

**ATTACHMENT 3-B(1): POTENTIAL CONFLICT OF INTEREST
DISCLOSURE – TEMPLATE INSTRUCTIONS
FOR DEVELOPING THE FORM FOR UGLG’S / GRANTEE’S PROJECT**

**INSTRUCTIONS TO UGLG / GRANTEE OR SUBRECIPIENT
[These Are Not Instructions for a Prime Contractor]**

The conflict of interest provision applies to any individual who is an employee, agent, consultant, officer, or elected official or appointed official of the state, or of a unit of general local government (UGLG), or of any designated public agencies, or subrecipients. UGLGs are required to have measures in place to identify and review potential conflicts of interest for the UGLG’s contracting with entities (i.e., **prime contractors, including construction and non-construction/professional services contractors**) for the Community Development Block Grant (CDBG) project. **The Disclosure of Potential Conflict of Interest form (or similar type of form developed by the UGLG) may be used as part of the process.** [NOTE: When the Grantee’s subrecipient is initiating the contracting (instead of the UGLG/Grantee), this form should be modified for use to include the subrecipient organization name, organizational executive board members, owners, administrative staff, etc.]

1. Enter the title of the CDBG project and the name of the UGLG.
2. Check the appropriate box regarding the **prime** contractor’s relationship (family and/or business) with the individuals listed.
3. *Elected Officials*: The UGLG should enter the names and titles of all elected officials **involved in approving the contract and/or the prime contractor’s future payment requests**. This should include the chief elected official as well as elected members of the governing body, and other elected officials (e.g. municipal Clerk/Treasurer, etc.) that will be **involved in approving the contract and/or the prime contractor’s future payment requests**. The contractor must note any family or business ties with any of the listed elected officials and briefly describe the relationship.
4. *Administration, Department Heads and Legal Counsel*: The UGLG should enter the names and titles of any appointed officials that will be **involved in approving the contract and/or the prime contractor’s future payment requests**. The contractor must note any family or business ties with any of the listed appointed officials and briefly describe the relationship.
5. *Professional Services*: If the UGLG has contracted with a firm for professional services such as engineering, grant administration or planning, and the firm will be **involved in approving the contract and/or prime contractor’s future payment requests**, the UGLG should list the contracted firm(s) information, including the primary contact’s name, title and firm name. The contractor must note any family or business ties with any of the listed professional services firms and briefly describe the relationship.
6. *Potential Conflict of Interest Review*: Enter the location, date and time of the meeting in which the review of any potential conflicts of interests disclosed by the potential **prime** contractor will occur.
7. The **prime** contractor is to sign and date the *Potential Conflict of Interest Disclosure* form and submit the form to UGLG when submitting the bid or proposal.
8. The UGLG is to maintain documentation of measures in place and any efforts made to identify and review potential conflicts of interests, which may include signed *Potential Conflict of Interest Disclosure* forms.

NOTE: The UGLG must follow the guidance in *Chapter 3: Procurement & Contracting* of the *CDBG Implementation Handbook* for reviewing potential conflicts of interest that are disclosed prior to awarding a contract to the disclosing entity.