

Reviewer Ethical Obligations and Conflicts of Interest

As a Reviewer for the Institute of Museum and Library Services (IMLS), you play a vital role in ensuring the integrity of IMLS's peer review process. You are expected to perform your responsibilities objectively and impartially, and in accordance with the ethical and conflict-of-interest requirements described in this document. Before evaluating any applications, please review the requirements and guidance provided below. You will be asked to acknowledge that you have reviewed these materials and understand your responsibilities as a Reviewer. IMLS allocates up to one hour of your review time to consider these materials.

If you become aware of an actual or potential conflict of interest or any other circumstance that may affect your ability to serve as an objective and impartial Reviewer, please immediately contact the IMLS program officer coordinating your review. Questions about these requirements may be directed to IMLS's Designated Agency Ethics Official at ogcethics@imls.gov.

Reviewer Ethical Obligations

As an IMLS Reviewer, you are expected to:

1. **Act objectively and impartially.** Evaluate each application fairly and based on the applicable criteria in the relevant IMLS Notice of Funding Opportunity (NOFO).
2. **Disclose conflicts of interest.** Immediately disclose any actual, potential, or apparent conflict of interest involving an application assigned to you, including circumstances that could create an appearance of a conflict or loss of impartiality.
3. **Avoid preferential treatment.** Do not give preferential treatment to any applicant, institution, organization, or individual.
4. **Protect confidential information.** Maintain the confidentiality of applications and other nonpublic information obtained during the review process.
5. **Not misuse nonpublic information.** Do not use information obtained through the review process for your own benefit or for the benefit of any person or organization.
6. **Not use your position as an IMLS Reviewer** for personal or professional gain.
7. **Promptly disclose any changes in circumstances** to IMLS that occur during the review process that could affect your ability to provide an objective or impartial evaluation.
8. **Carefully follow IMLS instructions** concerning the review process and the proper handling of all application materials.

Reviewer Conflict of Interest Statement

As an IMLS Reviewer, you may receive a grant application that presents an actual or potential conflict of interest. A conflict may arise if you are involved with the applicant institution or the project described in the application, including as a paid consultant or through other financial involvement.

You must disclose any recent collaboration (generally within the past five years) with an applicant, co-author, or project staff member. A conflict may also arise from recent professional collaborations (generally within the past five years) with an applicant or project personnel, including co-authoring publications, serving on committees together, jointly supervising students, or co-developing projects.

A conflict may also arise if your spouse, child, or an individual with whom you have a close personal relationship is involved with the applicant, or if the application is submitted by an institution with which you, your spouse, child or an individual with whom you have a close personal relationship is negotiating for future employment.

A present financial interest is not the only basis for a conflict of interest. Due to a prior association as an employee or officer, consultant, or in another capacity, you may have gained knowledge of or developed a relationship with an applicant that could affect your ability to provide an objective and impartial review. Conflicts may also arise from professional, academic, or research-related rivalries or competition. If such circumstances could affect, or appear to affect, your impartiality, or if you believe you may have a conflict of interest with an application assigned to you, please immediately notify the IMLS program officer coordinating your review.

Conflict of Interest Guidance for Reviewers

Past employment or other associations with an applicant institution more than five years ago do not automatically disqualify you from serving as a Reviewer, provided the circumstances do not affect, or appear to affect, your ability to provide an objective and impartial review.

You must disclose any relationship or association with the applicant institution or project personnel if, within the past five years, you have had any of the following:

- **Professional collaborations**, such as co-authoring publications, serving on committees together, jointly supervising students, or co-developing projects.
- **Financial or consulting relationships**, including serving as a paid consultant or contractor, or having any other financial involvement with the applicant institution or project.
- **Other associations** that could reasonably call your impartiality or objectivity into question.

You must also disclose if your current employer, department, or organizational unit has a financial, operational, or other interest in the outcome of an application, even if you are not personally involved. When in doubt, disclose the relationship or association to the IMLS program officer coordinating your review so that IMLS can determine whether a conflict of interest exists.

You may still serve as a Reviewer even if your institution is an applicant in this grant cycle or if you were involved in an application submitted in this grant cycle, provided you do not review an application submitted by your own institution or an application in which you were involved. If these or any other existing circumstances may affect your objectivity, immediately notify the IMLS program



officer coordinating your review.

A conflict of interest may develop after you have reviewed an application, even if no conflict existed at the time of review. After reviewing an application, you must not use or disclose confidential information obtained through the review process for representing or assisting the applicant in dealings with IMLS or another federal agency concerning the application or any grant that may result from it, unless IMLS has provided prior written permission.

All submitted applications include confidential information. You must not use or disclose information included in applications for your own purposes or for the purposes of any institution or organization you represent. You must obtain prior written approval from IMLS before sharing any application information with anyone.

If you have any questions regarding conflicts of interest, please contact the IMLS program officer coordinating your review.

IMLS Reviewer Acknowledgement

I acknowledge that I have reviewed the IMLS Reviewer Ethical Obligations and Conflict of Interest requirements described above and understand my responsibilities as an IMLS Reviewer. I agree to comply with these requirements and to immediately disclose to IMLS any actual or potential conflict of interest or any circumstance that could affect my ability to provide an objective and impartial review.

Name (Printed)

Signature

Date

Note: The acknowledgement above confirms that you have reviewed and understand these requirements. You will separately be required to verify in IMLS's web-based reviewer system that you have no conflicts of interest for the applications assigned to you for review.