

CENTER FOR CREATIVITY, INNOVATION, AND DISCOVERY

CONFLICT OF INTEREST POLICY

FEDERAL AWARDS

Purpose

The Board of Directors of the Center for Creativity, Innovation, and Discovery (CCID) has established this policy in compliance with §2 CFR 200.112. The policy seeks to ensure that the school, as a recipient or subrecipient of federal awards, follows all applicable federal and state laws, and relevant agency policies.

General Conflicts of Interest

A conflict of interest in the context of federal awards arises when an individual or entity's personal or professional interests could compromise the ability of that individual or entity to be impartial in making decisions or administering the award. The conflict can be due to personal financial interests, relationships with organizations involved in the award, or other factors that could compromise objectivity.

Organizational Conflicts of Interest

Organizational conflicts of interest can occur when a recipient has relationships with parent, affiliate, or subsidiary organizations that could compromise impartiality in conducting federal award actions.

Conflicts can arise when an individual has a financial interest in a company that is submitting a bid for a federal contract, or when an employee's family member is employed by a competitor

Requirements Related to Conflicts of Interest

The school will comply with all conflict-of-interest policies established by federal awarding agencies including procedures for identifying, disclosing, and mitigating potential conflicts.

As both a recipient and subrecipient of federal awards, the school will disclose any potential conflicts in writing to the Federal agency or pass-through entity awarding the grant in accordance with the established Federal agency's policies.

Procedures for Identifying, Disclosing, and Mitigating Potential Conflicts

In accordance with § 2 CFR 400.2, the school has established the following procedures for identifying, disclosing, and mitigating potential conflicts.

- Recipients must disclose in writing any potential conflicts of interest to the awarding agency or pass-through entity;
- Recipients must maintain written standards of conduct covering conflicts of interest and governing the performance of their employees in the selection, award and administration of Federal awards.
- No employee, officer or agent may participate in the selection, award, or administration of a Federal award if he or she has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from an entity considered for a Federal award.
- If the financial interest is not substantial or the gift is an unsolicited item of nominal value, the Board of Directors will determine whether there exists a conflict of interest under this policy.
- If an officer, employee, or agent of the school violates this conflict-of-interest policy, or any other conflict-of-interest policies, standards, and processes, disciplinary actions will be applied according to the relevant code of conduct policies and procedures of the school.
- As a recipient and subrecipient, the school will notify the awarding agency in writing of any conflicts of interest that may arise during the period of performance of an award.

Consequences of Non-Compliance:

The school acknowledges that, upon receipt of such a disclosure and within 30 calendar days unless a longer period of time is necessary due to the complexity of the situation, the respective awarding agency will review and make a determination in writing if a potential or real conflict of interest exists and develop a plan for addressing or mitigating the issue, which may include remedies found at 2 CFR 200.339. USDA awarding.

The school also understands that failure to disclose or resolve conflicts of interest in a manner that satisfies the government can lead to termination of the award, suspension, or debarment.

Reviewed: June 2025