

**NORTH COUNTRY COMMUNITY MENTAL HEALTH  
ADMINISTRATIVE MANUAL**

**CHAPTER:** Four – Finance  
**SECTION:** One – Contract Management  
**POLICY NAME:** CONFLICT OF INTEREST  
**EFFECTIVE DATE:** March 1, 2020

**PURPOSE**

The purpose of this policy is to comply with 2 CFR200.318 addressing conflict of interest in the procurement process.

**APPLICATION**

All North Country Community Mental Health (NCCMH) service programs.

**POLICY**

It is the policy of North Country Community Mental Health that no employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a Federal award if he or she has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract. The officers, employees, and agents of the non-Federal entity may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts. However, non-Federal entities may set standards for situations in which the financial interest is not substantial, or the gift is an unsolicited item of nominal value. The standards of conduct must provide for disciplinary actions to be applied for violations of such standards by officers, employees, or agents of the non-Federal entity.

**REFERENCES:** CFR200.318

**REVIEWED:**

**REVISED:**

**APPROVED BY SIGNATURE:**

*Christine Gebhard*  
Chief Executive Officer

02/20/2020  
Date

*Edward G. Ginop*  
NCCMH Board Chair

02/20/2020  
Date