

Conflict of Interest and Nondiscrimination Compliance

Conflict of Interest

Any officer, employee, or agent of the subrecipient or of CSDJFS who exercises any function or responsibilities about the planning and carrying out of this Subaward Agreement or any other persons who exercise any functions or responsibilities regarding this Subaward Agreement shall have no personal financial interest, direct or indirect, in this Subaward Agreement. Subrecipient shall disclose in writing to CSDJFS any potential conflict of interest and all violations of Federal Criminal law involving fraud, bribery, or gratuity violations potentially affecting this Subaward Agreement.

Conflict of interest for a given service exists when a provider has ties to an applicant who is seeking CSDJFS funded services. A conflict exists when the interests of friends, relatives, or business associates are promoted. Such ties may include, but are not limited to:

- Familial relationship with applicants either through blood or marriage
- Financial relationship with applicant through employment or consultancies, either directly or through immediate family
- Personal relationship with applicants

In situations where conflict of interest exists, the subrecipient shall review the case, transfer the case to another individual within the organization, or to another agency to provide the service. In all instances, CSDJFS shall be notified **immediately** of the situation and how the subrecipient intends to proceed. When the subrecipient cannot determine a best practice to rectify the situation, CSDJFS shall be notified to assist with a resolution. Resolutions must occur within ten (10) calendar days of when the conflict of interest matter arises or was identified. Documentation of resolutions must be kept in the applicant's file.

Nondiscrimination Compliance

Subrecipients are bound to their CSDJFS Subaward Agreement terms regarding mandated Civil Rights trainings, displays of specified federal nondiscrimination compliance posters, and adherence to all federal and State of Ohio non-discrimination, intimidation, and equal employment opportunity laws, statutes, rules, regulations, and executive orders, as amended.