

Resolution R26-2017  
June 14, 2017

**METROPOLITAN WASHINGTON COUNCIL OF GOVERNMENTS  
777 NORTH CAPITOL STREET, NE  
WASHINGTON, DC 20002**

**RESOLUTION ADOPTING A POLICY ON CONFLICT OF INTEREST FOR FEDERAL AWARDS**

**WHEREAS**, the U.S. Office of Management and Budget's Uniform Administrative Requirements include establishment of a conflict of interest policy for federal awards; and

**WHEREAS**, it is the intent of the Board of Directors to specifically require employees, board members, and agents acting on behalf of the Metropolitan Washington Council of Government (COG) to comply with COG's existing policies, rules, and procedures on conflicts of interest when procuring property and services under a federal award; and

**WHEREAS**, COG is required to disclose, in writing, potential conflicts of interest and violations of federal criminal law to federal awarding agencies.

**NOW, THEREFORE, BE IT RESOLVED BY THE COG BOARD OF DIRECTORS OF THE METROPOLITAN WASHINGTON COUNCIL OF GOVERNMENTS THAT:**

The board adopts the Conflict of Interest Policy for Federal Awards (attached), specifying that COG's existing policies, rules, and procedures related to conflicts of interest apply to federal awards, and requiring reporting and disclosure of apparent, potential, or suspected conflicts of interest.

**I HEREBY CERTIFY THAT the foregoing resolution was adopted by the COG Board of Directors on June 14, 2017.**

**Laura Ambrosio  
COG Communications Specialist**



# Board Policy

Subject: Conflict of Interest Policy for Federal Awards

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| Policy Owner: | Executive Office  |
| Applies To:   | All Metropolitan Washington Council of Governments (COG) employees, members, and officers of the COG Board, and persons acting as agents of COG.  |
| Purpose:      | The purpose of this policy is to establish conflict of interest policies for federal awards and to ensure compliance with mandatory disclosure requirements.  |
| Background:   | U.S. Office of Management and Budget's (OMB) Uniform Guidance "Administrative Requirements" in Subpart B require establishment of a conflict of interest policy for federal awards (2 CFR 200.112), and mandatory disclosure in the event of a violation (2 CFR 200.113).   |
| Definitions:  | <ol style="list-style-type: none"><li>1. <b>Interest</b> - any involvement, ownership, relationship, obligation, direct or indirect, that may influence a person's judgment</li><li>2. <b>Conflict of Interest</b> - when there is the benefit or perceived benefit, either personally or organizationally, in a financial or other interest in the selection of a federal award. Examples include:<ol style="list-style-type: none"><li>(a) a personal past, present, or future connection, including benefits to family members or businesses with which the person is closely associated, that precludes the ability to act impartially in making decisions</li><li>(b) soliciting, or accepting gifts or gratuities</li></ol></li></ol> |
| Policy:       | <p>When procuring property and services under a federal award, employees will be familiar with and apply the following COG policies, rules, and procedures:</p> <ol style="list-style-type: none"><li>(a) Code of Conduct provisions in COG's procurement policy</li><li>(b) Conflicts of Interest provision in the Board of Directors' Rules and Procedures</li><li>(c) Human Resources policies and procedures that relate to conflicts of interest</li></ol> <p>Any apparent, potential, or suspected conflict of interest will be reported immediately to the Executive Director and the Contracts and Purchasing Manager.</p>  |

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|                        | <p>The following will be disclosed, in a timely manner and in writing, to the federal awarding agency or pass-through entity:</p> <ul style="list-style-type: none"> <li>(a) any potential conflict of interest in a federal awarding agency or pass-through entity in accordance with applicable federal awarding agency policy</li> <li>(b) all violations of federal criminal law involving fraud, bribery, or gratuity violations potentially affecting a federal award</li> </ul> |
| <p>Responsibility:</p> | <p>It is the responsibility of each employee, board member, or agent acting on behalf of COG to ensure that he/she adheres to this and all applicable policies related to conflict of interest, and conflict of interest disclosure.</p>   |