

WASHOE COUNTY SUBRECIPIENT ENTITY CONFLICT OF INTEREST POLICY

The purpose of this policy is to avoid the actuality, as well as the appearance, of a conflict of interest or breach of trust by officials or employees of an entity receiving a grant of funds from Washoe County. A conflict of interest finding damages the reputation and credibility of the Subrecipient Entity and can jeopardize future grant awards. Further, the appearance of a conflict of interest can be just as damaging to the Grantee's reputation and credibility as an actual conflict.

This conflict of interest policy refers to conflicts of interest that arise when a Subrecipient of Washoe County expends funds under a grant award. These decisions include selection of a sub-recipient or procurements as described in 2 Code of Federal Regulation (CFR) 200 Section 200.318.

1. No officer, employee, or agent of the Subrecipient Entity shall have any arrangement concerning prospective employment that will, or may be reasonably expected to, bias the design, conduct, or reporting of a grant funded project on which they are engaged in the selection, award or administration.
2. The Subrecipient Entity officials, employees, agents, and sub-recipients shall not engage in the selection, award or administration of grant funds that might result in, or create the appearance of:
 - Using their official position for private gain
 - Giving preferential treatment to any person or organization
 - Losing complete independence or impartiality
 - Making an official decision outside of official channels
 - Affecting adversely public confidence in the grant funded program in particular and the County in general.
3. No officer, employee, or agent of the Subrecipient Entity shall participate in selection, award or administration of a contract (including sub-grants) supported by grant funds if there is an actual conflict of interest, or if there is an apparent conflict of interest. Such conflicts arise when:
 - The employee, officer, or agent,
 - Any member of their immediate family,
 - Their partner, or
 - An organization, which employs or is about to employ any of the above,
 - Has a financial or other interest in or tangible personal benefit from the firm considered for award.
4. The officers, employees, and agents of the Subrecipient Entity may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts. However, Subrecipient Entities may set standards for situations in which the financial interest is not substantial, or the gift is an unsolicited item of nominal value. The standards of conduct must provide for disciplinary actions to be applied for violations of such standards by officers, employees, or agents of the non-Federal entity.
5. The Subrecipient Entity's officers, employees, or agents shall guard against real, apparent, or potential Organizational Conflict of Interest (OCI) that might arise around how the county expends funds under a grant award, and where actual or apparent OCI might exist, take steps to neutralize or mitigate that OCI as best as possible.

Organizational Conflict of Interest generally falls into one of three categories:

1. Biased ground rules – contractor sets the “ground rules” for a procurement (e.g., writing a statement of work, specifications, or technical direction for the procurement), which appears to skew the competition in favor of the contractor.
2. Impaired objectivity – contractor’s work under a contract requires the contractor to evaluate their own or a competitor’s proposals or past performance; and
3. Unequal access to information – contractor has access to nonpublic information as part of its performance of a contract, which may provide the contractor (or an affiliate) with an unfair competitive advantage in current or future procurements.

The awarding agency may in regulation provide additional prohibitions relative to real, apparent, or potential conflicts of interest. The Subrecipient Entity must disclose in writing any potential conflict of interest to Washoe County Community Reinvestment in accordance with applicable Federal awarding agency policy.

Project Manager – Print Name

Signature Date:

Financial Representative – Print Name

Signature Date: