

# NEBRASKA COMMISSION ON LAW ENFORCEMENT AND CRIMINAL JUSTICE

## OPERATING INSTRUCTION NUMBER 10

October 25, 2024

### GRANT PROCEDURES

- 001 PURPOSE:** The Nebraska Commission on Law Enforcement and Criminal Justice (hereinafter referred to as the Crime Commission or Grantor) is designated to administer various federal and state grant programs by the Governor or by state statute. It is the responsibility of the Crime Commission to ensure that (1) the requirements for each grant program are met, and (2) fair guidelines and procedures are implemented for the administration of all grants awarded to the Crime Commission, including procedures for awarding grant funds, sub-grant adjustments, reprogramming of turn back funds, suspension and termination of awarded funds and the continued monitoring of sub-grant projects.
- 002 SCOPE:** Applicable to Crime Commission members and staff, and all agencies receiving funds.
- 003 REFERENCES:** Neb. Rev. Stat. §43-2401 to §43-2412; §81-1415 to §81-1429.01; §81-1447 to §81-1451, §81-1843 to §81-1851, and 2 C.F.R. 200.
- 004 DEFINITIONS OF TERMS:** The following terms and definitions will be utilized for the purpose of this operating instruction:

**004.01 Activity Report:** A document prepared by the commission grantee which describes the activities which have occurred in connection with the funded project as required by the applicable grant program. This report includes the impact of the project, any problems encountered in the implementation of the funded project and how they were resolved, any statistics related to the Performance Indicators listed in the grant application, individual data of services provided if applicable or other data as required by federal or state guidelines.

**004.02 Applicant:** The agency that has submitted a grant application to the Crime Commission requesting funds from either a federal grant or state appropriated funds.

**004.03 Business Day:** Those days when the Crime Commission is officially open for business during a traditional Monday through Friday work week, not including federal and state holidays or weekends.

**004.04 Commission Funding Panel:** A three-person panel that consists of Crime Commission members without a conflict of interest in the grants being considered, to assist the Staff Review Committee in making funding determinations.

**004.05 Commission grantee:** The organization or entity that receives grant funds awarded by the Crime Commission.

**004.06 Conflict of Interest:** Includes situations where the individual would be required to take any action or make any decision that may cause financial benefit or detriment to him or her, a member of his or her immediate family, or a business or organization with which he or she is associated.

**004.07 Corrective Action Notice:** A notice given to the primary point of contact and authorized official on the commission grant notifying them of corrective action steps that must be taken with a deadline in order for the grant award to not proceed to suspension or termination.

**004.08 Division Section Director:** The individuals responsible for the supervision of the Youth Justice section and the Justice and Victim Services section of the Justice and Youth Programs Division. The individuals are responsible for assuring compliance with federal, state, and agency grant requirements and procedures.

**004.09 Executive Director:** The individual who is responsible for the supervision of the policies as established by the Crime Commission and has the powers and duties as outlined in Neb. Rev. Stat. §81-1425.

**004.10 Financial Point of Contact:** The individual on the Grant Award who is responsible to the Grantor for fiscal oversight of the grant award made to the applicant and for providing fiscal reports.

**004.11 Financial Report:** A report prepared by the commission grantee that shows expenditures and requests for funds.

**004.12 Grant Adjustment Request:** A request by the Project Point of Contact and/or the Financial Point of Contact submitted to the Grantor requesting a revision to one or more of the terms or conditions of the grant award.

**004.13 Grant Award:** A contractual agreement between the Crime Commission and applicant that awards funds, specifies terms, conditions, and approved project period.

**004.14 Grantor:** The Crime Commission which awards and administers funds from various state or federal grant programs.

**004.15 Grant Manager:** The individual within the Crime Commission that has been assigned to an organization for sub-recipient program and financial grant management.

**004.16 Grant Review:** The Grant Review shall be the second and final review before presentation to funding panel of grant applications by the Grantor's grant review committee.

**004.17 In-house Grant:** A grant that is awarded internally by the State Adminstrating Agency.

**004.18 Justice and Youth Programs Director:** The individuals responsible for the supervision of the division and assurance of compliance with federal, state, and agency grant requirements and procedures.

**004.19 Monitoring Plan:** A monitoring policy established by the Justice and Youth Programs Division that uses a risk-based methodology that outlines the minimum percentage or number of on-site visits and desk reviews that must be conducted each year. The plan should also describe other types of monitoring activities and tools that will be utilized in each program, and the type of documentation necessary for payment requests.

