



ARKANSAS DEPARTMENT OF FINANCE AND ADMINISTRATION
OFFICE OF INTERGOVERNMENTAL SERVICES

SUBGRANT ADMINISTRATION GUIDE
PART I: GENERAL INFORMATION

D. CONFLICT OF INTEREST

1. **ADVICE**

No official or employee of a subgrant organization shall participate personally through decisions, approval, disapproval, recommendation, the rendering of advice, investigation, or otherwise in any proceeding, application, request for a ruling or other determination, in which subgrant funds are used, where to his/her knowledge, he/she or his/her immediate family, partners, organization other than a public agency in which he/she is serving as an officer, director, trustee, partner, or employee, or any person or organization with whom he/she is negotiating or has any arrangement concerning prospective employment, has a financial interest, or has less than an arms-length transaction.

2. **APPEARANCE**

In the use of federal grant funds, officials or employees of subgrant organizations shall avoid any action which might result in, or create the appearance of:

- a. Using his or her official position for private gain;
- b. Giving preferential treatment to any person;
- c. Losing complete independence or impartiality;
- d. Making an official decision outside official channels; or
- e. Affecting adversely the confidence of the public in the integrity of the government or the program.

3. **ACTION**

Where an actual conflict or an appearance of a conflict of interest exists, the person for whom the actual or apparent conflict of interest exists shall recuse himself or herself not only from reviewing the application for which the conflict exists, but also from the evaluation of all competing applications.