risk that the conflicted Covered Transaction could adversely affect ICJIA's integrity and goodwill.

APPENDIX G: TIPS FOR COMMUNICATIONS WITH GRANTEES

Communications with grantees should adhere to the following guidelines:

- If a grantee is seeking assistance with the administration of its award, they should be directed to the appropriate grant monitor and encouraged to follow the established protocols for such communications as well as relevant provisions of the grant agreement.
- If an ICJIA Board/Committee member or staff receives a request to make an introduction to the ICJIA Board/Committee or key personnel, the grantee should be encouraged to refer those inquiries to **[NAME OF CONTACT/SECTION OF WEBSITE]**. ICJIA recognizes that in some instances a more personal response is desired, and in those cases, ICJIA Board/Committee members and staff are encouraged to refer those inquiries directly to **[NAME OF CONTACT]**. Unless required under the circumstances (i.e., introduction at a public meeting), Board/Committee members and ICJIA staff are discouraged from making direct introductions to avoid any sense of favoritism or the appearance of impropriety.
- ICJIA Board/Committee members and ICJIA staff may also be contacted by representatives or advocates of applicant organizations whose grant applications are either pending or have been declined by ICJIA. In such cases, Board/Committee members should refer those inquiries to appropriate ICJIA staff for a response and/or appeal under applicable laws and regulations.
Current ICJIA grantees may also reach out to ICJIA Board/Committee members or staff with questions or concerns. While ICJIA acknowledges the benefit of having strong relationships with its grantees, it is equally important to maintain its commitment to the highest professional and ethical standards. In these situations, Board/Committee members and staff are advised to notify appropriate ICJIA staff, i.e., the grantee's grant monitor, about the inquiry. Appropriate ICJIA staff will reach out to the grantee and respond in a manner that is compliant with ICJIA's policies and procedures