

CWP Policy and Procedure Manual

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| Program: Administrative | Section: 7-30 |
| Subject: Conflict of Interest Policy | Effective Date: 2/4/16 |

Conflict of Interest Policy

A. Standards of Conduct [200.318(c)(1)]

The following standards of conduct govern the action of CWP employees, members and officers who engage in any CWP award process and administration of contracts.

1. No employee or authorized agent, CWP member or officer, shall participate in or cast a vote in the selection of or in the award or administration of a contract supported by a Federal award, if he or she has a real or apparent conflict of interest. Such a conflict shall arise when the employee/authorized agent/member/officer; *or* any member of his/her immediate family; *or* his/her partner; *or* an organization that he/she belongs to or that employs or is about to employ any of the above has a financial or other interest in or a tangible personal benefit from a firm considered or selected for a contract.
2. No employee or authorized agent, CWP member or officer, shall solicit or accept gratuities, favors or anything of monetary value from subrecipients, contractors, potential subrecipients or contractors, or parties to any subaward.
3. No employee or authorized agent, CWP member or officer, shall use any knowledge gained through their position for personal profit or the profit of family or friends.
4. CWP employees, authorized agents, members and officers shall be alert to organizational conflicts of interest as well as noncompetitive practices among subrecipients and contractors that may restrict or eliminate competition or otherwise restrain trade.
5. Measures by which conflict of interest will be controlled are as follows:
 - a. Staff with potential conflicts will be removed from the award/administration process.
 - b. Multiple staff will be involved in the process, preventing any single individual from controlling the selection or administration processes.
 - c. Each member of the evaluation team that rates proposals in a competitive procurement process, will complete and sign the Conflict of Interest and Disclosure Form (See Appendix E, Misc. Procurement Forms). If a conflict of interest exist with any team member according to Section 30.A.5 of these procedures, they are excused from the process and will not evaluate the proposals
 - d. All RFPs, RFQs, RSQs, and contracts shall contain provisions that clearly delineates the funding source's conflict of interest policies and the proposer's and/or subrecipient's responsibility regarding the procurement process.

B. Conflict of Interest Policy

In order to ensure objective subrecipient performance and eliminate unfair competitive advantage, subrecipients or contractors that develop or draft specifications, requirements, statements of work, invitations for bids, and/or requests for proposals shall be excluded from competing for such procurements.

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C. Potential Conflict of Interest: For federally funded solicitations, any potential conflict of interest must be disclosed in writing to the funder (e.g., CTDOL, USDOL, HHS) in accordance with original awarding federal agency policy, within five (5) business days of when CWP staff become cognizance of the potential conflict of interest. (Per 2 CFR 200.112)

1. Format and Content of Disclosure

Disclosure to the funder shall include a written description of the potential conflict of interest including the names of the CWP officer, employee, agent, Board member or subrecipient who may have the potential conflict of interest, a description of the relationship to the proposer, potential proposer or contractor and the date that CWP was made aware of the potential conflict.

2. Disclosure Submission

The written disclosure is issued by the President/CEO to the Federal director/manager with authority over the federal-funds and/or program.

3. Violations of Standards of Conduct

Per 200.318(c)(1), the federally funded recipient's standards of conduct must provide for disciplinary actions to be applied for violations of such standards by officers, employees, or agents of the recipient.

a. CWP Employees

As stated in the CWP employee handbook, CWP employees who violate the standards of conduct policy shall be subject to disciplinary action up to and including termination.

b. CWP Board of Directors

If the findings of an investigation of a violation of the standards of conduct are that a CWP Board member willingly and intentionally violated the standard of conduct described in Section 30.A above, that board member shall be subject to consequences as stated in the CWP Board of Directors handbook.