



City of New Orleans

Shelter Plus Care Program

Standards of Conduct and Conflict of Interest Policy for Procurement Activities

Purpose

The Shelter Plus Care (S+C) Program is committed to maintaining the highest ethical standards in the administration of federal funds. This policy establishes written standards of conduct governing the performance of employees, officers, agents, contractors, and subrecipients engaged in the selection, award, and administration of contracts supported by federal financial assistance.

The purpose of this policy is to prevent actual, potential, or perceived conflicts of interest and to ensure compliance with applicable federal regulations, including **2 CFR Part 200 (Uniform Guidance)**.

Policy Statement

All employees, officers, agents, and subrecipients involved in procurement activities shall conduct themselves in a manner that promotes integrity, fairness, transparency, and accountability. Procurement decisions shall be made solely based on the best interests of the Shelter Plus Care Program and without regard to personal gain.

Conflict of Interest

No employee, officer, agent, or subrecipient may participate in the selection, award, or administration of a contract supported by federal funds if he or she has a real or apparent conflict of interest.

A conflict of interest exists when the individual, any member of his or her immediate family, partner, or an organization that employs or is about to employ any of these parties has a financial or other personal interest in or may benefit from a firm considered for a contract.

Individuals shall immediately disclose any actual or potential conflict of interest to the Program Administrator or designated ethics official before participating in any procurement-related decision.

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Standards of Conduct

Individuals responsible for procurement activities shall:

- Conduct procurement activities fairly, openly, and impartially.
- Avoid any activity that creates an actual or perceived conflict of interest.
- Disclose potential conflicts promptly.
- Maintain confidentiality of procurement information.
- Ensure all procurement decisions are based on objective evaluation criteria.
- Comply with all applicable federal, state, and local procurement laws and regulations.
- Maintain documentation supporting procurement decisions.

Gifts, Gratuities, and Favors

Employees, officers, agents, and subrecipients shall not solicit or accept gratuities, favors, gifts, entertainment, loans, discounts, or anything of monetary value from contractors, potential contractors, or parties seeking to do business with the Shelter Plus Care Program.

Nominal items of insignificant value that are permitted under applicable state or local ethics laws may be accepted only when they do not influence or appear to influence procurement decisions.

Organizational Conflicts of Interest

Where a subrecipient, contractor, or affiliated organization has relationships that may impair impartiality or create an unfair competitive advantage, appropriate measures shall be taken to eliminate or mitigate the conflict before procurement proceeds.

Disclosure Requirements

All employees and subrecipients shall disclose:

- Financial interests that could affect procurement decisions.
- Family or business relationships with vendors or contractors.
- Outside employment that may present a conflict.
- Any other circumstance that could impair independent judgment.

Disclosures shall be made in writing and maintained in program records.

Violations

Violations of this policy may result in disciplinary action, including:

- Removal from procurement responsibilities.
- Written reprimand.
- Suspension or termination of employment or contractual relationship.
- Recovery of improperly expended federal funds where applicable.
- Referral to appropriate oversight or law enforcement authorities.

Responsibilities of Subrecipients

All subrecipients receiving Shelter Plus Care federal funds shall:

- Adopt and maintain written standards of conduct meeting the requirements of **2 CFR Part 200**.
- Train employees involved in procurement on conflict-of-interest requirements.
- Require disclosure of actual and potential conflicts.
- Maintain documentation demonstrating compliance.
- Cooperate with monitoring and audits conducted by the City of New Orleans or other authorized agencies.

Monitoring and Enforcement

The Shelter Plus Care Program shall periodically review procurement files, conflict-of-interest disclosures, and subrecipient policies to ensure compliance with federal requirements. Findings

of noncompliance may require corrective action, repayment of funds, suspension of procurement authority, or other remedies permitted under federal regulations.

Authority

This policy is adopted pursuant to:

- 2 CFR §200.318(c)(1) – General Procurement Standards
- 2 CFR Part 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
- Applicable City of New Orleans procurement and ethics policies
- Applicable Louisiana ethics laws

Effective Date

This policy shall become effective upon approval and shall remain in effect until amended or superseded.