

## **7.9.16 Grant Code of Conduct Requirements**

### General Information

Federal grant regulations require grant recipients to comply with code of conduct provisions within the grant award or agreement and in the Uniform Administrative Requirements at 29 CFR Part 95.

CLC employees shall not participate in the selection, award, or administration of a procurement contract with grant funds if there is, or would create, a real or apparent conflict of interest.

MnSCU Procedure 1C.0.1 Employee Code of Conduct summarizes state regulations regarding conflicts of interests, and determines a conflict of interest when an employee:

- Uses his/her position to secure an advantage for them self, immediate family or an organization with which they are associated, that is not available to the general public;
- Accepts employment or a contractual obligation which would affect his/her independence of judgment in their CLC responsibilities;
- Performs other work subject to direct or indirect control, review or enforcement by them self in their CLC position;
- Uses state time, facilities, equipment, supplies, badge, uniform, influence of their position, or confidential information for personal gain;
- Receives payment from non-state sources for work they are expected to do during their regular employment; or
- Competes with the MnSCU system for services the MnSCU system provides.

Employees involved in purchasing or contract decisions may not have any personal financial interest in the purchase or contract and shall neither solicit nor accept gratuities, favors or anything of monetary value from contractors and vendors.

### Responsibilities

Employees applying for or engaged in the administration of grant contracts shall review all applicable MnSCU and state code of conduct policies and procedures, and the U.S. Department of Labor Administrative Requirements at 29 CFR Part 95.

Code of conduct and conflict of interest training will be available and documented within D2L. All new grant employees shall complete this training initially and every three years. Grant employees shall complete the Potential Conflict of Interest Disclosure Form initially and shall report any new potential conflict of interest within 14 days of discovering such conflict.

The Potential Conflict of Interest Disclosure Form shall be submitted to the employee's supervisor. If a potential conflict of interest is disclosed, the form will be submitted to Director of Human Resources and a copy to the Vice President of Administrative Services, who both shall investigate the potential conflict and determine the appropriate action, including managing any conflict. Any conflict of interest mitigation plan shall be approved by the college president.

Employees who fail to comply with the Code of Conduct requirements are subject to disciplinary action, up to and including termination of employment and possible criminal and civil legal action per MnSCU Procedures 1C.0.1 Employee Code of Conduct, 1C.2 Fraudulent or Other Dishonest Acts and Minnesota Statutes 43A.39.

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Signature of College President

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