

GCCSA Donor Advised Funds 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.

GCCSA 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, Board of Trustees, or agent of the school 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 Director 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 Director 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 affecting any federal award. The Director 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).