



**IC 4-2-6-11  
Post-employment waiver**

As the Appointing Authority of The Indiana State Museum and Historic Sites, I am filing this waiver of the application of the Code of Ethics' post-employment restriction as it applies to Santina Corsaro Sullivan in her post-contracting with SMARI (Strategic Marketing and Research Insights).

I understand that I must file and present this waiver to the State Ethics Commission at their next available meeting. I further understand that this waiver is not final until approved by the State Ethics Commission.

A. This waiver is provided pursuant to IC 4-2-6-11(g) and specifically waives the application of  
(Please indicate the specific restriction in 42 IAC 1-5-14 (IC 4-2-6-11) you are waiving):

IC 4-2-6-11(b)(1): 365 day required "cooling off" period before serving as a lobbyist.

IC 4-2-6-11(b)(2): 365 day required "cooling off" period before receiving compensation from an employer for whom the state employee or special state appointee was engaged in the negotiation or administration of a contract and was in a position to make a discretionary decision affecting the outcome of such negotiation or administration.

IC 4-2-6-11(b)(3): 365 day required "cooling off" period before receiving compensation from an employer for which the former state employee or special state appointee made a directly applicable regulatory or licensing decision.

IC 4-2-6-11(c): Particular matter restriction prohibiting the former state employee or special state appointee from representing or assisting a person in a particular matter involving the state if the former state officer, employee, or special state appointee personally and substantially participated in the matter as a state worker. (Please provide a brief description of the specific particular matter(s) to which this waiver applies below):



B. IC 4-2-6-11(g)(2) requires that an agency's appointing authority, when authorizing a waiver of the application of the post-employment restrictions in IC 4-2-6-11(b)-(c), also include specific information supporting such authorization. Please provide the requested information in the following five (5) sections to fulfill this requirement.

1. Please explain whether the employee's prior job duties involved substantial decision-making authority over policies, rules, or contracts:

*Santina Sullivan seeks an opinion on whether she can contract with a firm she has previously contracted with as independent consultant, prior to working the Indiana State Museum and Historic Sites, and would also like to be able to work as a contractor for them.*

*Santina is currently the Sr. V.P. of External Relations. As such, she is involved in decision making and contracts over special events, some publications, media buying and marketing. She is not over decisions for research which is under the Exhibits Department. Santina has worked with SMARI (Strategic Marketing and Research Insights) prior to working at the museum and introduced them to the museum. In 2014, ISMHS was in need of a public perception, benchmark study of the public prior to updating its core exhibits and historic sites renovations and hired SMARI. The Exhibits Department supervised this initiative and was the direct point of contact with SMARI. Mrs. Sullivan's only contribution to the team was for methodology and the survey design. SMARI has also been sending out email surveys to museum visitors utilizing their own software. The museum has paid SMARI \$4,500 over a three-year period. The museum is planning to repeat the statewide study next year. Santina is not currently involved in any discussions with SMARI over any future work.*

2. Please describe the nature of the duties to be performed by the employee for the prospective employer:

*Ms. Sullivan will be concentrating her consulting business on strategic planning, research and executive interviewing concerning marketing strategies, interim directorships, and project management. In this scope of work, Ms. Sullivan would utilize outside vendors for drafting pertinent surveys. She anticipates partnering with SMARI in this regard.*

3. Please explain whether the prospective employment is likely to involve substantial contact with the employee's former agency and the extent to which any such contact is likely to involve matters where the agency has the discretion to make decisions based on the work product of the employee.

*SMARI is interested in utilizing Santina to help with focus groups that they conduct for their clients nationally as well as executive interviewing. There would not be any contact with the Indiana State Museum and Historic Sites in this work.*

4. Please explain whether the prospective employment may be beneficial to the state or the public, specifically stating how the intended employment is consistent with the public interest.



*SMARI does work for many nonprofits so the work may be of benefit to the public through assisting a nonprofit.*

5. Please explain the extent of economic hardship to the employee if the request for a waiver is denied:

*Mrs. Sullivan needs to build a client base upon leaving and it is important that she be able to build upon relationships she had prior to becoming an ISMHS employee.*

C. Signatures

1. Appointing authority/state officer of agency

By signing below I authorize the waiver of the above-specified post-employment restrictions pursuant to IC 4-2-6-11(g)(1)(A). In addition, I acknowledge that this waiver is limited to an employee or special state appointee who obtains the waiver before engaging in the conduct that would give rise to a violation.

*Thomas A. King*  
Signature  
(Name of state officer or appointing authority)  
*Thomas A. King*

*8-15-2016*  
DATE

2. Ethics Officer of agency

By signing below I attest to the form of this waiver of the above-specified post-employment restrictions pursuant to IC 4-2-6-11(g)(1)(B).

*Janet Simpson*  
Signature  
(Name of ethics officer)  
*Janet Simpson*

*8/15/2016*  
DATE

D. Approval by State Ethics Commission

**FOR OFFICE USE ONLY**

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Approved by State Ethics Commission

  
James Clevenger, Chair, State Ethics Commission

  
Date

Mail to:

Office of Inspector General  
315 West Ohio Street, Room 104  
Indianapolis, IN 46202

OR

Email scanned copy to: [info@ig.in.gov](mailto:info@ig.in.gov)

*Upon receipt you will be contacted with details regarding the presentation of this waiver to the State Ethics Commission.*