**004.20 Project Point of Contact:** The individual identified on the grant application and award as the main contact for the applicant/grantee to the Grantor and responsible for all correspondence between the two agencies. The Project Point of Contact cannot also be the fiscal officer.

**004.21 Reverted Funds:** Funds that are returned or deobligated after a grant award contract was terminated, expired, or voluntarily returned by a commission grantee, or reduced by the grantor due to unexpended funds on hand.

**004.22 Special Conditions:** A contractual agreement that must be signed by the commission grantee agreeing to the terms and conditions outlined by federal and state law and Crime Commission Rules and Regulations.

**004.23 Staff Review:** The review of grant applications by a committee of individuals knowledgeable in the particular grant area designated by the Division Section Director or designee which shall include recommendations on suitability of the grant application for the requested funds, conditions of any grant award and the amount to be awarded.

**004.24 Sub-Grant Closeout:** the process by which the grantor determines that all applicable administrative actions and all required grant activities have been completed by the commission grant recipient prior to completing the Federal Grant Closeout process or state end of year closeout process.

**004.25 Suspension:** The withholding of funds that have yet to be disbursed to the commission grantee based upon failure to meet any terms or conditions of the grant award.

**004.26 Termination:** An action by the Grantor to rescind the grant award when the commission grantee has not complied with the special conditions of the grant award.

**004.27 Turn back funds:** Any funds that are de-obligated to the Grantor after being awarded.

**004.28 Withdraw:** A request by an applicant to remove its application from consideration prior to any award recommendations, or when the applicant has failed to meet specified conditions or other requirements to receive the award as outlined by the Grantor.

**005 GRANT APPLICATION PROCESS:** The Crime Commission shall issue awards as competitive or noncompetitive as dictated by the federal award terms and authorizing federal or state laws. However, in the absence of such guidance, the following standards for a fair and impartial competitive grant process should be followed. In house grants, turn back/reverted funds, expiring funds, and non-competitive direct submission grants are not subject to the grant application and review process.

**005.01 Announcement of Availability of Funds (“Announcement”):** Notification of the availability of competitive funds shall be made by the Grantor to the appropriate entities as defined by the funded program guidelines.

**005.01A:** Such notification should include a reference to the federal or state funding source, the total amount of funds available, eligible applicants, the grant period, how to obtain applications, the funding priorities or purpose areas, other funding requirements, eligible and ineligible costs, timeline of the funding process, and how to obtain technical assistance. In addition, the following information must be included:

**005.01A(i): Rejection of Applications:** The Crime Commission reserves the right to reject any or all applications, to waive informalities and minor irregularities in applications received, and to accept any portion of the application, or all items proposed, if deemed in the best interest of the State of Nebraska to do so. Failure of the applicant to provide information requested in this Announcement or the grant application may result in the disqualification of the applicant. The fact that an applicant meets eligibility requirements and applies for eligible services does not guarantee funding.

**005.01A(ii): Acceptance of Application Content:** The final contents of the approved application become contractual obligations of the grant award issued to a successful applicant.

**005.01A(iii):** Announcements must contain the acceptable methods for submitting an application, and that submission in other formats not included in the funding announcement will not be accepted.

**005.01B Grant Application:** The Grantor shall prepare a grant application or solicitation that will be available to potential applicants on the Crime Commission website providing no less than four to six (4-6) weeks to submit a completed

application. When possible, other means shall be attempted to announce the availability of funds to ensure widespread availability of the information. The content of all grant application documents will be reviewed and updated as necessary by Crime Commission staff.

**005.01C:** All grant applications must be received by the Grantor on the designated date and time as specified in the grant application instructions. An application received after the deadline shall not be considered for funding. The Executive Director may extend the deadline for one or more grant applications if he or she determines that extenuating circumstances caused the application to be submitted after the deadline. The Executive Director shall notify the applicant within three (3) days via electronic mail of his or her decision.

