A. Standards of Conduct 2 CFR 200.318(c)(1)

The following standards of conduct, which address conflict of interest, govern the action of CWP employees, members and officers who engage in any CWP procurement 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.

B. Control Measures

1. Staff with potential conflicts will be removed from the award/administration process.

2. Multiple staff will be involved in the process, preventing any single individual from controlling the selection or administration processes.

3. 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. If a conflict of interest exist with any team member, they are excused from the process and will not evaluate the proposals.

4. 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.

5. To eliminate unfair competitive advantage, subrecipients and/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.

C. Disclosure of Potential Conflict of Interest  2 CFR 200.112

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.

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 of potential conflict of interest is issued by the President/CEO to the Federal director/manager with authority over the federal-funds and/or program.

D. Violations of Standards of Conduct 2 CFR 200.318(c)(1)
The following describes the disciplinary actions that are applied for violations of CWP’s standards of conduct by officers, employees and agents of CWP.

1. 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.

2. 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 A above, that board member shall be subject to disciplinary action up to and including removal from the Board.

E. Mandatory Disclosure 2 CFR 200.213
For federally funded solicitations and awards, CWP is required to disclose all violations of criminal law involving fraud, bribery, or gratuity to the Federal awarding agency or pass-through entity.