

POLICY

TITLE:	Conflict of Interest Policy	PROGRAM:	WIOA/Pathways
EFFECTIVE DATE:	06/1/2017	REVISIONS:	

Purpose

The purpose of this policy is to establish conflicts of interest guidelines for the US DOL America’s Promise Job Driven grant award that meets the requirements under state law and local policy when procuring goods (apparatus, supplies, materials, and equipment), services, and construction or repair projects paid for in part or whole by federal funds and required under 2 C.F.R. § 200.318(c)(1).

Policy

This policy applies when procuring goods (apparatus, supplies, materials, and equipment), services, and construction or repair projects funded in part or whole with federal financial assistance (direct or reimbursed). This policy also applies to subrecipient and contractor funds.

The executive director and/or project manager is responsible for managing the federal award and shall review the notice of award to identify any additional conflicts of interest prohibitions or requirements associated with the award, and shall notify all employees, officers, and agents, including subrecipients, of the requirements of this policy and any additional prohibitions or requirements.

- A. Conflicts of Interest.** In addition to the prohibition against self-benefiting from a public contract under G.S. 14-234, no officer, employee, or agent of the New River/Mount Rogers Workforce Development Area Consortium Board or its sub-recipients may participate directly or indirectly in the selection, award, or administration of a contract supported by the federal award if s/he has a real or apparent conflict of interest. A real or apparent conflict exists when any of the following parties has a financial or other interest in or receives a tangible personal benefit from a firm considered for award of a contract:
 1. the employee, officer, or agent involved in the selection, award, or administration of a contract;
 2. any member of his or her immediate family;
 3. his or her partner; or
 4. an organization which employs or is about to employ any of these parties.

Any officer, employee, or agent with an actual, apparent, or potential conflict of interest as defined in this policy shall report the conflict to his/ her immediate supervisor. Any such conflict shall be disclosed in writing to the Department of Labor in accordance with applicable Federal awarding agency policy.

- B. Gifts.** In addition to the prohibition against accepting gifts and favors from vendors and contractors under G.S. 133-32, officers, employees, and agents of the New River/Mount Rogers Workforce Development Area Consortium Board or its sub-recipients are prohibited from accepting or soliciting gifts, gratuities, favors, or

anything of monetary value from contractors, suppliers, or parties to subcontracts. Items of nominal value valued at less than \$200, which fall into one of the following categories may be accepted:

- a. promotional items;
- b. honorariums for participation in meetings; or
- c. meals furnished at banquets.

Any officer, employee or agent who knowingly accepts an item of nominal value allowed under this policy shall report the item to his or her immediate supervisor.

III. Violation

Employees violating this policy will be subject to discipline up to and including termination. Contractors violating this policy will result in termination of the contract and may not be eligible for future contract awards.

Date: June 1, 2017