**005.02:** Non-Competitive Direct Submission: In certain circumstances, the competitive application process may not always serve the best interests of the grant funding program, the Crime Commission, the applying agency, and/or the achievement of the grant program's outlined goals and objectives. The Direct Submission Provision is not to be utilized as a routine alternative to the competitive application process. It is designed solely for exceptional circumstances. Therefore, the Crime Commission may utilize Direct Submission Provisions as described herein:

**005.02A:** Eligibility for Direct Submission: An agency may be eligible to submit a project directly to the Crime Commission for approval, bypassing the traditional competitive application process as outlined above if such a course of action would be more conducive to effectively and efficiently meeting the Grant Funding Program's overall goals and objectives. Examples including but not limited to narrow priorities targeting specialized program areas with limited providers; targeting a certain geographic area of need with sole source providers; situations where posting a competitive solicitation for weeks with only one applicant would cause significant and unnecessary delays; situations when a service needs to start immediately; Advisory Boards determining projects, programs, or priority areas and wishes to seek direct applicants in accordance with their applicable procedures, etc.

**005.02B:** Criteria for Direct Submission: To exercise the Direct Submission Provision, the applying agency must provide a comprehensive justification outlining the following:

**005.02B(i):** The urgent nature or unique opportunity of the project.

**005.02B(ii):** How the project aligns with the Grant Program's goals and objectives.

**005.02B(iii):** How the direct submission would provide significant benefits that would be hindered through the competitive process.

**005.02B(iv):** A detailed assessment demonstrating that the project has been thoroughly vetted and does not present an undue risk to the Grant Program or its stakeholders.

**005.02C:** Upon receipt of a direct submission application, the Crime Commission staff will conduct a review of the project, assessing its merits, the validity of the provided justification, and its alignment with the Grant Program's goals. In the event the funding panel cannot convene within 14 calendar days, the Executive Director or designee shall have the ability to award the funds. The Executive Director or designee holds the authority to approve or deny the project or to require additional information or modifications before approval.

**006 STAFF REVIEW AND GRANT REVIEW OF GRANT APPLICATION:** All applications received by the deadline shall be reviewed by a staff review committee consisting of individuals who are knowledgeable in the particular grant area. Whenever possible, the staff review committee should consist of at least three (3) individuals.

**006.01:** Each member of the staff review shall assess each grant application per the requirements and guidelines for each grant program.

**006.02:** Members of the staff review shall meet to discuss the merits of each grant application and determine funding recommendations, or submit recommendations in writing to the administrator.

**006.03:** Review and funding recommendations will be based upon the following criteria:

**006.03A:** Eligibility of the applicant.

**006.03B:** Adherence to federal and/or state requirements and guidelines.

**006.03C:** Completeness, clarity, continuity and consistency of the written application. The written application shall include all sections and information as outlined in the grant application instructions.

**006.03D:** Ability and capacity of the proposed project to make an impact on the identified problem.

**006.03E:** Other resources available which address the problem or need of the proposed project, including an explanation of how the applicant's project proposal will work with and/or coordinate with existing resources.

**006.03F:** Cost effectiveness of the proposed project.

**006.03G:** Amount of grant funds available.

**006.03H:** The performance and/or ability of the applicant to manage a grant program.

**006.04:** The Staff Review may:

1. Vote to fund the project as indicated in the application;
2. Modify the application which may include additional conditions or requirements that the applicant must meet in order to receive funding; or
3. Deny the application for funding.

**006.05:** Grant review shall only take place after staff review when required by federal or state law, rules and regulations, or other operating instructions of the commission. The Grant Review Committee will conduct a review of the grant applications, taking into consideration the criteria listed in 006.03 of this chapter, and recommendations from the Staff Review Committee. The Grant Review Committee will submit a funding recommendation to the Commission Funding Panel.

## **007 COMMISSION FUNDING PANEL:**

**007.01:** The Commission funding panel will meet within 14 calendar days following the Staff Review or Grant Review if applicable, and will conduct a final review of the grant applications.

**007.02:** The Commission funding panel will be made up of three members of the Crime Commission who do not have a conflict of interest with any of the grants under consideration.

**007.03:** Applications and supporting materials will be sent to funding panel members electronically for their review no less than one week prior to the funding panel meeting.

**007.04:** The funding panel members will come to a consensus on funding determinations after reviewing all staff review and/or grant review recommendations with appropriate Commission staff.

**007.05:** The Commission funding panel members will report to the full Commission at the next quarterly Crime Commission meeting on the grants awarded, including any denials that were made.

**007.06:** If a Commission Funding Panel cannot meet within 14 calendar days following staff review and/or grant review, the Executive Director or designee shall have the ability to make the final funding determination and award the funds.

