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## Conflict of Interest Policy

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### PURPOSE

To improve quality and bring more accountability and transparency into the selection, award or administration of a contract related to the Coalitions early learning programs.

### ROLES AND RESPONSIBILITIES

As outlined in Section 1002.84(20), Florida Statutes (F.S.), the Coalition will ensure that all outlined requirements for approving contracts with related parties are strictly followed. To include:

- The Coalition will follow the following steps prior to executing contracts for \$25,000 or more and prior to submitting the contract to OEL for approval:
  - A. The Coalition will approve the contract by a two-thirds vote of the board with a quorum having been established.
  - B. Conflicts of interest\* are disclosed before the vote.
  - C. Any member who may benefit from the contract must abstain from the vote.
- Contracts under \$25,000 will not require OEL prior approval, but will be submitted to OEL within 30 days of execution with the same required voting, conflict and abstention provisions as those listed for contracts above \$25,000.
- No employee, officer, or agent of the Coalition shall participate in the selection, award, or administration of a contract involving the Coalition if a real or apparent conflict of interest would be involved. Such a conflict would arise when the employee, officer, or agent or any member of her or his immediate family member or relative (family member or relative is defined as “any father, mother, son, daughter, husband, wife, brother, sister, father-in-law, mother-in-law, son-in-law, or daughter-in-law”), his or her partner, or an organization that employs or is about to employ any of the parties indicated herein, has a financial or other interest in the firm selected.
- Officers, board members, and employees of the Coalition shall neither solicit nor accept gratuities, favors, or anything of monetary value from vendors or parties to sub-agreements or contracts.
- Any new contract entered into on or after the approval date will comply with these requirements.

\***Conflicts of interest** arise when for any transaction the benefits of an interested party may be seen as competing with those of OEL. Such conflicts of interest—

- May be financial (where an interested party benefits financially directly or indirectly) or non-financial (e.g., seeking preferential treatment, using confidential information).
- Include *actual conflicts* (where a real act, event or transaction has occurred), *potential conflicts* (e.g., when an employee or his/her immediate family member(s) may receive benefits or profit directly or indirectly), and *perceived conflicts* (e.g., where the nature and circumstances of the event or transaction would lead a prudent person to believe a conflict exists or may exist).
- Included organizational conflicts of interest that occur because of relationships with a parent, affiliate or subsidiary organization. Due to interconnected nature of program operations, processes, and benchmarks, a non-Federal entity like OEL is unable (or may appear to be unable) to operate on an independent or impartial basis in conducting a procurement action involving a related organization, such as an ELC or other OEL subrecipient. Note: consideration of this type of conflict is required for federally-funded grant programs in accordance with 2 CFR Part 200.318(c)(2).

Approved by the Board of Directors: May 22, 2014

Revisions approved by the Finance Committee: September 24, 2015