***MODIFY THIS TEMPLATE FOR GRANTEE/SUBRECIPIENT USE.***

* *This template is optional. The grantee or subrecipient may use this form or a different form or process to comply with the FFP conflict of interest requirements. grantee and subrecipients must ensure potential conflicts of interest are disclosed by any contractor to which the grantee or subrecipient intends to award a contract (i.e., a prime contractor).*
* *Delete the instructional notes and yellow highlighting when customizing this form for use.*
* *Refer to the Instructions on the next page for additional guidance.*

**POTENTIAL CONFLICT OF INTEREST DISCLOSURE**

*Pursuant* [2 CFR 200.318](https://www.ecfr.gov/current/title-2/part-200/section-200.318#p-200.318(c))*, decisions concerning the federal grant funds must be free of undisclosed personal or organizational conflicts of interest, both in fact and in appearance. No employee, officer, or agent of the grantee or subrecipient may participate in the selection, award, or administration of a contract supported by a federal award if they have a real or apparent conflict of interest. Conflict of interest provisions within the Code of Federal Regulations must be addressed as part of procurement and contracting processes. Grantees, subrecipients, and contractors must disclose in writing any potential conflict of interest. Documentation of any disclosure of a potential conflict of interest and the grantee’s review of the potential conflict must be provided by the grantee to the State of Wisconsin Department of Administration (DOA) Division of Energy, Housing and Community Resources (DEHCR) for review prior to proceeding with contracting.*

**<Insert Title of Project>**

**<Insert Grantee or Subrecipient Name, e.g. City of Yourville>**

*Instructions:**In* ***Parts A. and B.*** *below, please check the box next to any person listed, and/or add the name and title of other persons not listed but who are involved with the project, that you have a known family or business relationship. Select “None of the Above” if you have no known family or business relationship with the individuals listed and have none to add. In* ***Part C.****, describe the relationship(s) with each person for which you checked the box in Parts A. and B. In* ***Part D.****, enter your typed or printed name, title, signature, company/firm name, and signature date.*

PART A. ELECTED OFFICIALS:
*[Refer to the Instructions on the next page for guidance on officials to list below.]*

[ ] <INSERT FULL NAME AND TITLE OF CHIEF ELECTED OFFICIAL>

[ ] <INSERT FULL NAME AND TITLE OF OTHER ELECTED OFFICIAL>

[ ] <INSERT FULL NAME AND TITLE OF OTHER ELECTED OFFICIAL>

[ ] OTHER (Please specify):

[ ] NONE OF THE ABOVE

PART B. OTHER PERSONS INVOLVED WITH PROJECT:

*[Refer to the Instructions on the next page for guidance on individuals to list below.]*

[ ] <INSERT FULL NAME AND TITLE>

[ ] <INSERT FULL NAME AND TITLE>

[ ] <INSERT FULL NAME AND TITLE>

[ ] OTHER (Please specify):

[ ] NONE OF THE ABOVE

PART C. Description of Relationship(s):

PART D. CERTIFICATION: By signing below, I certify the information provided above is true, accurate, and correct. I also acknowledge and understand that the name of any contractor with a potential conflict of interest will be disclosed at the <Insert Governing Body Name, e.g., City Council, Village or Town Board> meeting in which <bids/proposals> are discussed. Potential conflicts of interest will be reviewed in accordance with 2 CFR 200.318.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  |  |  |  |  |
| Printed Name of Contractor Representative |  | Title |  | Signature |
|  |  |  |
| Name of Entity (i.e., name of business/company, firm, or organization) |  | Date Signed [MM/DD/YYYY] |

**POTENTIAL CONFLICT OF INTEREST
DISCLOSURE FORM – INSTRUCTIONS
FOR DEVELOPING THE FORM FOR GRANTEE’S PROJECT**

***INSTRUCTIONS TO GRANTEE OR SUBRECIPIENT
Do Not include the instructions that follow when providing the Disclosure form to a contractor.
This is Not guidance intended for the 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 local or tribal government, or of any designated public agencies, or subrecipients. Grantees are required to have measures in place to identify and review potential conflicts of interest for the grantee’s and/or subrecipient’s contracting with entities **(i.e., prime contractors, including with construction, professional services, and other non-construction contractors)** for the FFP project. **The *Disclosure of Potential Conflict of Interest* form (or similar type of form developed by the grantee or subrecipient) may be used as part of the process.** *[NOTE: When the subrecipient is initiating the contracting (instead of the 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 FFP project and the name of the local or tribal government.
2. *Part A. Elected Officials*: The grantee is to enter the names and titles of all elected officials **involved in bid/proposal review and evaluation, contract award, contractor invoice and payment request reviews and processing, construction management, contractor compliance monitoring, or similar project or contractor oversight**. This should include the chief elected official as well as elected members of the governing body, and other elected officials who will be involved with the FFP project. The contractor must disclose any family or business ties with any of the elected officials listed and add any if applicable in Part A, and briefly describe the relationship in Part C.
3. *Part B. Other Individuals Involved with Project:* The grantee is to enter the names and titles of **employees and other representatives of the grantee or subrecipient who have or will have a role** **in bid/proposal review and evaluation, contract award, contractor invoice and payment request reviews and processing, construction management, contractor compliance monitoring, or similar project or contractor oversight**. Examples may be ‘appointed’ officials and employees involved with the FFP project, grant manager, grant administration firm representative, engineering firm representative, legal counsel, etc. The contractor must disclose any family or business ties with any of the persons listed and add any if applicable in Part B, and briefly describe the relationship in Part C.
4. *Part D. Certification:*  The grantee or subrecipient is to enter their name and the governing body’s or executive board’s name and indicate whether this pretains to “bids” or “proposals.” The contractor is to sign and date the form and submit it to the grantee or subrecipient. This should be submitted by the contractor at the time of bid or proposal submission, prior to contracting.
5. The grantee 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 from responders of the bid/proposal solicitation.

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