## **008 FUNDING DETERMINATIONS:**

**008.01:** The Staff Review Committee and/or Grant Review Committee when applicable will present application materials and decisions made during the staff review and/or grant review to the Commission funding panel. The Commission funding panel will consider

all information contained within the application, information contained in the application review forms if applicable, prior grant management, and input from the grant manager, Staff Review Committee, Grant Review Committee, and program requirements outlined in the grant announcement or other state or federal law.

**008.02:** Funding decisions made by the Commission funding panel are final.

**008.03:** The Executive Director will be asked to render a final decision on an award if the situation arises where there is disagreement between the Staff Review or Grant Review when applicable and the Commission funding panel.

**008.04:** Notification of final funding determinations will be provided within ten (10) business days from the date of the Commission funding panel's decision.

**008.04A:** For applicants who received funding, the notification will inform the applicant of the final status of the application, including the requirement to meet any conditions, the need to submit a revised budget and the steps necessary to obtain the grant award.

**008.04B:** For applicants who were denied funding, the notification will inform the applicant of the final status of the application and the reason(s) for the denial.

**009 GRANT AWARD PROCESS:** Once an applicant has received funding approval, the applicant must affirmatively accept a grant award and special conditions from the Grantor. A signed and approved grant award signifies the applicant is now a commission grantee and agrees to adhere to all special conditions. Applicants failing to submit required documentation or meet specified conditions for funding by the deadline will be considered withdrawn.

**009.01:** Applicants who are required to meet specified conditions and/or are required to submit revised budgets shall have up to fifteen (15) calendar days from the date of the notification as outlined in section 008 to satisfactorily meet those requirements. Exceptions to the deadline may be allowed when an extension has been approved by Division Section Director. Applicants failing to submit required documentation by the deadline will be considered as withdrawn.

**009.02:** Once an applicant has satisfactorily met all conditions and/or requirements, the Grantor shall prepare the grant award and special conditions and send to the applicant as appropriate.

**009.03:** In order to affirmatively accept the grant award, the applicant must have all necessary individuals from the program sign and return the grant award within fifteen (15) calendar days from the date of provision. Exceptions to the requirement may be allowed when an extension has been approved by the Division Section Director. Applicants failing to submit signed documentation by the deadline will be considered withdrawn.



**009.04:** Once all steps have been taken to accept the grant award and all necessary documents are received by the Grantor, the commission grantee (formerly applicant) will be eligible to receive funds from the Grantor as outlined in the grant award.

**009.05:** Failure to satisfactorily meet all additional conditions and/or to submit the required reports or documents by the deadlines, may result in the termination of the commission grantee's funds by the Executive Director. Such termination can be rescinded upon resolving the identified deficiencies. Reasonable efforts will be made by the division staff to work with the commission grantee prior to the termination of funds.

**010 MONITORING OF GRANT AWARDS:** All commission grantees shall be monitored based upon the Monitoring Plan requirements as established by the Grantor which shall include a review of the program activities and financial review of the expenditure of program dollars. Due to resource limitations and the number of commission grants made by the Crime Commission, most monitoring will be conducted through what is commonly referred to as a "desk review."

**010.01:** Each commission grantee's risk of noncompliance with federal/state statutes, regulations, and the terms and conditions of the award and special conditions for purposes of the determining the appropriate grantee monitoring level will take place annually in accordance with the factors outlined in the Monitoring Plan. The risk will determine the type and frequency of monitoring required for each commission grantee.

**010.02:** A written report shall be prepared and maintained electronically regarding the monitoring of each commission grant program reflecting compliance with grant guidelines, program activities, audit requirements, accomplishments and problems encountered, and financial review and comments about the program's operations. Reports should be completed within sixty (60) days of the monitor visit.

**010.03:** If during the monitoring process or the performance of the award, it appears that the conditions of the grant award or special conditions are not being fulfilled, the commission grantee shall be notified in writing regarding the results of the monitor and the necessary corrective actions. The corrective action notice will provide the following:

1. Identification of the issue;
2. Citation of the applicable law or regulation;
3. Recommendations for remedy; and
4. Information necessary to resolve the matter.

Commission grantees shall be given no more than thirty (30) calendar days to respond and demonstrate compliance to the corrective action notice. Extensions can be approved by the division staff not to exceed an additional ten (10) calendar days. Failure to comply with the grant award and/or special conditions may trigger the Suspension and Termination policy outlined in Section 13 herein.

