

SW MN Arts Council Grant Conflict of Interest Policy & Procedure

(Updated March 2023)

General: SMAC board, staff, family members, and individual artist grant panel members are ineligible to apply for SMAC grants for individual artists. (Panelists for one artist round or program may still apply in another artist round or program.) SMAC defines a family member as a spouse, domestic partner, parent, child or spouse of a child, brother, sister, or spouse of a brother or sister of a Responsible Person (employee, officer, or member of the SMAC Board of Directors).

SMAC Staff: In order to avoid perceived conflicts of interest, SMAC staff cannot:

- review pre-applications or provide official SMAC feedback on an application in progress from an applicant with which the staff member has listed a conflict of interest; the review services must be provided by another SMAC staff member.
- be voting members on the board of an arts organization within the SMAC service area.
- receive a salary, stipend, or honorarium from a grantee organization as part of a SMAC grant project.

SMAC staff members may volunteer or participate in arts programs, events, and activities led by organizations in the region. SMAC hourly staff members may receive salary, stipends, or honorariums from organizations within the SMAC service area, as long as the activities are not part of a SMAC grant project.

SMAC staff act as facilitators of the panel and board processes involved in granting and do not score or comment on applicants or applications. SMAC staff are required to record and sign a declaration of conflicts of interest with organizations and artists who may become applicants; however, staff are not required to leave the room or mute themselves/turn off cameras during panel or board discussions that may involve such conflicts.

Grant Review Panel Meetings: Out of fairness to all grant applicants, it is essential that SMAC maintain strict standards regarding conflict of interest issues. As a nonprofit organization receiving funds from both the state legislature and from individual donors, the board and grant review panelists must be at all times cognizant of the public trust with which they are charged.

SMAC has set up procedures to ensure that all grant applicants have the same opportunities to present information about their grant requests. Each applicant has access to staff assistance prior to the application deadline. After the grant deadline, if staff review discovers that there is missing information needed to meet eligibility requirements, applicants will be notified and allowed 48 hours after notification to provide the additional information or revisions to their applications. However, a complete application is ultimately the responsibility of the applicant. After the panel has met, there is no further opportunity for applicants to provide input regarding their applications except if the project had changed in a substantial way that would impact the grant application, such as circumstances preventing the project from being completed as planned.

During a panel meeting, any SMAC grant review panelist (including any SMAC board member serving as a grant review panelist) who has a conflict of interest regarding an application, either real or perceived, must declare that a conflict exists and leave the room or mute themselves/turn off their camera prior to any discussion and voting on that application. Panelists do not score or comment on any application for which they have declared a conflict of interest.

The panel is told that their recommendations are not public information until after the board has acted on them. Board, staff, and panel members may not share the panel recommendations with any person who is not a SMAC panel or board member until after the board of directors has acted upon the panel's recommendations. The only time an applicant would be privy to panel recommendations prior to board action is when an applicant representative serves on the SMAC Board of directors.

Applicants who contact the SMAC office requesting information following the panel meeting are told that we cannot release any information until after the board of directors has met and acted upon the recommendations of the panel. Applicants are not allowed to discuss their applications or comment on the recommendations of the panel with board members prior to board action.

SMAC Board of Directors Meetings: The minutes and recommendations from the grant review panel meeting are made available to the board members for their review in advance of the board meeting. Any SMAC board member who has a conflict of interest regarding an application, either real or perceived, must declare that a conflict exists and refrain from discussion or voting on an application with which they have a conflict. At the discretion of the SMAC president, a board member declaring a conflict of interest may be required to leave the room or mute themselves/turn off their camera prior to any discussion and voting on any application with which they have a conflict.

A grant application will be considered ineligible for funding consideration if there is found to be a breach of SMAC conflict of interest policies and procedures in connection with that application.

I agree to follow SMAC's Grant Conflict of Interest Policy & Procedure for Grant Panel Meetings as outlined above.

Panelist, Board Member or Staff Signature: _____ Date: __/__/__