

**Policy DAF-5**  
**Administration of Federal Grants –**  
**Conflict of Interest and Mandatory Disclosures**  
**School Board Approved: April 19, 2021**



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

Each employee, 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 the New Hampshire Department of Education (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 the 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 CFR § 200.112*