**010.04:** Throughout the year, per staff discretion, the following may be performed:

1. Review financial and performance reports submitted by the commission grantee;
2. Review detailed financial and program data and information submitted by the commission grantee when no site visit is conducted. Documents to review may include but not limited to timesheets, invoices, contracts, and ledgers that tie back to financial reports; and
3. Regular communication with commission grantees and appropriate inquiries concerning program activities.

**010.05:** Failure of the commission grantee to satisfactorily meet any additional conditions and/or submit the required reports or documents by the deadlines, and after reasonable efforts have been made by the Grantor to assist the commission grantee in meeting specified requirements, may trigger the Suspension and Termination policy outlined in Section 13 herein.

**011 GRANT REPORTING:** All commission grantees shall be required to submit activity and financial reports electronically as prescribed by the grant award, special conditions, program guidelines, and/or as required by the state or federal funding entity.

**11.02 Financial Reports:** Expenses shall be entered into the Grantor's grant management system according to the award and special conditions to request reimbursement. All commission grant programs shall be on reimbursement basis. If the commission grantee is not submitting financial reports and requests for reimbursement as required, the project point of contact will be contacted by the appropriate staff of the Grantor to address the deficiencies. If the deficiencies are not eliminated by the deadline given, the Grantor shall provide a corrective action notice to the project point of contact and authorized official that the matter is proceeding to the Suspension and Termination Policy outlined in Section 13 and any steps necessary to correct the deficiencies before suspension and/or termination.

**011.02A:** The grantor shall have forty-five (45) calendar days to approve a payment request and submit for reimbursement of allowable and supported expenses. Expenses that are determined to be unallowable will be removed and considered denied. Expenses that are not adequately supported will be declined for reimbursement with notification to the point of contact submitting the reimbursement request on necessary steps to correct the deficiencies. If the deficiencies are not corrected by the timeline given, the Grantor shall provide corrective action notice to the project point of contact and the authorized official regarding the deficiency with the unsupported expenses. If the deficiency is again not corrected by the timeline given, the request for reimbursement will be permanently denied and considered non-reimbursable and unallowable by the grant. During this timeframe, the grant manager may withhold the payment of any funds to the commission grantee.

**011.03 Activity Reports:** Commission grantees shall submit activity data and reports to the Grantor as prescribed by the grant award, special conditions, program guidelines, and/or as required by the state or federal funding entity. If the commission grantee is not submitting reports and data as required, the project point of contact will be contacted by the appropriate staff of the Grantor to address the deficiencies. If the deficiencies are not eliminated by the deadline given, the Grantor shall provide corrective action notice to the project point of contact and authorized official that the matter is proceeding to the Suspension and Termination Policy outlined in Section 13 and any steps necessary to correct the deficiencies before suspension and/or termination.

## **012 GRANT ADJUSTMENTS:**

**012.01A:** A grant adjustment request must be submitted to the Grantor when any of the following has or will occur:

- a.** The focus of the funded project changes;
- b.** There is a change in the start or end date of the funded project;
- c.** A new Project Point of Contact, Fiscal Point of Contact, or Authorized Official is named for the awarded project; or
- d.** A transfer of dollars between line items is needed as required by the Grantor.

No budget revisions (awarded or matching dollars) are to be made by the commission grantee receiving funds without prior approval from the appropriate grant division staff unless otherwise provided by law.

**012.01A (1):** The Grant Manager shall review the grant adjustment notice and if approved, the request will be processed. The approved request will then be treated as an amendment to the grant award.

**012.01A (2):** If the grant adjustment notice is denied after review by the division staff, the program will be notified in order to determine what options, if any, exist for further consideration.

## **013 SUSPENSION AND TERMINATIONS:** Funds for commission grants may be suspended or terminated for reasons outlined in this operating instruction. In order to suspend or terminate the funding for a commission grant, the following procedures shall be followed:

**013.01:** Suspension of commission grant funding may occur when the commission grantee is in non-compliance with any state or federal law, state or federal guidelines or requirements, fails to adhere to the terms of the grant award and special conditions, fails to adhere to the grant program guidelines, or fails to follow the requirements of this operating instruction. If the commission grantee does not correct deficiencies outlined in the corrective action notice, the Justice and Youth Programs Director can suspend commission grant funding.

