

## Complying with Ethical Obligations and Avoiding Conflicts of Interest

As a Reviewer for IMLS, you perform a vital role in ensuring the integrity of the IMLS's peer review process and must carry out your duties in accordance with government ethics rules. Before you evaluate applications, we ask that you review the following *General Principles of Ethical Conduct* and *Summary of the Conflict of Interest Laws*. You will be asked to certify compliance with the IMLS Reviewer Conflict of Interest Statement and Certification. IMLS allocates up to one hour of your reviewer time for you to consider these materials.

If, at any time in the course of performing your duties at IMLS, you believe you may have a conflict of interest, please contact the IMLS program officer coordinating your review process. Other questions about the ethics rules and responsibilities may be directed to IMLS's Designated Agency Ethics Official at [ogcethics@imls.gov](mailto:ogcethics@imls.gov); (202) 653-4787.

### General Principles of Ethical Conduct

1. Public service is a public trust, requiring you to place loyalty to the Constitution, the laws, and ethical principles above private gain.
2. You shall not hold financial interests that conflict with the conscientious performance of duty.
3. You shall not engage in financial transactions using nonpublic Government information or allow the improper use of such information to further any private interest.
4. You shall not, except pursuant to such reasonable exceptions as are provided by regulation, solicit or accept any gift or other item of monetary value from any person or entity seeking official action from, doing business with, or conducting activities regulated by IMLS, or whose interests may be substantially affected by the performance or nonperformance of your duties.
5. You shall put forth honest effort in the performance of your duties.
6. You shall make no unauthorized commitments or promises of any kind purporting to bind the Government.
7. You shall not use public office for private gain.
8. You shall act impartially and not give preferential treatment to any private organization or individual.
9. You shall protect and conserve Federal property and shall not use it for other than authorized activities.
10. You shall not engage in outside employment or activities, including seeking or negotiating for employment, that conflict with official Government duties and responsibilities.
11. You shall disclose waste, fraud, abuse, and corruption to appropriate authorities.
12. You shall satisfy in good faith your obligations as citizens, including all just financial obligations, especially those – such as Federal, State, or local taxes – that are imposed by law.
13. You shall adhere to all laws and regulations that provide equal opportunity for all Americans regardless of race, color, religion, sex, national origin, age, or handicap.



14. You shall endeavor to avoid any actions creating the appearance that you are violating the law or the ethical standards.

### **Summary of Conflict of Interest Laws**

**18 U.S.C. § 201** – Prohibits you from acceptance of bribes or gratuities to influence Government actions.

**18 U.S.C. § 203** – Prohibits you from accepting compensation for representational activities involving certain matters in which the United States is a party or has a direct and substantial interest.

**18 U.S.C. § 205** – Prohibits you from certain involvement in claims against the United States or representing another before the Government in matters in which the United States is a party or has a direct and substantial interest.

**18 U.S.C. § 207** – Imposes certain restrictions on you related to your activities after Government service.

**18 U.S.C. § 208** – Prohibits you from participating in certain Government matters affecting your own financial interests or the interests of your spouse, minor child, general partner, or organization in which you are serving as an officer, director, trustee, general partner, or employee.

**18 U.S.C. § 209** – Prohibits you from being paid by someone other than the United States for doing their official Government duties.

### **Reviewer Conflict of Interest Statement**

As a Reviewer or panelist for the Institute of Museum and Library Services (IMLS), you may receive a grant application for review that could present a conflict of interest. Such a conflict could arise if you are involved with the applicant institution, or in the project described in the application, as a paid consultant or through other financial involvement. The same restrictions apply if your spouse or minor child is involved with the applicant institution or if the application is presented on behalf of an institution with which you, your spouse or minor child is negotiating for future employment.

A present financial interest is not the only basis for conflict of interest. Through prior association as an employee or officer, you may have gained knowledge of the applicant that would preclude objective review of its application. Past employment (generally more than five years prior to submission of the application) does not by itself disqualify a Reviewer so long as the circumstances of your association permit you to perform an objective review of the application. If you believe you may have a conflict of interest with any application assigned to you for review, please notify us immediately.

You may still serve as a Reviewer even if your institution is an applicant in this grant cycle or you were involved in an application submitted in this grant cycle, as long as you do not review any application submitted by your own institution or any application in which you were involved.



However, if you believe that these or any other existing circumstances may compromise your objectivity as a Reviewer, please notify us immediately.

If an application presents no conflict of interest at the time you review it, a conflict of interest may still develop later on. Once you have reviewed an application, you should never represent the applicant in dealings with IMLS or another Federal agency concerning the application, or any grant that may result from it.

Pending applications are confidential. It is not appropriate, for your purposes or for the purposes of the institutions or organizations you represent, for you to make specific use of confidential information derived from individual applications that you read while you were serving as an IMLS Reviewer. Accordingly, you must obtain approval from IMLS before sharing any proposal information with anyone, whether for the purpose of obtaining expert advice on technical aspects of an application or for any other reason.

If you have any questions regarding conflict of interest, either in relation to a specific application or in general, please contact the IMLS program officer who is coordinating the review process.

### Certification

I acknowledge that I have reviewed the ethics training materials and the Conflict of Interest Statement above. To the best of my knowledge, I have no conflict of interest that would preclude my service to the Institute of Museum and Library Services.

\_\_\_\_\_  
Name (Printed)

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

**Note:** This is for your information only. You will verify that you have no conflicts of interest in IMLS's web-based reviewer system.