

## **National Historical Publications and Records Commission**

### *Resolution on Conflict of Interest*

The following resolution was adopted by the Commission at its meeting on February 21, 1985, with an amending resolution to Section C.5 on June 14, 1994 and an amendment resolution to Sections A.1 and A.2 on November 30, 2007:

The National Historical Publications and Records Commission takes cognizance of the relevant laws, codes of conduct, and regulations which bear on officers and employees of the United States Government, recognizing as well that its own members and staff fall into several distinct categories with respect to these provisions of law, codes of conduct, and regulations.

The Commission also recognizes that some of its members are drawn from the various disciplines and professional fields that are the subjects of proposals submitted to the Commission for consideration of grant assistance. The interests of the Commission require the participation and contribution of its members to the fullest extent possible; at the same time, the integrity of its process must be protected. To balance these two requirements, the Commission hereby adopts the following guidelines for its members and staff to supplement the above-mentioned laws, regulations, etc.:

A. For Commission Members:

1. The Commission will not consider a grant proposal wherein a Commission member is to receive any portion of salary or fees (compensation for services rendered) from the grant funding.
2. The Commission will consider a grant proposal, but the affected member will absent himself from deliberation and votes on the proposal and forego engaging in any activities that could give the appearance of preferential treatment, whenever that member:
  - a. is to serve as project director or provide direct and immediate supervision over the project personnel,
  - b. is indirectly connected through employment in the same institution,
  - c. would indirectly (i.e., remotely) supervise the project,
  - d. would serve as unpaid consultant and accept reimbursement for expenses incurred,
  - e. is an officer (titled or member of governing board) of the association or society submitting the proposal, or
  - f. was appointed to the Commission by the association submitting the proposal.

B. For Commission Staff Members:

3. A Commission staff member shall not serve as an officer (titled or member of governing board) of any association or society which has submitted a grant proposal within the past three years or is likely to submit a proposal in the future. In the event that such an association or society submits a grant proposal, the Commission will not give it consideration until the staff member's status is resolved.
4. The Commission will consider a grant proposal, but an affected staff member will refrain from any participation or analysis or recommendation thereon if the staff member was employed in other than an adjunct teaching capacity during the preceding two years by the association or institution submitting the proposal. The Commission may invite the staff member to join a discussion for informational benefit.

C. For the Commission Chairman:

5. The Commission will consider a grant proposal from an association or society in which the Chairman serves as an officer (titled or as a member of a governing board), provided the Chairman recuses himself/herself from deliberating and voting on the proposal and formally delegates to the Deputy Archivist or other senior official of the National Archives and Records Administration the authority to approve and dispense the grant funds.

D. General:

6. The Commission will consider a grant proposal and its members and staff may participate fully if the affected member or staff member is simply a member of the association or society submitting the proposal, but holds no office there nor was appointed to the Commission from such association.
7. In deliberate time after passage of this resolution and once each year before the Winter meeting\* of the Commission, every member and professional staff member will submit to the Chairman a list of the institutions and associations with which he or she is affiliated, indicating the nature of the affiliation. In addition, before each meeting of the Commission, a member or staff member shall send notification in writing to the Chairman of any potential conflict of interest that may exist or arise due to his or her affiliation with an institution or association applying for grant funding.
8. In any case of doubt, the Commission Chairman shall make a final determination whether a conflict of interest exists in light of this resolution.

\*The Winter meeting is currently held in November.