**013.01A:** The Justice and Youth Programs Director or designee shall notify the commission grantee of the suspension and provide the reasons for such suspension.

**013.01B:** The Justice and Youth Programs Director may reinstate a suspended grant if the reason(s) for non-compliance are corrected.

**013.01C:** If the suspended grant funds are not reinstated, the matter shall be forwarded to the Executive Director for termination.

**013.02:** Termination of commission grant funding may occur when the commission grantee is in noncompliance with any state or federal law, state or federal guidelines or requirements, fails to adhere to the terms of the grant award and special conditions, fails to adhere to the program guidelines, or fails to follow the requirements of this operating instruction. The Justice and Youth Programs Director or designee shall notify the commission grantee of the termination decision by the Executive Director, and provide the reasons for the termination.

**014 TURNBACK /REVERTED FUNDS OR EXPIRING FUNDS:** All turn back or reverted funds will be placed back into the state or federal source from which they were awarded for reallocation to commission grantees unless the grant program has ended. If the grant program has ended, turn back or reverted funds shall either be lapsed to the state's general fund or returned to the federal grantor agency.

**014.01:** For all state and federal grant programs, the Director of Justice and Youth Programs is authorized to award turn back or reverted funds to existing or new commission grants. The expiration date of these funds is contingent on the funding source.

**014.02:** For all state and federal grant programs, when the timeline of the competitive application process would not allow adequate time for the awarding and use of said grant before the expiration of the funding source, (e.g., giving the commission grantee a 12-month project period to implement the project), the Director of Justice and Youth Programs is authorized to award expiring funds to existing or new sub grants.

**014.02A:** Existing sub grants demonstrating an additional need in the funding program areas must submit a revised budget for approval for the additional funds prior to the subgrant receiving an amended award and special conditions with the amended grant funding amount.

**014.02B:** New sub grants demonstrating a need in the funding program areas must submit a grant application and budget, the Crime Commission staff will conduct a review of the project, assessing its merits, the validity of the provided justification, and its alignment with the Grant Program's goals prior to receiving an award and special conditions.

## **015 Sub-Grant Closeout:**

**015A:** No later than 45 calendar days after the sub-grant's project period end date, the commission grantee must submit their final expenditure report for obligated funds or begin the process of fund reversion. All funds not obligated will be reverted on the 46<sup>th</sup> day back to the originating federal or state grant fund.

**015B:** At this time, the Grantor will begin the review of the commission grantee's file to initiate the closeout process.

**014C:** If deficiencies are identified during the sub-grant closeout review, division staff will work with the commission grantee to resolve these within five (5) business days.

**015D:** After the sub-grant closeout is complete, the federal Project Point of Contact will close out the federal grant award no later than five (5) business days from the federal grant's closeout due date.

**016 CONFLICT OF INTEREST:** Pursuant to 2 C.F.R. 200.112 and 200.113, the Crime Commission is required to use Federal funds in the best interest of the awarded programs. Decisions related to these funds must be free of undisclosed personal interest both in fact and in appearance. All Crime Commission employees, Staff Review members, and anyone working in any capacity on the grant application and/or review process must disclose in writing any potential conflict in interest to the grant-making component or pass through entity as applicable. Members of the Crime Commission shall not participate or vote on any review of grants and/or appeals pursuant to 2 C.F.R 200.112 and Section 007, 008, or that directly involve their agency, institution, or personnel.

**016.01A:** Anyone may raise the issue of a conflict of interest.

**016.01B: Conflict in Fact:** In the use of award funds (direct or indirect), a recipient or subrecipient should not participate in any decisions, approval, recommendations, investigation decisions, or any other proceeding concerning any of the following people or groups:

1. An immediate family member;
2. A partner;
3. An organization in which they are serving as an officer, director, trustee, partner, or employee;
4. Any person or organization with whom they are negotiating or who has an arrangement concerning prospective employment, has a financial interest, or for other reasons can have less than an unbiased transaction with the sub recipient.

**016.01C: Conflict in Appearance:** In the use of award funds, the following should avoid any action which might result in, or create the appearance of:

1. Using your official position for private gain;
2. Giving special treatment to any person;
3. Losing complete independence or objectivity;

4. Making an official decision outside official channels; or
5. Affecting negatively the confidence of the public in the integrity of the Government or the Program.

*Bryan Tuma*

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Bryan Tuma  
Executive Director

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