

**FEDERAL POLICY**

**CONFLICT OF INTEREST AND MANDATORY DISCLOSURES**

All funds awarded directly or indirectly through any federal grants or subsidy programs shall be administered in accordance with this policy, and any administrative procedures adopted implementing this policy.

The District complies with the requirements of state law and the Uniform Grant Guidance for conflicts of interest and mandatory disclosures for all procurements with federal funds.

Each employee, School Board member, or agent of the school system who is engaged in the selection, award or administration of a contract supported by a federal grant or award and who has a potential conflict of interest must disclose that conflict in writing to the Superintendent who, in turn, shall disclose in writing any such potential conflict of interest to NHDOE or other applicable pass-through-entity.

A conflict of interest would arise when the covered individual, any member of his/her immediate family, his/her partner or an organization, which employs or is about to employ any of those parties, has a financial or other interest in or received a tangible personal benefit from a firm considered for a contract. A covered individual who is required to disclose a conflict shall not participate in the selection, award or administration of a contract supported by a federal grant or award.

Covered individuals will not solicit or accept any gratuities, favors or items from a contractor or a party to a subcontractor for a federal grant or award. Violations of this rule are subject to disciplinary action.

The Superintendent shall timely disclose in writing to NHDOE or other applicable pass through-entity all violations of federal criminal law involving fraud, bribery or gratuities potentially effecting any federal award. The Superintendent shall fully address any such violations promptly and notify the Board with such information as is appropriate under the circumstances (e.g., taking into account applicable disciplinary processes).

**Legal References:**

2 C.F.R. Part 180 2 C.F.R. Part 200 200.305; 200.313(d); 200.317-.326; 200.403-.406; 200.413(a)-(c); 200.430; 200.431; 200.458; 200.474(b) 200 Appendix II 7 CFR Part 210 210.16; 210.19; 210.21; 215.14a; 220.16 Title 2 CFR Part 200

Proposed: 11/20/19

Adopted: 12/04/19