

National Freedom of Information Coalition

Conflict of Interest Policy and Requirements for Public Disclosure *Rules and Regulations*

It is the policy of the National Freedom of Information Coalition (NFOIC) that all members of the NFOIC Board of Directors and its staff are to avoid conflicts of interest or the appearance of conflicts of interest. All Board members and staff are expected to make decisions affecting NFOIC based solely on the best interests of the NFOIC. The purposes of this policy are to protect the integrity of the NFOIC and the decisions of its Board, and to ensure that the NFOIC's constituencies have confidence in the integrity of the NFOIC and its Board.

A Director or staff member shall be considered to have a conflict of interest if:

- (a) the Director or staff member has existing or potential financial or other interests which impair or might reasonably appear to impair the Director or staff member's independent, unbiased judgment in the discharge of his or her responsibilities to the NFOIC, or
- (b) the Director or staff member is aware that a member of his or her family (which for purposes of this Article shall be a spouse, parents, siblings, children, any other relative residing in the same household as the Director or staff member), or any organization in which the Director or staff member (or member of his or her family) is an officer, director, employee, member, partner, or trustee or has a controlling interest, has such existing or potential financial or other interests.

Board members of the NFOIC often serve on state coalitions that seek grant funding from an NFOIC pass-through grant. **This does not constitute a financial conflict of interest.** However, state coalition members are to abstain from voting on grant project proposals involving their own coalition. Should the Board seek further information concerning a proposal involving a board member, the Board should make every effort to contact other members of the coalition.

All Directors and staff members shall avoid actual or possible conflicts of interest and shall disclose to the Board any possible conflict of interest upon learning of the conflict. No Director shall participate in the discussion of or vote on any matter, at any Board or Committee meeting, in which the Director has a conflict of interest. The minutes of such a meeting shall reflect that the Director disclosed a conflict of interest and that the Director did not participate or vote on the matter. Any Director who is uncertain whether a conflict of interest exists in any matter shall request the Board or Committee to resolve the question by majority vote.

All Directors shall sign an annual form acknowledging and agreeing to abide by this Policy and disclosing any known conflicts of interest.

**NFOIC Board of Directors
Annual Conflict of Interest Disclosure Statement**

I have reviewed the attached Conflict of Interest Policy and I understand my obligation to comply with it.

The following is a list of all individuals, entities or organizations (for profit or non-profit) in which I or a member of my family is an officer, director, employee, member, partner, or trustee or has a controlling interest, which may be expected to engage in business transactions (other than payment of dues or grants) with the NFOIC or otherwise may present an actual or potential conflict of interest as defined in the Policy. If none, write "none."

I certify that the information provided above is correct to the best of my knowledge, information and belief, and I agree to promptly advise the Chair of the Board of any change in this information.

Name

Signature

Date _____

CC: NFOIC President
HQ